
	Quality, security, business continuity and personal data protection policy	PL01	Rev. 05_EN
			04/06/2025

# Quality, security, business continuity and personal data protection policy

REVISIONS INDEX					
VERSION	DATE	SUBJECT	DRAFTED	VERIFIED	APPROVED
Rev. 01	28/02/2017	First document emission	RSGSI	RDF	DIR
Rev. 02	30/11/2019	Integration about SaaS provisioning	RSGSI	RDF	DIR
Rev. 03	02/11/2022	Periodic revision and contents confirmation	RSGSI	RDF	DIR
Rev. 04	15/11/2023	Periodic revision for logo update and content confirmation	RGQ	RGQ	DIR
Rev.05	04/06/2025	Review for inclusion of additional information security principles and objectives	RGQ	RGQ	DIR

## Summary

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## Policy

Nova S.r.l. operates in the software development and creation of IT services market which stands out for its **high level of competition, constant evolution** and comparison with **increasingly complex scenarios**.

These scenarios constitute a constant challenge and require ever greater attention to the quality of the products, the linearity and effectiveness of the services provided, the security of the information managed on behalf of the clientele, the **business continuity** for the critical processes of the customers and users in general and finally to the protection of the **personal data processed**.

Success in dealing with all this is only possible when all **workers and collaborators** are ready to **respond to the needs** that arise outside and inside the company, therefore it is essential to define guided paths of growth and company qualification by meeting the requirements of satisfaction of the customer, human resources and, more generally, of all the interested parties involved.

Customers request a **partnership** with a reliable organisation, with people in whom they can place their trust, people who, in addition to being competent on business issues, prove reliable and available to understand problems and offer solutions.

Nova S.r.l. has therefore decided to engage in a path of growth and internal structuring that leads to ever greater specialisation of its staff to ensure quick and correct responses to a rightly demanding clientele. The path undertaken must lead to an increase in the skills of individuals in specific areas, with the aim of increasing the overall level of company skills in all sectors thanks to the synergies between the various areas. The tool deemed most suitable is an Integrated Management System of:

- ✓ **quality;**
- ✓ **information security;**
- ✓ **business continuity;**
- ✓ **personal data protection.**

### 1 Quality objectives


In adopting an Integrated Management System, Nova S.r.l. established the following quality **principles**:

- respect the laws in force, always and in any case;
- identify and satisfy the customers' requests and expectations, both explicit and implicit;
- ensure the quality of software design, with high attention to the most effective and innovative development methodologies and technologies;
- promptness of interventions to remove any errors;
- traceability of the entire process to ensure a complete and effective analysis and interoperability of the workers, if necessary;
- ensure the quality of the products offered, capable of adequately responding to market demands with the aim of acquiring new customers with a fair price-performance ratio;
- ensure the quality of the services provided, understood as constant attention to the Customer's needs and the costs he incurs compared to the benefits he derives from them;
- ensure a consolidated method that is achieved in the correspondence of what is offered to the customer's needs in compliance with the agreed times;

To pursue these principles, Nova S.r.l. intends to constantly enhance its staff through the following **objectives**:

- a) active participation in company life and real protagonism in its evolution;
- b) economic rewards based on the results achieved;
- c) targeted training that leads to personal growth, constant improvement in the management of interpersonal relationships and the assumption of autonomy and responsibility;
- d) a suitable and comfortable physical and human environment;

Nova S.r.l. is also committed to the continuous improvement of its Quality Management System included in the overall Integrated Management System.

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## 2 Principles and objectives for information security and the protection of personally identifiable information

The **principles** to be followed and applied in information security and protection of personal data are:

- security measures must comply with company business requirements, as well as current regulations and contractual obligations;
- information security and personal data protection are processes that concern everyone;
- individual awareness combined with responsible use of resources plays a fundamental role in achieving the set security objectives;
- the identified security measures must be balanced in the relationship between the related costs and risks;
- security measures must be simple to understand, to facilitate their application;
- it is necessary that information security and personal data protection are planned and integrated into development activities from the initial stages;
- technical and organizational business measures are designed for effective physical and logical access control;
- authorisations to access information must be based on the "need-to-know" principle and the protection of interested parties from the processing of personal data related to company business;
- information security must be continuously monitored in order to carry out effective and efficient cyber threat detection;
- systems and applications are kept up-to-date and their vulnerabilities managed;
- the technical-organisational measures to protect the personally identifiable information processed must comply with regulatory and contractual requirements and be related to the company business.

