

Information Security Policy

Purpose:

According to the Act on Personal Data Protection and Processing of Personal Data no. 90/2018, Hefring ehf. must ensure adequate security of all personal data. This information security policy describes the company's emphasis on the importance of that obligation. The company's personal data must be protected from all threats, both internal and external, regardless of whether the threats are intentional or negligent. With this policy, employees, customers and others can trust Hefring ehf. intention to safeguard the security of personal data, including for confidentiality, fairness, and availability.

Scope:

This information security policy covers the handling and storage of all personal data in the custody of Hefring ehf. It covers the internal operations of the company and the services that Hefring ehf. provides to its customers on shared or specific equipment, as well as all internal systems, software and hardware owned and/or under full control of Hefring ehf. It also covers premises where personal data is processed, employees and contractual parties who have access to the pertinent data.

Objective:

Hefring ehf. objective with this policy is to:

- Make sure all personal data is correct and accessible to those who have access rights.
- Guarantee the confidentiality of personal data and that confidentiality is maintained in accordance with applicable laws and regulations.
- Protect all personal data is against damage, destruction, or disclosure, regardless of whether it is due to intent or negligence.
- Oversee that all personal data that goes through Hefring ehf. system reaches the correct recipient, undamaged and on time.

- Make sure that the risks involved in processing personal data are within defined risk limits.
- Comply with all laws, regulations and rules concerning the processing of personal data.
- Comply with all agreements to which the company is a party off, and which concern the protection of personal data.
- Report and investigate all deviations, breaches, or suspicions of information security vulnerabilities.
- Constantly work on and improve information security.

Ways to the objective:

Hefring ehf. approaches to the above objectives are to:

- Keep records of information assets where personal data can be found, whether in electronic form or on paper, and classify it according to the nature and importance of confidentiality.
- Regularly analyze, through a formal risk assessment, the risks that the processing of personal data may entail for individuals.
- Manage the risk of processing personal information within defined limits by operating an information security management system.
- Perform an impact assessment on privacy if it is likely that a particular type of processing could pose a significant risk to the freedom and/or rights of individuals, such as when it comes to implementing new systems that host or otherwise process personal data.
- Maintain a quality manual with procedures and procedures for processing personal data.
- Have all Hefring ehf. employees receive regular training and education regarding the security of personal information and the responsibility that rests on them.
- Make sure all employees comply with applicable laws and regulations.

Responsibility:

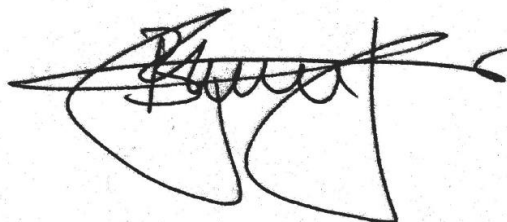
- Hefring ehf. Board of Directors is responsible for this information security policy and to review it regularly.
- Hefring ehf. CEO is responsible for the implementation and the day-to-day management of the policy.
- Hefring ehf. Data Protection Officer shall ensure that staff receive appropriate training on the security of personal information.
- All Hefring ehf. employees must work in accordance with the information security policy. They should report security breaches and vulnerabilities related to information security. Those who deliberately threaten Hefring ehf. information security face litigation or other appropriate legal action.

Audit:

This policy should be reviewed annually and more frequently if necessary to ensure that it is in line with Hefring ehf. objectives.

Approval

Approved by Hefring ehf. Board of Directors on board meeting 12.10.2021.

A handwritten signature in black ink, appearing to be "Björn Jónsson". The signature is stylized with a large, sweeping initial letter and a long horizontal stroke extending to the right.

Björn Jónsson

Chief Operating Officer

Chairman of the Board of Directors and secretary of the meeting