

# **VMI Security-, Operational- and Privacy policy**

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## Introduction

This document applies to VMI IT Services (VAT: SE556518568201 "VMI") and associated subsidiaries.

### Information management

The information that VMI receives access to, whether it's about the customer and its employees, or other data, may only be discussed with the customer's designated sales / project manager. The information is the customer's exclusive asset.

Personnel handling servers may have access to customer information on the servers, but will only act on orders of the designated respective customer contact(s).

VMI's technicians are bound to professional secrecy.

### Access levels

VMI has 3 access levels

- VMI Administrators have access to all information in the internal systems and servers\*
- Financial and administrative staff only have access to VMI's financial system.
- Other staff such as trainees only have access to limited information - not password information, or access to servers.

Information access is based on need-to-know basis.

*\*An exception to this rule is PCI operations where only PCI designated personnel have access to specific servers.*

### Passwords

VMI does not under normal circumstances accept customer-requested passwords.

However, customers are subsequently allowed to change their password in certain services.

VMI recommends that passwords should be a combination of letters and numbers of at least 8 characters. For critical applications, password requirements are higher.

### Personnel security

All personnel responsible for operations have undergone a security screening at the time of employment.

VMI has a Business Continuity Plan in the event of global critical situations such as terrorist attacks, natural disasters or pandemics. The plan is in large part confidential but in practice means that the company can be immediately divided into 2 fully functional entities in different geographical locations.

VMI's travel policy regulates how key personnel in the company are allowed to travel.

In the event of an outbreak of diseases, the company can be operational either completely separately in several offices or by work from home.

### Physical access to servers / data information

In accordance with the EU General Data Protection Regulation (GDPR) and in some cases specific customer agreements, only authorized personnel have physical and logical access to the servers and server information.

VMI manages and is the sole owner of the servers and may upon request present an overview of where your information is stored. Microsoft 365 and AWS services are excluded.

A Data Processing Agreement for GDPR can be downloaded from VMI's website. You may read more under the section **VMI Privacy Policy**.



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## Operations and backup

VMI provides powerful and operational reliable servers with redundant Internet connection. The servers are evenly distributed on the 2 primary sites. These are located at Sollentuna DC2 (Stockholm) and Gärdet DC3 (Stockholm).

A secondary site for long-term archiving of backups is located on Vaddö DC1.

Some applications and services are distributed between the 2 primary sites, to achieve geographical redundancy. In addition to the standard failover (if for example, a server crashes) there is also a disaster plan in the event that one of the primary sites should be disabled.

### **Under circumstances where VMI is responsible for the daily backup of servers, the following conditions apply:**

All backup sets are password protected and stored securely.

### **Backups are performed in VMI's server locations as described:**

The servers are backed up by so-called snapshots where identical copies of the servers are stored and are ready to boot \*\* on the other DC site.

The snapshot frequency is normally once every hour.

### **The backup set levels vary depending on the customer agreement. By default, the backup data is saved as described:**

- The snapshot backup is stored once every hour, or once a day.
- Every day, the content is consolidated into a daily backup.
- The daily backups are saved every day of the week.
- The last day of the week is stored for one month.
- The last day of each month is saved for one year.
- The last day of the year is saved for 1-3 years depending on service.

Backup files are mirrored between DC2 and DC3. After 30 days, older backups are transferred to DC1 for long-term archiving. Backup media itself is not encrypted but storage is fragmented.

\*\* VMI offers full geographical redundancy as an additional service.

VMI verifies the integrity of backup files on a weekly basis. Unless otherwise agreed upon, it is the customer's responsibility to carry out random checks on the backup data. The customer may request such service to be carried out by VMI by separate agreement.

This document describes in general terms the standard model for VMI's backup routines. Depending on the service and agreement, the policy may be different from the standard model.

When scrapping unencrypted storage media, VMI ensures that old storage space is not readable, by using as an example the ZFS COV method.

When hardware, such as hard drives, is obsolete they are physically destroyed by a 40-ton industrial press machine. This is done by decision of VMI.



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## **Routines**

VMI has a team that ensures 24/7 coverage concerning critical problems that may occur for all services provided by VMI. VMI performs manual checks to verify the integrity of the services as well automatic ones.

## **Firewall and intrusion policy**

The firewall policies are strictly configured to only have the necessary ports open and handles blocking of attacks, as well as prioritization and reporting.

All servers have a standard IP protection which only allows access from specific IP addresses or series, any access can be managed via VPN.

