

FIN-POL-012

# Information Security Policy

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*A structured approach to protecting  
confidential and sensitive information*

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**Finova Policy**

*Built on Integrity, Discipline and Trust*

December 2025



**Finova Trading FZE LLC**

Call & WhatsApp: +971 56 126 2623 ❖ +44 7714 612701

Email: [info@finovatrading.com](mailto:info@finovatrading.com)

Web: <https://finovatrading.com>

## Document Control

Item	Detail
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### 1. Policy Statement

Finova is committed to protecting the confidentiality, integrity, and availability of information entrusted to it. Information security is fundamental to maintaining trust, safeguarding sensitive data, and ensuring the responsible conduct of Finova's activities.

This policy sets out how Finova approaches information security in a structured, proportionate, and risk-based manner.

### 2. Our Approach to Information Security

Finova recognises that information security risk arises from a range of sources, including unauthorised access, misuse, loss, or compromise of information.

The firm adopts a risk-based approach to information security, applying controls that are proportionate to the sensitivity, value, and criticality of information held or processed. Security considerations are embedded into everyday operations rather than treated as a purely technical or reactive function.

Finova expects all those acting on its behalf to handle information responsibly and with appropriate care.

### 3. How Information is Protected

In practice, Finova:

- classifies information based on sensitivity and intended use,
- restricts access to information on a need-to-know basis,
- applies appropriate technical and organisational safeguards, and
- takes reasonable steps to protect information from loss, misuse, or unauthorised disclosure.

Information security controls are applied across physical, digital, and operational environments and are reviewed as risks evolve.

### 4. Use of Systems and Information

Information and systems provided or approved by Finova must be used appropriately and for legitimate business purposes.

Unauthorised access, disclosure, alteration, or destruction of information is not permitted. Finova does not tolerate behaviour that compromises information security, whether intentional or accidental.

## 5. Third Parties and Information Sharing

Finova recognises that information security risk may arise when information is shared with third parties, including partners, service providers, or counterparties.

Information is shared only where there is a legitimate business need and appropriate safeguards are in place. Finova will not engage with third parties where information security risk cannot be adequately managed.

## 6. Governance and Oversight

Responsibility for information security sits with Finova's management, supported by appropriate oversight and escalation mechanisms.

Information security incidents, suspected breaches, or weaknesses must be escalated promptly so that appropriate action can be taken.

Finova reserves the right to suspend or terminate access to systems or information where security concerns arise.

## 7. Alignment with Recognised Information Security Principles

Finova's approach to information security is informed by recognised information security management principles, including those reflected in frameworks such as ISO 27001.

References to such frameworks guide approach and structure, without implying certification or formal accreditation.

## 8. Review and Continuous Improvement

This policy is reviewed periodically to ensure it remains appropriate, effective, and aligned with Finova's activities and operating environment.

Information security risks evolve continuously, and Finova's approach will adapt as necessary to reflect changes in technology, threat landscape, and operational practice.

 End of Policy 

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