

Information Security Policy

Introduction

The security and protection of information is fundamental to the effective and efficient working of the Company and the maintenance of confidentiality. This Policy provides a framework within which allows us to handle information and data in the most secure way, given the demands of the service. Security is everyone's responsibility and all personnel working in the Company must make every effort to comply with this Policy.

The company operates a system that regularly evaluates its processes and customer needs and has set quantifiable objectives with plans in place to ensure that they are reviewed year on year for improvement.

The company is committed to continually improving the effectiveness of the information Security management system, and to prevent unauthorised access and use within the company and working environment.

Key Information

The need for the policy

We recognize that preparing for and preventing breaches have become inseparable from insuring a cyber loss. With the increasing need for pre-breach and cyber security breaches, this policy will mitigate risks to the company. Furthermore, to meet legal and professional requirements and satisfy obligations to our clients, the company must use cost effective security measures to safeguard its information resources. This Company Security Policy will ensure a consistent approach to the implementation of appropriate security controls against common threats.

Everyone who acts on the Company's behalf are required to adhere to this policy when undertaking their duties or when representing the Company in any other guise.

The Policy

The Policy of the Company is to accept willingly all obligations in respect of information security and to protect its information resources by implementing recognised industry best practices that will achieve a balance between cost and risk. Interr will complete risk assessments on all company information security assets, equipment, items, documents, systems (not limited to) to assess any potential vulnerabilities and risks in lines with 'Confidentiality, Integrity and Availability' model and actions to mitigate these risks.

Applicability

The Policy shall apply to all staff of the Company and any other professionals using or interfacing with the IT resources of the Company.

Implementation

The requirements of the Policy shall be implemented by all Directors, staff and other professionals using the Companies IT resources.

Any member of staff noting any area of conflict between this Policy and any other Company Policy must bring it to the attention of the HR & Compliance Director, immediately for conflict resolution. Interr, will in any case be responsible for the routine periodic review of the Policy. Staff have an obligation to report suspected breaches of the Policy immediately to the HR & Compliance Director. Internal audits will independently review and assess the adequacy of implemented security measures including compliance with the Policy.

External audits and/or penetration audits will be conducted as and when required.

Compliance with the Policy is the duty of all Directors and all staff. In serious cases, failure to comply with the Policy may be a disciplinary matter and could also result in a breach of the law or a criminal offence.

Protection of information during audit testing

Protecting information systems during audit testing is crucial to maintain the integrity of the audit process and prevent unintended disruptions to the normal operation of systems.

The company will prioritise the security of information being audited, which involves using controlled environments and using only approved auditing bodies to minimise the risk of unintended consequences.

Interr may use anonymized or simulated data during testing to protect the confidentiality of sensitive information. This approach allows for the assessment of systems without exposing actual data to unnecessary risk.

Prior to initiating audit testing, we will perform comprehensive backups of critical systems and data. This precautionary step provides a safety net for restoring systems to their original state in the event of unexpected issues.

Interr will also conduct thorough post-testing validation to confirm that systems and data have been restored to their pre-testing states. This step ensures that no residual impact lingers after the completion of audit activities.

Documentation of all audit testing activities, including methodologies, findings, and remediation steps will be kept for a minimum of three years. This documentation serves as an audit trail, providing a comprehensive record of the testing process.

By integrating security considerations into audit testing methodologies and fostering a culture of continuous improvement, organizations can uphold the highest standards of information protection while reaping the benefits of a robust audit process.

Information Resources

The Policy applies to all information whether spoken, written, printed or computer-based, which is owned, held in the custody of, or used by the company. The Policy also applies to all resources used in creating, processing, transmitting, storing, using or controlling that information.

Objectives

The objectives of the Policy are to ensure that:

- Information is protected from unauthorised access, disclosure, modification or loss.
- Information is authentic.
- Information and equipment are protected from accidental or malicious damage.
- Security risks are properly identified, assessed, recorded and managed.
- Safeguards to reduce risks are implemented at an acceptable cost.
- Audit records on the use of information are created and maintained as necessary.
- All legal, regulatory and contractual requirements and standards of due care are met.
- Confidentiality of information will be assured
- Integrity of information will be maintained
- Availability of information for the business processes will be maintained
- Business continuity plans are maintained and tested
- Information security training will be available for all employees
- All actual or suspected information security breaches will be reported to the Company Security Co-Ordinator and will be thoroughly investigated

These objectives shall be achieved through the implementation of security controls as described in the remaining sections of this Policy.

Company Security Coordinator

CFO is the nominated Security Co-Ordinator for the Company and shall:

- Develop and manage the Company security programme.
- Develop, issue and maintain the IT security strategy and Policy
- Develop a strategic IT Disaster Recovery & Service Continuity Plan and advise the Company on its implementation.
- Create an information security awareness programme to include whole Company briefings, training and education.
- Provide information security consulting support to the Company.
- Investigate breaches of security and report findings and recommended action to the Company.

- Implement a compliance programme to evaluate the effectiveness of the information security programme.
- Report annually to management review meeting on the effectiveness of the overall information security programme.

Legal Obligations

General

The Company accepts its obligations to comply with the laws of the United Kingdom and EU. All members of the Company must be aware that there are legal requirements relating to information that must be met.

The principles of these are detailed below:

GDPR and Data Protection Act

Information held electronically that relates to individuals is subject to the Data Protection Act, that places obligations on those who record and use personal data and the organisation for which the work.

