



Information security policy
Data classification: PUBLIC

Information Security Policy

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Overview

UpCloud is a cloud service platform provider. Our information security objectives are aligned with the company strategy and are recognised by our executive management as essential to reaching our business goals. We protect our customers' data and our business based on relevant risks. This document applies to all UpCloud employees and any third parties that have access to UpCloud data.

Objectives

The objectives of security management at UpCloud are to ensure that:

- We maintain an acceptable level of compliance.
- We protect our own and our customers' assets against relevant threats.
- We are resilient against data breaches.
- We continuously assess the effectiveness of our security management system.
- Risk management and feedback from our employees and customers drive the continuous improvement of our security posture and security management in the company.

Information security management

The Information Security Management System (ISMS) at UpCloud is aligned with the ISO 27001 standard and UpCloud Risk Management Policy. Security incident management and business continuity management processes are driven by the security objectives.

Our policies define mandatory requirements regarding security aspects for both administrative and operational practices of information systems and computer networks. It is every employee's responsibility to follow the company's security & privacy policies and to report security violations or vulnerabilities upon encountering them.

Privacy management

UpCloud recognizes there is no privacy without security. We are transparent, ethical and operate in compliance with applicable data protection laws. Privacy at UpCloud includes data protection laws, communications privacy and sector specific privacy requirements.

UpCloud has designated a Data Protection Officer to guide us in our privacy activities. Internally our



privacy commitment is contained in the Data Protection Policy, and externally described in the relevant Privacy Notices.

Software security management

As a cloud provider UpCloud is at heart a software development company and we acknowledge the importance of good software security practices. Requirements and mandatory actions for ensuring software security are stated in our Software Lifecycle Security Policy. The policy guides design and development teams in how to consider security aspects early-on in the software creation process, allowing us to focus security efforts where it matters the most.

Security and maintainability are key factors in choosing our development partners and suppliers. UpCloud operates a bug bounty program and a vulnerability disclosure program for the general public.

Management roles definitions

Our definition of security includes information security, privacy and software security.

To ensure the fulfilment of our security objectives, the management of information security and software security is integrated to the mandate of UpCloud Chief Information Security Officer (CISO). The CISO reports to the Chief Operating Officer (COO). CISO & CEO report the state of security to the Board of Directors. Privacy is led by the Data Protection Officer (DPO) who reports to the CISO.

UpCloud security management is driven by the risk governance and assessments according to UpClouds Risk Management Policy. The CISO assesses, reviews and oversees treatment of security risks related to our operations.

Skilled and security-aware employees are the key to our success and management provides the support of, tools and instructions for everyone to perform their work in a secure manner and as per requirements set by the management.

Relevant policies and guidelines

The implementation of our Information security policy is supported through other policies, all of which are available to employees via our company intranet and document share. Relevant guidelines are provided when necessary. Together, the documents describe UpCloud's Information Security Management System (ISMS).



Approval and update

Information Security Policy is owned by the CEO and delegated to the CISO. The document undergoes a yearly review by UpCloud CISO & CEO.

This document has been approved by the CEO on 5.3.2025

Version	Date	Note
1.0	January 03, 2023	Released and valid, moved to general drive.
1.01	May 03, 2023	Added mention of bug bounty program.
1.1	March 08, 2024	Policy annual review, changes in organization.
1.2	March 05, 2025	Policy annual review.

