Namirial

Company Policy

Quality and Information Security

Category	**IMS Policy**	Document Code	**IMS Policy**	**Namirial S.p.A.**	
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Reviewed by	**Anna Veltri**	Version	**2.0**	**Massimiliano Pellegrini**	
Approved by	**Massimiliano Pellegrini**	Issue Date	**02/10/2025**	_____	

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Change History

Date	Version	Reason for change
11/09/2023	1.0	First draft
02/10/2025	2.0	Update of the list of certifications and declaration

1. General introduction

Namirial S.p.A. is an information technology and web engineering company that has established a specific position within the Information Technology sector by directing its software production toward the new and increasingly evident needs of adapting the Italian production system to highly competitive and globalized economic scenarios.

Within a national economic structure largely characterized by the activity of small and medium-sized enterprises, it was considered essential to develop software solutions and services that are also accessible via the Internet and capable of responding professionally to emerging technological and innovative challenges, while maintaining high-cost efficiency in operations.

The company is headquartered in a modern facility of over two thousand square meters, which hosts an Internet Data Center used as a Disaster Recovery site and equipped with all the security systems necessary to ensure the inviolability of the facility.
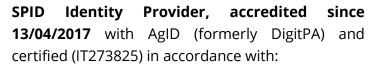
Namirial S.p.A. is:

A Qualified Certification Authority, accredited since 25/07/2016 with AgID (formerly DigitPA), and authorized to issue Qualified Certificates in compliance with Regulation (EU) No. 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market, which repeals Directive 1999/93/EC. It is also authorized to issue CNS Certificates and Time Stamps.

PEC Provider, accredited since 26/02/2007 with AgID (formerly DigitPA), and authorized to manage Certified Electronic Mail (PEC) mailboxes and domains.

SPID Identity Provider, accredited since 13/04/2017 with AgID (formerly DigitPA) and certified (IT273825) in accordance with:

- Prime Ministerial Decree (DPCM) of 24/10/2014;
- Commission Implementing Regulation (EU) 2015/1502;
- Regulation (EU) No. 910/2014 (eIDAS), Article 24;

for the provision of Digital Identification trust services.

Qualified Preservation (Archiving) Service Provider, in compliance with:

- Technical Rules pursuant to Article 71 of the Digital Administration Code;
- Regulation (EU) No. 910/2014 (eIDAS), Article 24;
- Accredited on the AgID Marketplace of qualified preservation service providers since 24/05/2022;

for the provision of Qualified Digital Preservation (Compliant Archiving) trust services.

ISO 9001 certified by Bureau Veritas Italia S.p.A.

ISO/IEC 27001 certified by Bureau Veritas Italia S.p.A.

ISO/IEC 27017 and ISO/IEC 27018 certified by Bureau Veritas Italia S.p.A.

ISO/IEC 37001 certified by Bureau Veritas Italia S.p.A.

	UNI PdR 125:2022 certified for Gender Equality by Bureau Veritas Italia S.p.A.
	Certified as compliant with Regulation (EU) No. 910/2014 (eIDAS) for Qualified Trust Service Providers.
	Adobe certified: since June 2013, Namirial has been a member of the AATL (Adobe Approved Trust List).

2. Objectives and Purpose

Within the scope of its activities, Namirial has always paid particular attention to the following aspects:

- the quality of the products offered and the services provided to its customers;

- the security of the data and information it manages.

Namirial considers information security to be a fundamental element both in relation to the design and development processes of technological solutions and in the provision of services.

These topics are also of particular importance with regard to customer satisfaction and loyalty, as well as in the definition of the operational strategies of the organizational system and in setting medium- and long-term growth and innovation objectives.

From this perspective, Namirial's Management has, over time, implemented an **Integrated Management System (Quality and Information Security)** in compliance with the **UNI EN ISO 9001** and **ISO/IEC 27001** standards, aimed at providing products and/or services resulting from processes developed in

accordance with the criteria established by documented procedures, and subject to certification by an internationally accredited third-party certification body.[1]

Everything related to the management of products and/or services and data deserves to be safeguarded, protected, and handled according to planned and well-structured models capable of ensuring the long-term continuity of corporate resources.

