



POLICY DOCUMENT

IT Policy

Document no: 6.0.2022

Version: 8.0

Responsible: Vice President of Systems Technology

Approved by the Board of Directors on 15th December 2022

Table of Contents

1.	BACKGROUND AND PURPOSE	1
2.	AUDIENCE	1
3.	POLICY STATEMENT	1
3.1	IT STRATEGY	1
3.1.1	IT Governance	1
3.2	GOVERNANCE	2
3.3	IT DELIVERY	3
3.4	IT RESOURCES, SOFTWARE, AND INFRASTRUCTURE	3
4.	DATA PROTECTION	3
5.	EXCEPTIONS.....	4
6.	MONITORING OF COMPLIANCE.....	4
7.	ROLES AND RESPONSIBILITIES	5
8.	REVIEWS AND UPDATES.....	5
9.	REFERENCES TO ASSOCIATED DOCUMENTS	5

1. BACKGROUND AND PURPOSE

The purpose of this IT Policy (the “**Policy**”) for Catena Media plc (the “**Company**”) and its subsidiaries (jointly referred to as the “**Catena Group**”) is to ensure that IT governance is performed in a cost-effective way and contributes to efficient business processes and ensures that business goals are met.

A distinction is made between IT security, which are the processes and controls for handling information in IT systems and networks, and information security, which encompasses all handling of information in the company, and is dealt with by the Company’s [information security policy](#).

The IT policy shall aim to ensure that:

- A business-driven effective IT governance is established and maintained
- IT is performed in accordance with the defined strategy

The Vice President of Systems Technology is ultimately responsible for ensuring the rules and principles in this Policy are adhered to.

2. AUDIENCE

This Policy applies to all directors, employees (including interns, apprentices, trainees, and third party hired), independent contractors, founders on earn-out and other similarly contracted workers (collectively known as “**Relevant Persons**”).

3. POLICY STATEMENT

IT in Catena Group shall support the business, directly or indirectly, in managing information and to be an integrated part to meet the business goals.

The IT policy shall constitute a comprehensive and high-level framework that works as an overall guideline within the IT organisation.

3.1 IT STRATEGY

IT in Catena Group shall be governed by the following IT Strategic goals, based on three perspectives:

- Support the product organization with an appropriate development organization having the correct skills and numbers
- Support the operational organization by providing appropriate IT services like servers, networks and other infrastructure needed for the provisioning of Catena’s websites and services
- Provide Catena Media with appropriate internal IT functions to support all offices and departments with adequate capacity

3.1.1 IT Governance

IT Service Management (ITSM) is based on ITIL 4 as a framework and adopts agile as a methodology.

Financial steering

IT is responsible for the budget regarding all IT related costs such as, but not limited to, infrastructure, operations, and development. Major investments needed are decided on by the group management team.

Key performance indicators

The following KPIs for IT performance are established and monitored continuously:

- Software development efficiency (Velocity)
- Site uptime(s)
- Response time to request tickets

The IT strategy principles define how IT within Catena Group shall meet the expectations from business and shall support Catena Group's business strategy.

3.2 GOVERNANCE

- IT Service Management (ITSM) is based on ITIL 4 and adopts agile as a methodology
- Strategic IT decisions in the Catena Group shall be made by the Vice President of Systems Technology, supported by advice from the members of the management team
- Catena Group shall have a defined IT architecture that describes the rules for the construction of Catena Group's IT environment and infrastructure. The IT architecture is fundamental for development and management of IT solutions within Catena Group
- The system architecture shall state all systems including classification and dependencies
- System management shall be in place. System management includes defined roles and responsibilities, according to system architecture
- The Catena Group shall aim to reduce dependencies on key personnel, through competence sharing and process and system documentation
- IT systems, applications and IT infrastructure documentation shall be periodically reviewed by stakeholders of the systems
- IT systems, applications and IT infrastructure will be built and operated with due regard for privacy of the individual
- IT systems, applications and IT infrastructure shall follow the rules and principles presented in the Company's:
 - [Information Security Policy](#)
 - [Data Protection Policy](#)
 - IT Development Procedure

- [Privacy by Design and by Default Procedure](#)
- Data Protection Impact Assessment Procedure
- Password Procedure

