

## DSB Security Policy

### I General

- 1.1 This DSB Security Policy (the “**Security Policy**”) sets out the security standards and processes that will apply to the DSB Services that the DSB will provide to the User.
- 1.2 This Security Policy forms part of the Agreement agreed between the User and the DSB. Defined terms shall have the same meaning as set out in the Main Terms and as otherwise set out herein.

### 2 Security Measures

- 2.1 The DSB shall apply the following security standards and processes to the DSB Service with the aim of preserving the confidentiality, integrity and authenticity of data available on or through the DSB Service.

Standard / Process	Details
<b>ISO27001/2 Accreditation</b>	The DSB is ISO 27001 certified. The certificate is available on the <a href="#">DSB website</a> <sup>1</sup> .
<b>Acceptable Use Policy</b>	The Acceptable Use Policy sets out the restrictions applicable to using the DSB Service, as amended by the DSB from time to time.
	Detailed rules of engagement documents have been created for both FIX and ReST APIs (as described in the Subscription Management and Connectivity Policy) for the OTC ISIN Services and UPI Services respectively and are available for public download from the DSB website for <a href="#">OTC ISIN</a> and <a href="#">UPI</a> .
	FIX API users are also required to complete the DSB's FIX client certification process successfully. The certification document is available for public download from the <a href="#">DSB website</a> <sup>2</sup> .
<b>Information Security Policy</b>	The DSB maintains an information security policy aligned with external information security standards and will be reviewed annually. The DSB maintains an <a href="#">Information Security FAQ</a> <sup>3</sup> on its website where updates and specifics can be found to assist Users.
	The information security policy is communicated to all employees, third-party employees and contractors.
<b>IT Standards, Processes and Procedures</b>	The DSB will maintain the standards and procedures supporting its IT processes and functions that are reviewed and, if required, updated annually.
	When a significant change occurs, the continuing suitability, adequacy, and effectiveness of the IT processes and procedures shall also be reviewed.

<sup>1</sup> <https://www.anna-dsb.com/download/iso-27001-certificate-2024/>

<sup>2</sup> <https://www.anna-dsb.com/download/fix-certification-user-guide/>

<sup>3</sup> <https://www.anna-dsb.com/download/dsb-information-security-faq/>

Standard / Process	Details
<b>Governance Process</b>	<p>The DSB protects and secures its data managed through an information security program that is overseen centrally by the DSB management team representing:</p> <ul style="list-style-type: none"> <li>• Senior firm management</li> <li>• Senior business unit management</li> <li>• Information security officers</li> </ul>
	<p>The DSB:</p> <ul style="list-style-type: none"> <li>• Approves, maintains, consistently applies and enforces compliance with the policies, program plans, procedures and controls supporting the information security governance program</li> <li>• Maintains clear lines of reporting, responsibility, accountability, communication of expectations and the delegation of appropriate authority supporting decisions</li> <li>• Manages the effect of security issues on the firm, business lines and related processes. Oversees risk mitigation activities to address issues</li> <li>• Maintains risk measurement definitions and criteria, establishes acceptable levels of information security risks</li> <li>• Requires that data with similar criticality and sensitivity characteristics are protected consistently throughout the DSB</li> <li>• Maintains preventative, detective and responsive measures to support overall cyber resilience and the confidentiality, integrity and availability of information security assets</li> <li>• Coordinates information with physical security</li> </ul>
	<p>The DSB, with regards to the information security governance program, is responsible and held accountable for the following:</p> <ul style="list-style-type: none"> <li>• Central oversight and coordination</li> <li>• Assignment of responsibility</li> <li>• Risk assessment and measurement</li> <li>• Monitoring and testing</li> <li>• Reporting</li> <li>• Acceptable residual risk</li> <li>• Risk acceptance</li> </ul>
	<p>The DSB reviews the information security program, considering the results of internal and external assessments, reviews and audits.</p>
	<p>The DSB has a Cyber Strategy Group (“<b>CSG</b>”) who performs risk management functions.</p>
	<p>The CSG:</p> <ul style="list-style-type: none"> <li>• Reports directly to the board or to senior firm management</li> <li>• Has sufficient independence to perform their assigned tasks</li> <li>• Has the authority to respond to a security event where confidentiality, integrity, availability or accountability of an information system is compromised</li> <li>• Has the capacity to order emergency actions to protect the DSB and its customers from an imminent loss of information or value</li> <li>• Holds a sufficient organisational position to enable them to perform their assigned tasks</li> </ul>
	<p>The DSB will undertake an independent evaluation of its control environment relative to the services provided to its Users.</p>