In addition, VMI offers IDS/IPS services for customers to detect and stop potential incidents.

## **Staffing**

- Fully staffed during prime shift (weekdays 7:00 a.m. to 5:00 p.m.) and standby during off shift weekdays.
- Staffing is available standby off shift during weekends.
- Problem determination of service outages or disruptions normally begin immediately (weekdays 7:00 a.m to 5:00 p.m.) and within 30 minutes (weekends) after alarm notification.
- Problem determination of customer-specific problems are made during prime shift (weekdays 7:00 a.m. to 5:00 p.m) unless the otherwise agreed upon.
- Customers have the possibility to upgrade to a 24/7 service agreement.

VMI uses Zabbix and Elastic for internal and external operational monitoring.

Certain information about the security policy is confidential due to trade secrecy and may not be mentioned in this document.

## **Risk assessment**

VMI conducts on a regular basis risk assessment to identify and analyse potential events that may impact individuals, assets and/or the IT environment negatively.

As part of the process, the resilience of the IT environment, managed by VMI, is considered and as well the routines to prevent and handle incidents. Server operations, web hosting network services are services covered by the risk assessment. Unless separately agreed upon, customer specific risk assessments are not performed.

Twice a year, a major analysis is performed. Once a month, a general analysis is performed.

In both cases, the result is handled with confidentiality and with a follow-up on the previous analysis results.



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## General information about servers and premises

All technical equipment has one or more backup capabilities.

VMI offers both physical and geographical redundancy depending on the provided service.

VMI has 3 sites of which 2 are primary and 1 backup.

- Bäckvägen 18A - Sollentuna DC2 (Stockholm).
- Sandhamngatan 63 - Gärdet DC3 (Stockholm)
- Hantverkarsvägen 15 - Vaddö DC1 (Norrtälje)

The server operation is based on modern servers from Dell or Supermicro. Storage is based on different techniques, such as storage media with both mechanical and SSD storage.

All storage units rely on redundancy which prevents data loss.

DC2 and DC3 are outsourced with infrastructure such as cooling and electricity provided by subcontractors.

Sollentuna datacenter have a MSB class 3 rating (<https://rib.msb.se/filer/pdf/27280.pdf>)

## Connections

VMI server premises have redundant Internet connections which are based on BGP routing. VMI co-operates with several independent Internet providers such as Telia, Telenor, DGC and Tele2. The connections from the suppliers are independent of each other.

The performance and capacity are confidential.

## Server facility information - VMI DC2 (Sollentuna)

The owner of the facility is Conapto AB.

### Physical security

- Security in several sections with different levels
- Code-protected access card to the building and to the server locations
- Camera surveillance
- Escorted access to all servers (valid for the managed hosting sections)
- Temperature alarm, liquid alarm and alarm from the cooling machine control 24/7
- Fire classification EI60
- Alarm class 3

### Electricity supply

- Own switchgear with 1250 A input.
- Diesel generator with less than two minutes to full load 300 KVA
- 3 x Liebert Nxa UPS 60 KVA, 2 x UPS Enaco, with more than 30 minutes capacity via high security accumulators.
- This UPS is connected to a UPS cluster with a distribution panel that can handle up to 5 UPSs, total capacity 300 Kva.N + 1 redundant.
- Protective earthing according to electricity and telecommunications standards.
- 16 or 32 Amp fuse. All racks have at least two different supplies from different power stations.

### Climate control

- Average temperature of 23°C +/- 2°C and a relative humidity 50% +/- 10%
- Air filtration
- 12 separate cooling pipes, and coolant placed on the roof to minimize energy consumption for the cooling of the premises.

### Fire detection and extinguishing

- Fully automatic Inergen fire extinguishing system
- Active fire detection in combination with smoke detector

### Monitoring

- All equipment is monitored with an integrated problem management system with immediate response 24/7/365
- DC (DataCenter) Sollentuna is protected against intrusion and sabotage. All doors are equipped with control code-protected access card systems.
- The facility is visually monitored (by NOC) with night-vision cameras in a different location.
- Monitoring of temperature, power supply, indications of fire, humidity, cooling system and access control. All alarms are connected to our monitoring center (NOC) with staffing 24/7/365.

### Access

- By zoning and an advanced access control system with the addition of a Co-Location service (with full-height rack availability) VMI may allow access to the facility 24/7/365. This gives you access to the equipment whenever any need arises.



