

# Security Policy of Sparebank 1 Nord-Norge

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This document is Sparebank 1 Nord-Norge's security policy. It will support our 5 strategic objectives, especially the objectives of Quality, Number 1, Rate of Return and Workplace. That this security policy would get us any fans might be a challenge, but by coming across as reliable and good at dealing with incidents, confidence in Sparebank 1 Nord-Norge will grow.

<b>Person in Charge</b>	CEO of Sparebank 1 Nord-Norge AS
<b>Decided by</b>	The Board of Directors in Sparebank1 Nord-Norge AS
<b>Applies to</b>	Sparebank 1 Nord-Norge AS
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Written by:  
Thomas Paulsen

Status:  
Approved

Version:  
1.0

Last modified:  
07.05.2020

## Revision history

Date	Version	Description	Author
20.03.2019	0.1	First draft	Thomas Paulsen
05.05.2019	0.2	Revised after feedback from DPO	Thomas Paulsen
01.11.2019	0.9	Changed bank cooperation to Sparebank 1 Utvikling	Thomas Paulsen
01.11.2019	1.0	Security Policy in SNN - Published	Thomas Paulsen

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## 1. BACKGROUND AND OBJECTIVE

SpareBank 1 is a strong brand and a major operator in the Norwegian financial services market. It is therefore important to have a policy that provides a satisfactory level of security and contributes to an appropriate organisation of the security work and compliance with the applicable legal requirements. Sparebank 1 Nord-Norge has also been selected as a socially critical enterprise by the National Security Authority. We are therefore committed to taking the work on security and information security seriously. We are in addition a major operator in Northern Norwegian societies and someone which the general public places great trust in.

When preparing this policy, we have based it on Sparebank 1 Utvikling's *Security Policy for the SpareBank 1 Alliance* for which the banks' representatives in the SpareBank 1 Alliance's Security Council have provided their input.

This policy applies to all companies in the Sparebank 1 Nord-Norge Group.

## 2. SECURITY OBJECTIVES

The overall objective of all security work in SpareBank 1 Nord-Norge AS is through a systematic and risk-based approach to:

- Protect the lives and health of employees, customers and visitors.
- Secure SpareBank 1 Nord-Norge AS' values and reputation, as well as the information that is processed.
- Ensure that authorities, customers, employees and partners have confidence that information is processed in a satisfactory manner.
- Ensure that the security work supports the at any given time applicable business and risk strategy.
- Ensure secure and steady operation.
- Ensure that we at any given time comply with the requirements for security work of the applicable laws and regulations, including to protect the privacy of our customers and employees.

Confidentiality, integrity and accessibility must be weighted on the basis of business needs and the risk scenario.

## 3. ORGANISATION AND RESPONSIBILITY

Security shall be included as a natural process in the day-to-day operations, and the necessary capacity and expertise to meet the security needs must be available. In addition, the data protection legislation states that robustness is important for covering that side of the regulatory requirements.

### 3.1 Board of Directors

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The Board of Directors has the overall responsibility for the security work and has been informed of this policy.

## 3.2 CEO

The CEO is responsible for the day-to-day security work. The CEO *may* delegate the execution of the security work to one or more defined roles.

## 3.3 Managers and Employees

Managers have the operational security responsibility for their areas and each employee and hired staff are responsible for familiarising themselves with the rules for security and for complying with them.

## 3.4 Risk Management Department

Is responsible for establishing methods, tools, systems and procedures for the good, efficient and overall management and control of operational risk in the organisation. The Risk Management Department is also responsible for supporting and challenging the Board, the management and the rest of the organisation to ensure professional management of operational risk, as well as producing relevant reporting in this area so that the Board and management are continuously updated on the development and level of risk.

## 3.5 Compliance Department

Is responsible for identifying, assessing, advising, monitoring and reporting the Group's compliance risk.