Standard / Process	Details
<b>Asset Inventory</b>	The DSB maintains an inventory of assets (both hardware and software) that includes ownership, location, classification/criticality of each asset, covering all IT systems which access, store or process User data ( <b>Asset Inventory</b> ).
<b>InfoSec Training</b>	<p>The DSB provides an active IT security awareness training program (<b>IT Security Awareness Training</b>) that includes as a baseline:</p> <ul style="list-style-type: none"> <li>• The DSB's information security program</li> <li>• Using IT resources</li> <li>• Information management</li> <li>• Local and remote access</li> <li>• Internet safety</li> <li>• Physical security and backups</li> <li>• Computer security review</li> </ul> <p>Each employee shall perform the IT Security Awareness Training at least annually. The DSB's CSG reviews and updates the associated training material periodically. The status of the security training is continuously followed up by the management.</p> <p>Customised training materials can be created, and the training status is tracked.</p> <p>Project-specific data privacy awareness training (<b>Data Privacy Awareness Training</b>) can be created for the project staff, containing User-specific data privacy or other requirements.</p> <p>The DSB has an active Data Privacy Awareness Training program that includes as a baseline:</p> <ul style="list-style-type: none"> <li>• Reporting</li> <li>• PII &amp; Sensitive Data</li> <li>• Data Privacy Laws</li> <li>• Social Media Risks</li> <li>• Email Scams</li> <li>• Password Security</li> </ul> <p>Each of the DSB's employees shall perform the Data Privacy Awareness Training annually. The DSB's CSG reviews and updates the training material periodically. The status of the security training is continuously followed up by the management.</p>
<b>Employment Policy</b>	<p>The DSB maintains a joiners, movers and leavers process and procedures for all employees.</p> <p>All employees and contingent staff are screened before being onboarded in accordance with relevant internal policies, laws, regulations and ethics and proportional to the business requirements, the classification of the information to be accessed and the risk resulting from their failure to perform their role/function in an acceptable manner.</p> <p>All employees and contingent staff are required to sign terms and agreements of confidentiality, non-disclosure, acceptable use and/or code of conduct/ethics.</p> <p>All employees and contingent staff receive awareness training and updates related to Information Security, including privacy, and other organisational policies and procedures relevant to their job functions at least annually. Additionally, there is a process to track compliance to the organisation's awareness training exercises.</p>

Standard / Process	Details
	The DSB maintains a disciplinary process for non-compliance with information security policies.
<b>End of Service</b>	The DSB ensures that access to User information or User IT systems is removed on or before the last day of service and that the DSB owned devices that can store, or access User information are returned.
<b>Physical Security</b>	The DSB maintains a policy, standard, and procedures supporting physical security, including physical access to the building, access control processes, and emergency procedures.
	All personnel entering the premises are forced to enter through a controlled entry point monitored by a receptionist or security guard. Personnel have access cards or fobs to enter the office. Physical access rights to secure areas are appropriately modified to reflect changes in responsibility, including transfer and termination.
	Access authorisation procedures are in place to cover granting, removing, and reviewing access, including retrieving access keys/IDs. The procedures apply to all persons (e.g., employees and suppliers) requiring access to the premises.
	Physical access to the site or building includes: <ul style="list-style-type: none"> <li>Staffed reception area controls physical access to the site or building (staffed 8 X 5)</li> <li>All facility entrance points, main perimeter walls, and exit points are monitored 24 X 7 via either security staff or CCTV coverage</li> <li>Logging and monitoring procedures exist, covering access control usage that indicates who entered the facility (employee and visitor) and when, as well as CCTV playbacks</li> <li>CCTV monitors entrances to loading and delivery areas</li> <li>Restricted to authorised personnel only by key card access or access key fob</li> </ul>
	Visitors are required to be escorted by a responsible employee. Visitors include friends, maintenance specialists, computer suppliers, consultants (unless long term, special guest access is provided), maintenance personnel, and external auditors.
	The building management company authorises building access to third parties such as suppliers and service providers, requiring them to sign in on their visitors logs. Cleaners are provided with access via fob and are required to log their hours in separate registers.
	Policies, processes and procedures are in place to ensure that access to information storage facilities is restricted to authorised individuals and ensures that access to information storage facilities is recorded and monitored. Role-based access control mechanism is in place, which restricts access to sensitive data only to authorised persons. Roles and access are regularly reviewed. The employees must sign a confidentiality/non-disclosure agreement.
	All fire doors on the security perimeter of the building have been fitted with alarms that are regularly monitored and tested in conjunction with the walls to establish the required level of resistance in accordance with suitable regional, national and international standards. In addition, the fire alarms operate accordance with the local fire code in a failsafe manner.
	All power and telecommunications lines into the building are installed underground, and they are segregated from telecommunications cables to prevent interference.

