



# Information Security Principles & Policies

## THE COMPANY'S STRUCTURE AND BUSINESS ACTIVITY

Economic Capital Solutions Limited, trading as Monte Carlo Plus ("the Company"), is an independent risk management software and consulting company. The Company is registered in England and Wales (Registration No: 9131856). Its registered office is in Jubilee House, East Beach, Lytham St Annes, FY8 5FT. The Company is VAT registered (VAT Registration No: 213 0265 62) and has profitably operated since 2014 with no debts.

The Company develops risk management software and provides advisory services to well-known financial firms. All our clients are regulated by the Financial Conduct Authority or the Prudential Regulation Authority.

## HIGH-LEVEL INFORMATION PROTECTION PRINCIPLES & POLICIES

The Company's business model is based on creating intellectual property and software solutions for risk management for financial firms. Therefore, information & information protection is critical to the success of our business. As a result of this, we focus on three aspects of information, namely confidentiality, integrity, and availability of information. These are defined as follows.

Confidentiality of information: only authorized persons have the right to access information.  
The integrity of information: only authorized persons can change the information.  
Availability of information: the information must be accessible to authorized persons whenever it is needed.

We have a systematic approach to protecting information. Our Information Security Management System (ISMS) consists of processes, technology and people in order to protect and manage all our information through effective risk management.

The firm's ISMS is based on the following high-level policies:

1. identify stakeholders;
2. identify which risks exist;
3. define controls and other mitigations to meet the risks;
4. set clear objectives on what needs to be achieved with information security;
5. implement all the controls and other risk treatment methods;
6. continuously measure if the implemented controls perform as expected; and
7. make continuous improvements to make the whole ISMS work better.

Since we develop risk management solutions ourselves our philosophy is to lead by example and have a best practice for managing information security risks: find out where the risks are, and then systematically treat them, through the implementation of security controls (or safeguards). Managing information security is not only about IT security (i.e., firewalls, anti-virus, etc.), but also about managing processes, legal protection, managing human resources, physical protection, etc.