Version	Date	Approver Role
01	3/17/2025	CEO

Information Security Policy

The purpose of this Information Security Policy is to enable NEARBY COMPUTING to become, to the greatest extent possible, a reliable actor in security matters for its clients. Consequently, the primary objective is to safeguard NEARBY COMPUTING's operational assets and the information they process, ensuring protection against loss of availability, confidentiality, and integrity throughout their entire lifecycle.

As an essential part of this policy, an Information Security Management System (hereinafter referred to as ISMS) has been developed and implemented in compliance with applicable standards. This serves as the organizational and methodological base for initiating, rigorously maintaining, and regularly updating actions related to this policy, as well as ensuring its continuous improvement. These objectives are pursued through the following principles:

- The information related to all operational procedures associated with the company's product and service catalog must always be protected against loss of availability, confidentiality, and integrity.

- The storage and processing of generated and received information will be segmented to ensure that each information element is accessed only by authorized individuals with a legitimate need to know.

- Resources will be allocated to ensure continuous compliance with applicable regulatory, contractual, and legal requirements in Spain, Europe, and any other regions or countries where the company operates.

- A Security Committee will evaluate the criticality of NEARBY COMPUTING's information assets, from which a risk analysis and subsequent risk management process will be derived. Both the analysis and management of risks will be reviewed annually by the Management. Each identified risk will be addressed with prevention and mitigation actions detailed in the Risk Treatment Plan.

- Security incidents will be communicated and addressed appropriately based on their impact, according to a Management and Continuity Plan.

- Clear procedures with identified responsibilities will be established to comply with this Security Policy.

- The General Security Officer will be responsible for maintaining this policy, its management manual, and associated procedures, as well as supporting their implementation.

- Each employee is responsible for adhering to this Policy and its procedures as applicable to their job role.

- NEARBY COMPUTING's policy is to implement, maintain, and monitor the ISMS.

This policy was initially approved by the Security Committee and finally ratified by the Board of Directors of NEARBY COMPUTING. It must be reviewed annually.