Standard / Process	Details
	Controls are in place to restrict access to patch panels and cable rooms.
	An expert has conducted a risk assessment to evaluate if the building may be at risk from terrorist activity. A safe area exists where building occupants can retreat during a terrorist incident.
	An expert has conducted a risk assessment to evaluate how the building may be at risk from fire, earthquake, flood, explosion, civil unrest or any other type of natural or manufactured disaster.
<b>IT System Maintenance</b>	IT systems are maintained in accordance with the manufacturers' recommended service intervals and specifications.
<b>User Information Disposal</b>	<p>Procedures are in place to delete User information from IT systems such that the information cannot be retrieved when IT systems are required to be disposed of or reused.</p> <p>Storage devices containing sensitive information are physically destroyed or securely overwritten rather than using the standard delete function to make the original information non-retrievable.</p> <p>The physically destroyed pieces of equipment are recorded in an inventory file.</p> <p>All equipment containing storage media items must be checked to ensure that any sensitive data and licensed software have been removed or overwritten before disposal.</p> <p>Damaged storage devices containing sensitive data will require a risk assessment to determine if the items should be destroyed, repaired or discarded.</p>
	<p>The DSB maintains processes and procedures for the secure disposal of User information, including paper-based secure disposal and any supporting storage media (i.e., hard drives etc.). This includes the secure transport and storage of User information before destruction.</p>
	<p>The DSB retention period for sensitive information is based on business needs and legal requirements. For example, specific transaction details and correspondence may be retained until the time limit for claims regarding the transaction has expired, which is usually 6 years after the event giving rise to a claim, or to comply with regulatory requirements regarding the retention of such data.</p>
<b>User Info: Operational Procedures</b>	<p>The DSB maintains operational procedures for all IT systems used to access, manage, store or process User information or access to User IT systems. This includes:</p> <ul style="list-style-type: none"> <li>• Technical vulnerability and patch management</li> <li>• Network management</li> <li>• A regular check of compliance with security implementation standards</li> </ul>
	Access to network or systems are restricted only to authorized users.
	Information systems are regularly checked for compliance with security implementation standards.

