



ADRIATIC
LUXURY HOTELS

INFORMATION SECURITY POLICY

At Adriatic Luxury Hotels we are committed to achieving the highest level of information security in all segments of business operations and hotel services in order to adequately protect the confidentiality, integrity and availability of information of our guests, partners and other stakeholders, as well as to achieve the highest protection level of information asset necessary for the fulfilment of the company's mission and maintaining the top quality of our services.

The Information Security Management System is based on a sustainable technological solution that fully reflects the commitment to data protection and protection of information from our guests and partners, our shareholders and investors, ensuring the highest level of availability, reliability, accuracy and irrefutability of all our documented information.

We pay special attention to the protection of personal data, safe and responsible handling of credit card data and payment methods, appropriate use of information and communication technology and other relevant information assets in order to ensure that intellectual and industrial property is handled in accordance with applicable regulations.

We have established a systematic approach that includes documenting, applying, managing, maintaining and implementing all necessary information security processes, procedures and controls, with special emphasis on the development of competencies and awareness of all persons working under the organization's supervision. In this way, the highest level of information security and business continuity is achieved in line with our compliance obligations based on the requirements of all relevant stakeholders.

Top management is fully committed to meeting all applicable information security requirements, as well as to the continuous improvement of the effectiveness of the Information Security Management System. This commitment is embedded in the culture and strategy of our company and is applied, monitored and evaluated in all operational activities in order to ensure continuous improvement. The development of our security policies and controls is also based on the identification of external and internal changes in the organization to ensure the achievement of the highest level of security and timely processing of information security risks.

The direct participation of all persons working under the supervision of Adriatic Luxury Hotels is encouraged by promoting a proactive attitude in the context of constant identification and processing of opportunities for improvement that contribute to the continuous improvement of the performance of the Information Security Management System.

All persons working under the supervision of Adriatic Luxury Hotels must be aware of this Policy and its commitments and apply them in the performance of their activities.

In Dubrovnik, July 30th, 2021

David James Taylor
President of the Management Board