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## **Fire and smoke**

- All premises are fire classified according to the EI60 standard and in the event of a fire, the rooms are automatically filled with Inergen, a gas that effectively suffocates all types of fires by lowering the oxygen level of the air.
- DataCenter Sollentuna is connected to a central UPS facility (Uninterruptible Power Supply) which guarantees that daily production is not affected by temporary power outages. UPS is N + 1 redundant. At longer power outages and emergencies activate a backup system with powerful diesel generators that supplies the entire facility with electricity.

## **Cold, heat and moisture**

- To give the optimal operating environmental conditions for the IT systems, the premises are equipped with cooling systems that control temperature and humidity.



## VMI Privacy Policy

VMI IT Services AB (556518-5682 "VMI", "we", "us"), protects and respects your privacy. This privacy policy describes what personal information we collect from you and how we process your personal information.

### Personal information that we collect from you

We may collect personal information about you, which includes, but is not limited to, your name, your contact information and other relevant information, directly from you or e.g. from your CV.

Our most important sources concerning your personal information are:

- meetings with you
- correspondence by telephone and e-mail

### How do we use your personal information?

Your personal information will be collected and handled by us for the following purposes:

1. Documentation of web hosting and server services
2. Finances / Debiting

Our use of your information as listed above is permitted under current Swedish law as it is:

- treated with your consent, e.g. in connection with a written subscription / rental agreement
- necessary for our legitimate interests to fulfil the above stated purposes, as well as to fulfil legal obligations.

### How long do we store your personal information?

We will only store your personal data for as long as it is necessary, for the purpose of the processing or as long as you want to receive our information.

Usually it is for 3 years. You can contact us at any time and ask us to delete your personal information.

If you have questions, please contact us at: [info@vmi.se](mailto:info@vmi.se)

### Share with third parties

To facilitate our use of your information and provide you with information or to answer a request you make, we may share your information with a third party. This will only happen in the following circumstances:

- **With suppliers and partners:** sometimes we can collaborate with other companies and individuals to perform tasks for us. Examples of this are registration of domain names or so-called ssl certificate. Such partners have access to your personal information only to the extent necessary to perform these duties and may not use the information for other purposes. These recipients are bound by similar privacy and privacy commitments as VMI.
- **With authorities or law enforcement agencies** if we are obliged to do so.

### Where your personal information is stored and processed

As described in the section above "Share with third parties", we share your personal information with third parties such as suppliers, contractors and partners. If we use a third-party provider, contractor or partner, your personal information will still be under our control and we have procedures in place to ensure that your personal information is adequately protected.

We strive to take the reasonable steps required to ensure that your personal information is processed securely and in accordance with this policy.

## Data security

Although we will do our best to protect your personal information, you should be aware that the transfer of information via the Internet is not completely secure and we cannot guarantee the security of your personal information sent via email or other channels to third parties.

Therefore, each transfer is at your own risk. We will follow strict procedures and adequate technical and organizational security measures to prevent unauthorized access, alteration, deletion or transfer of this personal information.

## Your rights, how you access, correct and delete your personal information

According to current data protection laws, you have the following rights:

- **Right to access and to receive a copy of your personal information:** You have the right to receive an answer as to whether we handle your personal data. If this is the case, you have the right to access your personal information and information on how it is processed. You can also request a copy of your information.
- **Right to correct your personal information:** If you can show that the personal information we have about you is incorrect, you can request that this information is updated or corrected.
- **Right to be forgotten / have data deleted:** You have the right to delete your personal data; however, VMI may by law be required to save certain information, e.g. if you have been employed by us.

To exercise your rights, email us at [info@vmi.se](mailto:info@vmi.se).

As our processing of your personal information is based on your consent, you also have the right to revoke your consent at any time. The revocation of your consent does not affect the legality of any processing based on your consent before we have received such revocation.

You also have the right to complain about our processing of your personal information to the responsible data protection authority.



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## Policy Information

### Changes to this policy

The terms of this policy may change from time to time. We publish significant changes to this policy either through notices on this site or by contacting you through other channels.

### Additional policies

VMI has additional policies which may be specific according to customer regulated agreements.

### Contact

You are welcome to contact us with questions and comments about this privacy policy and about your personal information at our email address [info@vmi.se](mailto:info@vmi.se).

You can also reach our local data protection representative at the same email address.

Policy signed by Einar Sköthagen CEO of VMI IT Services AB

A handwritten signature in blue ink, appearing to read 'Einar Sköthagen'.

2023-02-16