Standard / Process	Details
	<p>The DSB manages the software download and installation process on systems that store, host and/or process User data in the following way:</p> <ul style="list-style-type: none"> <li>Secure software download and installation procedures are documented</li> <li>Require approval to download and install the software</li> <li>Prohibit users from downloading and installing unapproved software</li> <li>Monitor the environment to identify new and legacy unapproved software download/installations</li> </ul>
<b>Virus Protection</b>	The DSB maintains an anti-virus/malware policy (and user awareness procedures) which covers workstations, services, mobile devices for the detection, prevention, containment and recovery to protect against malware.
<b>Info and Software Backup / Recovery</b>	The DSB maintains a backup and recovery policy, standards and procedures for how systems, applications and data backups are performed - including scheduling, testing and recovery.
	Backup copies of information and software are taken and tested regularly in accordance with the agreed backup policy. They are stored in one of the DSB locations, and the recoverability of data and software is periodically verified.
	Backup copies of data containing User information are encrypted.
<b>User Access</b>	The DSB maintains an access management policy, standard(s), and procedures that cover authentication, password management, entitlements and segregation of duties around this application.
	The DSB ensure segregation of duties to reduce opportunities for unauthorised or unintentional modification or misuse of the organisation's assets. This includes separating duties between individuals who request access, authorise access, enable access, and verify access.
	<p>The process for provisioning and de-provisioning user accounts includes:</p> <ul style="list-style-type: none"> <li>Change requests are reviewed for appropriateness and approved</li> <li>Access rights appropriately modified to reflect changes in responsibility, including transfer and termination</li> <li>Reports or other authorisation lists of user access rights are reviewed at least annually</li> <li>Remote access is only granted to the DSB from their authorized company laptops</li> <li>Each User is uniquely identified with a user ID at the platform and network level</li> <li>Special privileges allow security account set-up and administration limited to a segregated security administration function</li> </ul>
	<p>Processes are implemented to ensure all violations and/or unauthorised activities are monitored/reviewed and addressed promptly by the proper management level - as per the ISO27001 framework.</p> <p>Additionally, logs are created to identify users or attempted use and modification or attempted modification of critical systems components, including files, registry entries, configurations, network and server security settings/parameters, and audit logs.</p>
<b>Network Management / Access</b>	An up-to-date topology (a network diagram) is documented and maintained with sufficient detail to manage the IT network and its security. Controls are in place to limit disclosure of information about the IT network and topologies to external parties.
	All IT networks used to provide a service to the group (and accessed from an external connection) are monitored for malicious activity.

Standard / Process	Details
	The network is managed and controlled, protected from threats, and maintain security for the IT systems using the network, including User information in transit within the IT network.
<b>Authentication Security</b>	DSB management adheres to ISO/IEC 27001-aligned authentication controls as defined in the DSB's access management policy.
<b>External / Remote Network Access</b>	The IT networks used to manage the platform are strictly controlled and subject to the following restrictions: <ul style="list-style-type: none"> <li>• These networks can only be accessed from the DSB authorized company laptop and secure remote access networks on remote control protocols.</li> <li>• Storage devices are restricted</li> <li>• Network traffic is restricted to defined entry points, and VPN traffic is controlled to the expected source IP</li> <li>• Additionally, client-server login/access is audited</li> <li>• All firewall activity is logged</li> </ul>
	Remote access connectivity to User-related data is required for employees or any other third party (e.g., suppliers) via an encrypted VPN into a management server. This access requires authorisation and is audited.
	Remote access requests reviewed for appropriateness, approved, and only granted to the DSB from their authorized company laptops Remote access is appropriately modified to reflect changes in responsibility, including transfer and termination
	System logging and monitoring are performed on remote user activities once within the environment.
<b>Network Segregation</b>	Segregation is maintained between the IT network used to provide service to the User, the network used to provide services to other customers, and the networks used by other parts of the third-party Supplier's IT network. Firewalls are used for DMZ (Internet-facing systems).
	The network architecture segregates pre-production and production environments.
<b>Firewalls</b>	Access to firewalls and the rule sets they contain is limited to authorised users.
	Firewall rules are reviewed as part of the external security testing programme. Typically, rules are disabled for a fortnight before being deleted. Additionally, all firewall configurations for legacy customers are removed.
<b>Other Technology</b>	Wireless technology is not used to transmit User Information or access User IT systems.
	VoIP technology is not used to access User Information or User IT systems.
<b>Intrusion Detection and Prevention</b>	Intrusion detection and prevention controls are implemented to protect against unauthorised attacks or change. They are configured: <ul style="list-style-type: none"> <li>• to alert when unauthorised and suspicious activity is detected</li> <li>• analyse suspected intrusions; and</li> <li>• identify and respond to new attacks</li> </ul>
<b>Audit Logs</b>	The DSB retains all login and event log activities from the monitoring and logging services. These are stored in centralised cloud storage location.

