



Information Security Policy

Given the nature of our activities, we at BLACKBOARD CONSULTING S.L. (hereinafter, BLACKBOARD) recognise that information (including customer data, operational assessments, training records, strategic plans and intellectual property) is a strategic asset of significant value to our organisation and our customers. It therefore requires rigorous protection and management to ensure business continuity and minimise the impact of potential incidents affecting the confidentiality, integrity or availability of information.

Accordingly, through the establishment, implementation and maintenance of its Information Security Management System (ISMS) in accordance with ISO/IEC 27001:2022, BLACKBOARD formally undertakes the following commitments:

- To develop solutions, services and operations that comply with the legal, regulatory and contractual requirements applicable to the corporate security and data protection sector.
- To ensure that information systems, databases and technology platforms are accessed and used securely, with appropriate authorisation and in accordance with established policies.
- To conduct periodic information security risk assessments to identify, prioritise and implement the controls needed to mitigate identified risks.
- To promote continual improvement of the ISMS based on incident analysis, audit results, operational metrics and periodic management reviews.
- To develop, maintain and test business continuity and disaster recovery plans to ensure the availability of critical services and the technology platform.
- To protect and monitor information throughout all its stages (creation, storage, processing, transmission and secure destruction) to prevent improper or unauthorised use.
- To implement technical and organisational measures to prevent, detect and respond to malicious software and emerging cyber threats.
- To protect intellectual property rights, the source code of the SaaS platform and the confidentiality of customer information held in our custody.
- To safeguard the brand's reputation by ensuring high standards of cybersecurity, discretion and data protection.
- To provide ongoing information security training and awareness programmes for all personnel and external collaborators.
- To periodically establish security objectives and indicators to measure ISMS performance and assess the effectiveness of controls.
- To act at all times in accordance with the strictest principles of professional ethics, diligence and confidentiality.

BLACKBOARD is firmly committed to providing all the human, technical and financial resources necessary to establish, maintain and continually improve the Information Security Management System (ISMS).

CEO

Madrid, 15 July 2026 - Rev. 00