



## ACDEON B.V.

Gasthuisplaats 1  
2611 BN Delft  
The Netherlands

Chamber of Commerce number: 97878421  
VAT ID nr.: NL868271834B01  
Bank Account [EUR]: NL09BUNQ2159258024  
Bank Account [USD]: WISE 250768783669566

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### ACDEON - Information Security & Data Governance Overview

#### Executive summary

This document describes how ACDEON organises information security and data governance in a pragmatic way, drawing on principles from ISO/IEC 27001 and ISO/IEC 27701 but without claiming formal certification. It is aimed at customers, represented manufacturers and partners who want to understand how information is handled and protected.

#### Scope of activities

ACDEON's registered business scope is:

Het verlenen van advies en dienstverlening aan bedrijven in het Verenigd Koninkrijk en de Europese Unie, waaronder het optreden als vertegenwoordiger van een of meerdere ondernemingen. De activiteiten zijn gericht op de hightech industrie, waaronder de lucht- en ruimtevaart, defensiegerelateerde industrie, maritieme sector, agrarische industrie, de automobielandustrie en de semi-conductor industrie.

As a result, ACDEON processes mainly business-to-business information: project enquiries, technical and commercial

correspondence, and contact data for engineers, buyers and managers in the sectors mentioned above.

#### 1. Information classification

To structure its approach, ACDEON distinguishes between the following types of information:

##### - Public

Website content, marketing material and general product information that may be shared freely.

##### - Internal

Operational notes, internal planning and non-sensitive correspondence that is not intended for external publication

but is not highly confidential either.

##### - Confidential

Customer and partner enquiries containing business-sensitive details, draft proposals, pricing information or other

material that requires careful handling. This is the category that typically deserves the most protection.

#### 2. Risk-based approach

ACDEON follows a pragmatic, risk-based approach:

- Identify realistic risks (e.g. loss or theft of a laptop, unauthorised mailbox access, misdirected email attachment).

- Implement practical controls where the potential impact is non-trivial.



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- Avoid excessive bureaucracy that does not add real protection at ACDEON's scale.

Examples of typical risks and measures:

- Risk: unauthorised access to email or cloud storage.

Measure: strong authentication, 2FA, careful device security.

- Risk: accidental sending of information to the wrong recipient.

Measure: careful address selection, awareness and corrective follow-up if needed.

- Risk: loss of local device.

Measure: full-disk encryption where available and remote access protection.

### 3. Data flows

Typical data flows for ACDEON include:

- Website visitor submits a contact request with business contact details and an enquiry.

- ACDEON reviews the request and, where relevant, shares technical or commercial details with a represented manufacturer to explore solutions or quotations.

- Email and documents are stored on EU-based infrastructure or reputable cloud services used by ACDEON, subject to security and privacy review.

These flows are kept as simple as possible to limit complexity and risk.

### 4. Privacy by design and by default

ACDEON incorporates privacy considerations into decisions and defaults, for example:

- Collect only the minimum data needed to respond effectively to an enquiry.
- Avoid the use of intrusive marketing trackers or profiling tools.
- Configure analytics in a cookieless, privacy-friendly mode (Matomo on EU-based infrastructure).
- Prefer tools and configurations that support strong security and GDPR alignment by design.

### 5. Accountability and documentation

While ACDEON operates on a modest scale, it recognises its accountability under the GDPR and related Dutch law.

This includes:

- Keeping a clear overview of the main systems and the types of data they contain (email, website, analytics, backups).
- Documenting key policies and practices (such as this overview, the privacy document and the security baseline).
- Being able to explain to customers, represented manufacturers and authorities how personal data is handled.

### 6. Alignment with standards and regulations

ACDEON does not claim formal certification under ISO/IEC 27001, ISO/IEC 27701 or NIS2. However:



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- The principles of these frameworks - such as risk-based thinking, defined responsibilities, continuous improvement and appropriate controls - are used as guidance.
  - ACDEON aims to remain aligned with the requirements of the GDPR and the expectations of the Dutch Data Protection Authority.
  - Where sector-specific expectations arise from customers or represented manufacturers, ACDEON is willing to explain and, where appropriate, further strengthen controls.

### 7. Relationship with other ACDEON documents

This governance overview should be read together with:

- ACDEON Privacy & Data Protection Overview - focused on personal data and GDPR rights.
- ACDEON Security Baseline - focused on technical and organisational security controls.

Together, these documents provide a coherent picture of how ACDEON approaches information security and data governance.

### Document version and status

Document: ACDEON Information Security & Data Governance Overview

This document reflects ACDEON's governance practices as of 9 December 2025.

It is reviewed periodically and may be updated when ACDEON's services, systems or risk environment change.