Standard / Process	Details
<b>Personally Identifiable Information (PII)</b>	Protection is enforced by using the third-party services inbuilt operations. Logging facilities and log information are safeguarded against tampering and unauthorized access to Personally Identifiable Information (PII).
<b>User Activity Monitoring</b>	The DSB records all login and access attempts across all infrastructure locations.
	Only those individuals whose role requires them to manage/maintain logging and monitoring services have administrative access.
<b>Data Leakage Policy</b>	The DSB has controls in place to prevent data leakage through removable storage devices. Accepted use is only permission to encrypt devices before saving data onto the device.
<b>Environment Segregation</b>	Development, test, and operational facilities are segregated to reduce the risks of unauthorised access or changes to the operational IT systems.
<b>Change Management Process</b>	<p>The DSB maintains a documented change management process that covers:</p> <ul style="list-style-type: none"> <li>• Network Changes</li> <li>• Application Software Changes</li> <li>• Database Changes</li> <li>• Physical Environment Changes,</li> </ul> <p><b>(Change Management Process)</b></p>
	<p>The Change Management Process has appropriate controls in place to manage changes to the environment, including the following:</p> <ul style="list-style-type: none"> <li>• Clearly identified roles and responsibilities</li> <li>• Impact or risk analysis of the change request</li> <li>• Testing before implementation of change</li> <li>• Authorisation and approval</li> <li>• Post-installation validation</li> <li>• A 'recover position' so that IT systems can recover from failed changes or unexpected results</li> <li>• Backout or recovery plans</li> </ul>
<b>Patch Management</b>	<p>The DSB's patch management procedures related to User relevant systems include the following:</p> <ul style="list-style-type: none"> <li>• Process for determining if vendors have released new patches and hotfixes</li> <li>• The timeframe in which patches are installed once the vendor has released it</li> <li>• If patches are tested before installing them on a production system</li> </ul>
<b>Technical Standards</b>	Technical workflows are in place for applying emergency fixes to IT systems used to provide services to the User.
<b>Release Management</b>	The DSB maintains a release management process that requires that releases are subject to change and version control.
<b>Capacity Management</b>	The DSB maintains capacity management processes to ensure that IT systems monitor, tune, and provide projections of future capacity requirements to ensure system performance.



Standard / Process	Details
	<p>The capacity management process takes into account the following before new applications, systems, upgrades/updates and new versions are pushed into the production environment:</p> <ul style="list-style-type: none"> <li>• Performance and capacity requirements to ensure adequate capacity and system resources to deliver the required system performance</li> <li>• Error recovery and contingency plans</li> <li>• Preparation and testing of routing operation procedures</li> <li>• Agreed onset of security controls</li> <li>• Effective manual procedures</li> <li>• Analysis outlining the potential impact of the change on existing systems and the organisation's overall security</li> <li>• Training in the operation or use of the new system</li> </ul>
<b>Acceptance Criteria</b>	The DSB has acceptance criteria that must be met for new IT systems, upgrades and new versions.
<b>Monitoring InfoSec Events</b>	<p>The DSB maintains policies, processes and procedures to monitor Information Security events. These policies include:</p> <ul style="list-style-type: none"> <li>• Reporting of incident requirements and processes</li> <li>• Reporting of security weakness</li> <li>• Process of evidence collection, analysis and remediation of an incident</li> <li>• Post-mortems and resulting actions are taken</li> <li>• The capture of unauthorised access and unsuccessful access attempt</li> <li>• The creation, modification and use of privileged user accounts</li> <li>• The monitoring of support and development staff activity in production environments</li> <li>• Unauthorised devices cannot be connected to the network without being approved</li> <li>• Alerts from network gateways and firewalls</li> <li>• Alerts from intrusion detection and prevention systems</li> </ul>
	<p>The DSB has standard practices and processes in place to baseline and monitor system activities, exceptions and information security events which include the following:</p> <ul style="list-style-type: none"> <li>• Audit logs include relevant event details such as user IDs, dates, times and details of an event, changes to system configuration, files, protocols, etc.</li> <li>• Monitoring system use includes details for authorised access, privileged operations such as privileged accounts, unauthorised access attempts, system alerts or failures and changes to or attempts to change system security settings and controls</li> <li>• Protection of logging and monitoring systems against tampering and unauthorised access</li> </ul>
<b>Privileged user activity logs</b>	Privileged user activity logs are independently reviewed by users whose activity is not included in the logs.
<b>Logging</b>	The DSB logs faults, analyses them and takes any required action.
<b>Remote Devices</b>	The DSB maintains a policy on and restricts personal devices on the network that could access User information or User IT systems.
<b>Open-Source Software</b>	The DSB uses Open-Source software and maintains the appropriate software updates to ensure application governance.
<b>Source Code</b>	The DSB restricts access to program source code to prevent the introduction of unauthorised functionality and to avoid unintentional changes.