## 3.6 Data Protection Officer

DPO is a central, advisory, coordinating, controlling and reporting role throughout the organisation in relation to compliance with the data protection regulations.

## 3.7 Security Manager

Is responsible for the Group's security work and will continuously assess the threat scenario together with the joint security resources in the alliance. The Security Manager manages the Group's crisis management team.

## 3.8 Information Security Manager

Shall ensure that the reliability and security that is associated with the collection, transfer and storage of information in Sparebank1 Nord-Norge follow the laws and regulations as well as internal requirements and guidelines that are applicable at any given time for this subject area. The role shall

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include to be an adviser to the Group Management and the Board in the event that they need clarifications in connection with the processing of matters related to the subject area.

## 3.9 The Bank's relationship with Sparebank 1 Utvikling

SB1 Development (SB1U) is the coordinator and facilitator for security activities in the SpareBank 1 Alliance and assists Sparebank 1 Nord-Norge with expertise and implementation of processes. SB1U's responsibilities to the banks and companies are regulated in separate service agreements, including operational security work, common infrastructure and relationships with subcontractors. Sparebank 1 Nord is the premise provider for solutions which they provide for their customers through SB1U. SB1U can be the premise provide for individual companies when this is agreed.

## 4. MANAGEMENT SYSTEM AND CONTROL

The security work shall be carried out in accordance with a security management system. The security management system provides the necessary structure and guidance for security and combines all policy documents that are relevant for the security work. Sparebank 1 Nord-Norge uses the SB1U security management system, but makes an ongoing assessment of whether a separate management system needs to be established.

Our joint ISMS is based on an ISO 27001 framework to ensure that it covers all areas related to the information security work.

## 5. RISK ASSESSMENT

Risk assessment of systems, locations, deliveries, processes and measures that are important for the business shall be carried out. The objective of the risk assessment is to detect risks, determine security requirements and appropriate security measures. The risk assessment execution shall be made in accordance with established standards.

## 6. SECURITY MEASURES

Sparebank 1 Nord-Norge and SB1U shall take appropriate measures to ensure the security of customers, personnel, equipment, locations, systems and information, as well as carry out the necessary security training and awareness-raising work for all personnel performing tasks for the SpareBank 1 Nord-Norge Group.

## 7. OUTSOURCING AND PROCUREMENT

Outsourcing of activities shall take place in accordance with the established policy for outsourcing and shall be dealt with by the Board when necessary. All procurement shall be made in accordance with internal policy documents.

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## 8. DEVELOPMENT AND CHANGE MANAGEMENT

Before a developed or modified solution is put into production, a risk assessment and necessary testing should be carried out. The solution can be put into ordinary operation when the person responsible has accepted the risk.

## 9. SYSTEM MAINTENANCE AND OPERATION

Operation and system maintenance shall be carried out in a proper manner and according to the current policy documents. Development resources can be given certain tasks related to system maintenance and operation.

## 10. INCIDENT MANAGEMENT AND EMERGENCY PREPAREDNESS

All employees have a notification duty in the event of suspected or detected security incidents. Sparebank 1 Nord-Norge shall follow SpareBank 1's joint emergency and business continuity plans, and have established its own emergency plan with a description of emergency solutions. Training, exercises and testing of the plans shall be carried out on a regular basis.

## 11. DEVIATION MANAGEMENT

The Board of Directors authorises the CEO to approve deviations from the provisions of this policy. The Board of Directors shall be kept informed of such deviations.

## 12. DEFINITION OF KEY CONCEPTS

**Common Infrastructure:** Common infrastructure means areas such as Internet Bank/Portal(s), common office channel applications, web servers, common networks (trunk networks), Internet connections, Internet mail services, common firewalls and connections to external operators.

## REFERENCES

[1] Sparebank 1 Utvikling's Security Policy – Approved by the Board 13.03.2019.  
<https://biblioteket.intern.sparebank1.no/display/BUS/Sikkerhetspolicy>