The need to adopt an Integrated Management System is linked to the necessity of responding promptly and effectively to the globalization of markets and to the evolution of ICT systems and supporting technologies.

The Company's Integrated Management System therefore represents the main tool:

- to demonstrate the Company's ability to consistently provide products/services that comply with customer requirements and applicable legal and regulatory requirements, thereby becoming an attractive partner also for medium-to-large companies and enabling the continuation of a positive growth trend;
- to ensure the security of information managed across all company activities and services provided;
- to improve customer satisfaction.

Moreover, this choice is also driven by the need to pursue:

- the effectiveness and efficiency of product/service realization processes, through adaptation to market demands, optimization of management

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[1] Namirial's certificates are publicly available on the dedicated page of the corporate website **Our certifications - Namirial**

times, cost reduction, minimization of environmental impacts, and continuous collaboration with suppliers and partners;

- credibility and trust on the part of stakeholders (including clients) in guaranteeing the confidentiality, integrity, availability, and resilience of their information;
- compliance with laws, regulations, and directives related to data protection;
- the reduction of economic and legal risks resulting from the loss of information relevant to business continuity and stakeholder interests;
- the ability to pursue emerging opportunities in order to improve system capabilities and responsiveness to market demands;
- awareness and involvement at all levels of human resources in the continuous improvement process, as well as awareness of the importance of safeguarding information, especially information considered critical for the protection of personal data and the company's business;
- the continuous pursuit of improvement in its processes and corporate image, and the achievement of business objectives, for which the Company's Management commits to providing all necessary means and support—such as appropriate personnel and infrastructure—while striving to offer a working environment that encourages the improvement of company performance.

3. Management Commitment Statement

This commitment, undertaken by Company Management and communicated and shared with all personnel, has as its essential requirement compliance with, evaluation of, and fulfillment of customer requirements and unexpressed needs, as well as the safeguarding of information with regard to aspects related to:

a) **Confidentiality**: ensuring that information is accessible only to duly authorized individuals and/or processes and that information is not made available or disclosed to unauthorized persons or entities;

b) **Integrity**: safeguarding the accuracy and completeness of information and the methods used to process it, in order to prevent unauthorized

modification and/or deletion, whether due to errors or intentional actions, or as a result of malfunctions and/or damage to technological systems;

c) **Availability**: ensuring that authorized users have access to information and associated assets when required;

d) **Resilience**: ensuring that information systems processing data maintain operational continuity aimed at addressing potential adverse events affecting systems and processes, whether accidental and/or intentional;

e) **Privacy**: ensuring the protection and control of personal data.

This commitment is also intended to support an effective model for the management of strategic, tactical, and operational business risks and/or opportunities, through which management systems can be structured, defined, updated, and kept operational.

Finally, but not least, it aims to address all aspects related to personal safety and prevention, environmental protection, as well as all aspects concerning privacy, for the protection of personal data for which a specific policy consistent with this one has been adopted.

Company Management strongly commits to disseminating and promoting awareness of the importance of information security throughout the organization.

The primary tool for ensuring the effectiveness and adequacy of the Integrated Management System is the commitment of top management; for this reason, the Chief Executive Officer and Namirial's managers review the Integrated Management System as necessary during the formal **Management Review**.

During these reviews, data collected through measurement and monitoring activities are analyzed and compared with objectives and performance indicators, leading to the definition of any necessary changes and/or improvements to ensure that the Integrated Management System remains suitable, adequate, and effective.

The changes and/or improvements defined by top management concern:

- objectives and performance indicators for the following year;

- resources (human, material, economic, and financial) necessary to achieve objectives and to maintain the conformity and effectiveness of the Integrated Management System;

- staff awareness and training programs to ensure correct application of the Integrated Management System;

- internal audit programs required to verify the conformity and effectiveness of the Integrated Management System;

- modifications to the Integrated Management System necessary to reflect Namirial's organizational and evolutionary changes;

- continuous improvement of Integrated Management System processes and information security controls to enhance their effectiveness and efficiency.

The results of the Management Review constitute the reference framework for all activities described in Namirial's Integrated Management System, ensuring consistency with business objectives, which are defined and periodically updated according to strategic and organizational needs.

This policy is reviewed during the Management Review.