Standard / Process	Details
<b>Penetration Testing</b>	<p>The DSB performs regular network vulnerability scanning. The scanning includes checking external IPs to analyse network vulnerabilities, identifying the open ports, which software listens to these ports, checking the software is vulnerable, security settings, etc.).</p> <p>Intrusion detection and monitoring services are used for network audits. The output of the scanning is reviewed by the InfoSec team. It contains the vulnerabilities, their description and recommendation for the fix. The issues are registered and tracked.</p> <p>The scans are repeated until all issues are fixed.</p>
<b>Incident Reporting Process</b>	<p>The DSB maintains defined, implemented and maintained information security incident reporting processes that include:</p> <ul style="list-style-type: none"> <li>• A defined escalation process to the User (In the event of loss of User data) within one business day</li> <li>• Investigate and remediate service disruptions caused by system or human error, such as failure to run a nightly batch job per service requirements</li> <li>• Responses to information security-related incidents are prioritised, tracked, escalated and resolved</li> </ul>
<b>Internal Reviews</b>	<p>The DSB conducts internal reviews at planned intervals to determine whether the control objectives, controls, processes and procedures:</p> <ul style="list-style-type: none"> <li>• Conform to the requirements of their information security management framework and relevant legislation or regulations;</li> <li>• Conform to the contractual information security requirements;</li> <li>• Are effectively implemented and maintained; and</li> <li>• Perform as expected</li> </ul>
<b>Building / Hardware Protection</b>	<p>DSB systems operate entirely in the cloud. The IT systems and data centres used for the DSB are designed to:- protect IT systems from natural and manufactured hazards;- provide lockable server racks for IT systems;- segregate power cables from communications cables to prevent interference;- manage the temperature and humidity of IT systems in accordance with equipment manufacturer recommendations;- provide layered security zoning within the building;- protect the physical security perimeter from unauthorised access, damage, and threats; -provide resilience; and- detect unauthorised access.</p>
<b>Power Supplies etc.</b>	<p>All power supplies, temperature and humidity equipment used in the DSB data centres use:</p> <ul style="list-style-type: none"> <li>• uninterruptible power supplies (UPS) with a battery capacity to perform a controlled shutdown;</li> <li>• resilience to maintain service during maintenance;</li> <li>• surge protection equipment;</li> <li>• backup electricity generators; and</li> <li>• emergency lighting</li> </ul> <p>The DSB data centres emergency equipment, including fire alarms, uninterruptible power supplies, backup electricity generators, emergency lighting and temperature and humidity equipment, are serviced and tested in accordance with manufacturer recommendations.</p>
<b>Monitoring</b>	<p>The DSB employs monitoring for IT systems in real-time.</p>

Standard / Process	Details
<b>BCP and DR</b>	Please refer to the DSB Disaster Recovery and Business Continuity Policy which contains full details of the disaster recovery and business continuity policies and procedures.
<b>External Party Details</b>	The datacentres are AWS located in: <ul style="list-style-type: none"> <li>• AWS EU West region, Republic of Ireland; and</li> <li>• AWS US East region, N. Virginia</li> </ul>
	Etrading Software Ltd is the Managed Services Provider (MSP).
	The DSB data is encrypted to at least AES-256 bit encryption during transmission to any external party.
<b>External Party Management</b>	All external parties have signed data confidentiality and a non-disclosure agreement.