MedNet Greece Security Policy

The Information Security Policy concerns MedNet GREECE SA 's informational and the communicational assets that support the supply of **Integrated Solutions, Management, Auditing, and Consulting Services to Insurance Companies and Health Care Organizations**. It covers the whole scope of the information that are transferred, processed or saved in electronic version or in hard copy version during the execution of the mentioned above procedures taking into account the requirements of all interested parties.

Activities take place at:

- **Company Headquarters** (3, Pergamou St., Nea Smyrni, Greece) which include 2 basements – ground floor – 1st floor – 2nd floor – 3rd floor – 4th floor – 5th floor – 6th floor – 7th floor, areas of common use and roof.
- **Consulting offices** at:
    1. **Metropolitan Hospital** (9, Ethnarchou Makariou Av. & 1, El. Venizelou St., Neo Faliro, Greece)
    2. **Hygeia Hospital** (4, Erythrou Stavrou St. & Kifisias Av., Marousi, Greece)
    3. **Mitera** (6, Erythrou Stavrou St., Marousi, Greece)
    4. **Euroclinic Athens** (9, Athanasiadou St. & D. Soutsou St., Athens, Greece)
    5. **Euroclinic Children's Hospital** (39-41, Lemesou St. & 209, Acharnon Av., Athens, Greece)
    6. **Athens Medical Centre** (5-7, Distomou St., Marousi, Greece)
    7. **Athens Medical Group, Psychiko Clinic** (1, Andersen St., Psychiko, Greece)
    8. **Iaso** (37-39, Kifisias Av., Marousi, Greece)
    9. **Hospital Centre "Henry Dunant"** (107, Mesogion Av., Athens, Greece)
    10. **Kentriki Kliniki** (Asklipiou 31, Athens)
    11. **Mediterraneo Hospital** (Ilias 8-12, Glyfada)
- **Cyprus Branch** (57, Kennedy Av., Nicosia, Cyprus – 1st floor)
- **Romania Branch** (7, David Praporgescu, 2nd District, Bucharest, Romania – 1st floor)

1.1 SECURITY POLICY MANAGEMENT

INTENTION

MedNet assigns high priority to the security of the information and communication assets which support its activities.

SUPPORTING THE IMPLEMENTATION

Top Management of MedNet supports the implementation of the Security Policy, providing the necessary resources and means.

IDENTIFICATION AND ASSESSMENT OF INFORMATION AND COMMUNICATION ASSETS

MedNet shall implement a documented procedure for the identification and risk assessment of the information and communication assets.

ORGANISATIONAL SUPPORT

Aiming at the more effective implementation of the Security Policy, MedNet shall develop the appropriate administrative structure, define the roles required for the management of security, determine the duties of each role and assign the roles to the appropriate people.

LEGAL COMPLIANCE

Top Management and the administrative staff of MedNet shall proceed with all actions required to ensure compliance with law regarding personal data protection, copyright and electronic crime as well as law regarding the use of information and communication assets in general.

1.2 HUMAN RESOURCES

THE ROLE OF HUMAN RESOURCE

MedNet attributes special significance to the role of human resource in the attempt to secure the information and communication assets.

REINFORCING HUMAN RESOURCE

MedNet shall proceed with all required actions to reinforce its personnel with the means, guidance, information and knowledge so that they can contribute, in the more effective way, to the security of the information and communication assets.

OBLIGATION FOR ACTIVE PARTICIPATION

All members of the personnel are obliged to actively contribute to the security of the IT and communication infrastructure of MedNet and refrain from any actions that may endanger the information and communication assets security.

OBLIGATIONS ASSOCIATED WITH THE USE OF THE INFORMATION AND COMMUNICATION ASSETS

The use of the information and communication assets entails responsibilities and obligations which are detailed in MedNet's Code of Ethics.

1.3 TECHNICAL, PHYSICAL AND ENVIRONMENTAL CONTROLS

ADEQUACY OF PROTECTION CONTROLS

MedNet shall install a set of controls for technical, physical and environmental protection and apply procedures able to ensure the implementation of the Security Policy.

ORIENTATION OF PROTECTION CONTROLS

The means of protection should aim at the protection of the information and communication assets against external and internal threats.

THREATS

The means of protection are intended to protect the information and communication assets against both malicious and unintentional actions as well as threats which result from technical and environmental factors.

1.4 SUPPLIERS / PARTNERS

SUPPLIERS AND PARTNERS OBLIGATIONS

The partners and the suppliers of MedNet have the same obligations regarding the security of the information and communication assets, as MedNet's employees.

ENSURING PROTECTION OF PERSONAL DATA

MedNet shall proceed with all actions which ensure that the activities of the suppliers and partners shall not endanger its clients' rights, regarding the protection of their personal data.

PROTECTION OF INFORMATION AND COMMUNICATION ASSETS AGAINST THE ACTIONS OF SUPPLIERS AND PARTNERS

MedNet acknowledges the risks resulting from the activities of its partners and suppliers and shall take all appropriate controls to eliminate them.

MedNet shall implement a documented procedure for the control of suppliers and partners in order to secure its information and communication assets.

1.5 BUSINESS CONTINUITY

EMERGENCY ACKNOWLEDGEMENT AND MITIGATION PLAN DEVELOPMENT

MedNet shall implement a documented procedure for the acknowledgement and risk assessment regarding emergency occurrence for the operation of MedNet and its information and communication assets.

EMERGENCY AWARENESS

The emergency prevention and mitigation plans should be regularly controlled in order to establish the effectiveness of the recovery methods.

1.6 LEGAL COMPLIANCE

COMPLIANCE WITH LEGAL REQUIREMENTS FOR THE PROTECTION OF PERSONAL DATA

MedNet shall proceed with all actions required for the fulfilment of its obligations which are derived from laws and regulations pertaining to the protection of personal data.

PERSONNEL OBLIGATION FOR LEGAL COMPLIANCE

All employees or partners of MedNet are obliged to contribute to the protection of personal data.