3.3 IT DELIVERY

- IT shall be managed, process oriented and as closely aligned to established best practices such as but not limited to ITIL 4 and agile methodologies.
- IT shall be managed according to this policy as well as the IT strategic goals set by management.
- Development of IT shall follow a decided process, with decision points to ensure that it is based on clearly defined business requirements and in accordance with the principles found in the Company's IT development procedure
- IT supplier agreements shall be established. Each business unit shall continuously review their supplier agreements to ensure that agreements are in place and clearly defined with updated SLA and Data Processing Agreements, as the case might be, which are subject for systematic monitoring
- The availability of IT services shall be adapted to the business demands and needs

3.4 IT RESOURCES, SOFTWARE, AND INFRASTRUCTURE

Relevant Persons are informed about the principles that apply to the workplace equipment which they have access to as a Relevant Person of the Catena Group, including conditions for ordering and using IT equipment during their onboarding and through the Company's [Information Security Policy](#). As much as is possible, Relevant Persons of the Catena Group are not permitted to use workplace equipment for personal use.

4. DATA PROTECTION

Data protection shall be an integrated part of the Company's IT organisation.

Any IT systems, applications, and infrastructure when built in-house, outsourced, or purchased shall have a built-in ability to enable the Catena Group to comply with data protection laws, including the General Data Protection Regulation (the "GDPR").

This includes, for example:

- An ability to meet highest industry standards in security and integrity of data to prevent unauthorized access or data breaches
- Collection and use of personal data shall be limited to specific purposes, and minimized to comply with data protection laws

- Structure and organization of personal data in any software and technology (including that of third-party suppliers) shall be in a way to enable Catena Media to respect retention periods for how long data is kept, respond to data subject requests etc.

Relevant Persons must also ensure that any software or technology built in-house, outsourced or purchased is in line with the Company's [Privacy by design and by default procedure](#).

If processing of a set of personal data may represent a high risk for individuals' rights and freedoms, the Company shall make a Data Protection Impact Assessment (the "DPIA"). This includes software or technology that were to be used by the Catena Group. The rules and procedures to be followed when conducting a DPIA are dealt with in the Company's data protection impact assessment procedure.

The "privacy by design and privacy by default procedure" and "data protection impact assessment procedure" shall be read for further guidance.

5. EXCEPTIONS

Any need for exceptions to this policy must be clearly defined and documented using Appendix 1 by the relevant entity. All exception requests shall be communicated in writing to the policy owner, who is responsible for approval.

Exceptions shall be time limited and in the exception request there shall be a plan for how and when to comply.

6. MONITORING OF COMPLIANCE

The following requirements shall be monitored to determine if this policy is complied with by the Business Units:

- An IT strategy shall be in place and being updated according to the business strategy
- The IT operations are performed in accordance with the defined and updated IT Strategy
- Decision making shall be performed in such a way that it is ensured that IT supports business needs
- There shall be an IT architecture which is maintained to be up to date
- Servers shall be up-to-date according to the patch procedure
- Delivery shall be performed in an effective way based on defined IT processes
- A defined business continuity plan and disaster recovery plan shall be in place
- An internal IT audit process shall be in place and performed annually
- Measure and monitor according to previous years in accordance with yearly plans

7. ROLES AND RESPONSIBILITIES

All Relevant Persons are individually responsible for ensuring their adherence to this Policy.

The Vice President of Systems Technology is responsible for reviewing and updating this Policy.

8. REVIEWS AND UPDATES

The IT Policy shall be reviewed, updated, and adopted when deemed necessary or appropriate, however, no less than annually.

The IT Policy shall be reviewed and updated by the Vice President of Systems Technology and adopted by the Board of Directors.

9. REFERENCES TO ASSOCIATED DOCUMENTS

- [Information Security Policy](#)
- Disaster Recovery Plan (DRP)
- Business Continuity Plan (BCP)
- IT Development Procedure
- [Data Protection Policy](#)
- [Privacy by Design and by Default Procedure](#)
- Data Protection Impact Assessment Procedure.
- [Processor Management Procedure](#)
- IT Equipment Request Procedure
- Patch Procedure Document

APPENDIX 1**Policy Exception Request**

Please use as much space as required to complete the following information. The more complete, and comprehensive your reason for exemption and implementation of mitigation controls, the better your case for an exception. Attach separate documentation if items you have already prepared address criteria in this template.

Complete this form and return via email to:

1. Vice President of systems Technology

I. - Business and/or research case:

1. Description of exception being requested (policy number, technology, process, etc.).

2. Explanation for why exception is being requested. Detail explanation of inability to utilize existing standard, process, technology, etc.