To pursue these principles Nova S.r.l. is committed to achieving the following **objectives**:

- Ensure the confidentiality, integrity and availability of the information managed in the area of interest;
- Ensure protection of information managed in the area of interest from known and emerging threats;
- Comply with mandatory regulatory requirements;
- Continuously improve the suitability, adequacy and effectiveness of the information security management system;
- The personal data processed on behalf of the Customers represent the information assets that must be protected and defended according to the legislative requirements and the indications of the current published version of the ISO/IEC 27001, ISO/IEC 27017 and ISO/IEC 27018 standards;
- Maintain the risk at levels deemed acceptable and systematically evaluate its probability and impact in order to identify the most appropriate treatment options.


Nova S.r.l. is also committed to the continuous improvement of its Information Security Management System included in the overall Integrated Management System.

## 3 Information security and protection of personally identifiable information in Cloud solutions provisioned by SaaS mode

The IT system offered by Nova S.r.l. it is provided to the Customer via a Cloud solution in SaaS mode, accessible through all the most widely used browsers (Internet Explorer, Google Chrome, Firefox, Safari, Opera, etc.).

Each SaaS user will authenticate themselves by entering personal credentials that will allow profiled personal access, i.e. differentiated by the type of activity for which they are responsible. This profiled access will allow each user to immediately access the information strictly necessary to carry out their business functions, also determining the context in which to operate in the system.

In order to ensure full protection of personally identifiable information, as required by the GDPR and current national legislation, Nova Srl's Cloud system provides all the data necessary for the management of the service, excluding excess data and ensuring availability, integrity and confidentiality of personal data. Nova Srl implements the best international practices of "privacy by design" and "privacy by default" and the security measures envisaged by its integrated management system for quality, operational continuity, IT security and

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protection of personally identifiable data. NOVA S.r.l. SaaS solutions have been designed and developed to allow interoperability with third-party systems in use, in compliance with the Customer's privacy policy.

## 4 Principles and objectives for business continuity

This operational continuity policy aims to define and disseminate to all internal and external stakeholders the commitments undertaken by Nova S.r.l. in relation to operational continuity.

Nova S.r.l., aware of its role and responsibilities within the social and economic community, also intends to stand out for its commitment to operational continuity based on the following **principles**:

- ensure first and foremost, in the event of a disaster or serious accident, the protection and physical security of people;
- prepare to offer an adequate response to manage an interruption of services, including following a disaster;
- improve the ability to resist incidents (resilience) that can lead to interruptions of critical activities;
- carry out all appropriate actions to protect company value, fulfill regulatory obligations and satisfy user needs.

To pursue these principles Nova S.r.l. is committed to achieving the following **objectives**:

- a) carry out a risk assessment to gain an understanding of the level of vulnerability of each operation and its impact;
- b) develop, verify and maintain a business continuity plan that considers the main risks identified and the strategies to counter them, minimizing work interruption and ensuring rapid restoration of activities;
- c) adopt adequate internal procedures to recognise, communicate and respond to incidents in an effective and appropriate way to contain their impact;
- d) include the services provided by suppliers in its plan, coordinating the management of the business continuity process.

The business continuity plan provides for the assignment of clear and specific responsibilities for its management and execution. The plan is developed following international standards and best practices and the requirements and guidelines issued by the Italian public administration.

Nova S.r.l. is also committed to the continuous improvement of its Operational Continuity Management System included in the overall Integrated Management System.

## 5 Integrated Management System

The pursuit of these objectives ensures the achievement of the economic and financial objectives, periodically defined, which allow the Company to invest in its evolution and growth.

The implementation of this policy, a fundamental tool for pursuing the achievement of the objectives defined for all interested parties, is:

- ✓ a daily commitment of all staff;
- ✓ supported financially by the Company through the provision of the necessary technical, economic and human resources;
- ✓ periodically reviewed by Management;
- ✓ transparently subjected to clientele verification;
- ✓ objectively checked by an independent Certification Body.

**This Policy is communicated to all employees and collaborators and published in full on the company website available to interested parties.**