

ELA'S ACCESS CONTROL POLICY

1. **Epure, Lizac si Asociatii SCA** ("ELA") controls access to information on the basis of business and security requirements.
2. Access control rules and rights to applications, expressed in standard user profiles, for each user / group of users are clearly stated, together with the business requirements met by the controls.
3. The security requirements of each business application are determined by a risk assessment that identifies all information related to the application and the risks to that information.
4. The access rights to each application must take into account the following:
 - a. Existence of premises access control – unauthorized persons shall be prevented from gaining physical access to premises, buildings or rooms where data processing systems are located.
 - b. Existence of system access control – access to data processing systems is prevented from being used without authorization.
 - c. Existence of data access control – persons entitled to use a data processing system gain access only to the data to which they have a right of access.
 - d. Fact that personal data cannot be read, copied, modified or removed without authorization.
 - e. Application of classification levels to information processed within each application and consistency between the classification levels and access control requirements across ELA's systems and network(s).
 - f. Fact that user initiated changes to information classification labels are prohibited.
 - g. Fact that user initiated changes to user permissions are prohibited.
 - h. Fact that users will only obtain access privileges in the performance of their specific roles and on a need-to-use and event-by-event basis.
5. ELA has standard user access profiles for common roles within it.
6. User access requests, authorization and administration are segregated and are subject to formal authorization, to periodic review and to removal.

Document Owner and Approval

The Managing Partner is the owner of this document and shall ensure that it is kept up to date. A current version of this document is available to all members of staff on ELA's website on page "Data Protection", section "Policies & Procedures". This policy was approved by Decision of Partners on 15.02.2018 and is issued under the signature of the Managing Partner.

Signature: Doru Epure – Managing Partner

Date: 15.02.2018