The HR & Compliance Director is the appointed Data Protection Officer and is responsible for registration matters with the Office of the Data Protection Registrar, application of the Data Protection Principles and the briefing of all Data Users within the team.

Software Copyright, Information Products and Intellectual property rights

Intellectual property (IRP) rights include software or documents copyright, design rights, trademarks, patents and source code licences. Software is protected by the Copyright, Designs and Patents Act 1988, which state that 'the owner of the copyright has the exclusive right to copy the work'.

The company will only acquire software through known and reputable sources, maintain appropriate assets registers and comply with the terms and conditions for the relevant software. The company will not be duplicating, converting or copying in any way other than permitted by law and will regularly that only authorised software and licences products are installed and maintain proof and evidence of ownership of licences, master disks, manuals, etc.

Unless contractually agreed, the Company will own all Intellectual Property and Inventions that any staff employee by the Company produces in the course of their employment duties absolutely. Rights and obligations under this section in respect of IP made during their employment shall continue in force after termination of their employment.

Third parties (i.e. individuals not employed by the Company) may be involved in the creation of IPR in conjunction with or on behalf of the company. IPs produced by third parties will not belong to the Company, unless a written agreement transferring the ownership is signed by both, the Company and the third party. All contracts with outside contractors and consultants in any work or IP they produce for the company will belong to Interr Ltd.

Individual members of staff are responsible for ensuring they act within the scope of the law, and seek further advice from their line manager where necessary. Responsibility for clearing rights rests with each individual line manager and should be done in consultation with the CEO/ Director of HR and Compliance.

Breaches of copyright and other IPR may render the individuals to both civil and criminal proceedings. It is illegal to make copies of software without the owner's permission. Penalties include unlimited fines and up to two year in prison. The company will regards wilful or reckless breach of the IPRs as a disciplinary offence and such breaches will be subject to the company's disciplinary procedures.

Computer Misuse Act

The Computer Misuse Act 1990 established three prosecutable offences against unauthorised access to any software or data held on any computer.

The offences are:

- Unauthorised Access to Computer Material
- Unauthorised Access with intent to commit or facilitate the commission of further offences
- Unauthorised Modification of Computer Material

Key Security Controls

Personal Security

- the HR & Compliance Director will ensure that all contracts of employment include a 'non-disclosure clause/confidentiality agreement'.
- the HR & Compliance Director will ensure that security responsibilities are allocated to staff and written into job specifications and terms of reference.
- Security education and training will be provided to all staff as appropriate to their assessed needs.

Security Controls

Principle

Supporting utilities, assets and resources associated with information processing, such as offices, computer equipment, communications media and paper-based records shall be protected from unauthorised access, misuse, damage or theft. Company assets/equipment/systems/cables will be sporadically checked and cables and sockets PAT tested on annual basis. Airconditioning is tested annually. Information security penetration testing and vulnerability testing on the company system's is completed annually.

Storage limitation specifies that - delete Personal data or any other data shall be kept for no longer than is necessary for the purposes for which the personal data are processed. Personal data may be stored for longer periods insofar as it will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with UK GDPR.

Any information held for longer than is necessary carries additional risk and cost. Records and information should only be retained when there is a business need to do so. Personal data must be periodically reviewed and if it is no longer needed it should be deleted or anonymised as appropriate.

In accordance with this policy, all staff are responsible for managing, storing appropriately and disposing of the information they create and receive as part of their normal daily business activities.

Interr recognises the importance of this essential resource and undertakes to:

- manage records effectively in line with this policy
- comply with legal obligations that apply to its records
- exercise best practice in the management of records
- encourage effective access to and use of records as a corporate source of information
- keep records electronically where appropriate, where possible putting in place provision to ensure their reliability
- store records efficiently, utilising appropriate storage methods at all points in their lifecycle, and disposing of them appropriately when they are no longer required
- provide appropriate protection for records from unwanted environmental (fire, flood, infestation) or human impact (alteration, defacement, theft)
- safeguard records necessary for the continuity and regeneration in the event of a disastrous occurrence
- identify and make provision for the preservation of records of long term and historical value
- ensure equipment and equipment supporting facilities are inspected and tested regularly or sporadically as and when needed
- all assets, equipment and facilities are configured, operated and maintained in accordance with the relevant manufacturers specifications
- maintain the following data quality standards:
 - accuracy – all data must be sufficiently accurate for its intended purposes
 - validity – all data must be recorded and used in compliance with the company requirements
 - reliability – all data must be stable and, wherever possible, use consistent data collection processes across
 - timeliness – all must be captured as quickly as possible and available for use as required to comply with the relevant regulations and law
 - relevance – all data captured must be relevant to a specified purpose(s)

- completeness/integrity – all data processed must be regularly monitored for missing, incomplete or invalid records in order to indicate data quality.

Access

- The non-public areas of the Company premises are designated a secure area. Visitors are to be escorted at all times and a record of visits kept.
- In order to prevent unauthorised access during silent hours all offices are locked.

Equipment Security

- All hardware and software assets held by the Company are to be held against a hardware register.
- No alteration to the hardware configuration of the system may take place without the permission of CFO. Under no circumstances are modems to be attached to any part of the system.
- Only approved systems engineers will be allowed access to hardware or software and such access are recorded.
- Computer hard discs are not to be removed from the Company premises without the written permission of CFO.
- The disposal of any storage media is subject to specific security control

Internal Security Control

Principle

All information shall have an official owner who will be fully accountable for its protection and who will be responsible for:

- Assigning a security classification where appropriate.
- Defining who is authorised to access the information on a need-to-know basis.
- Assessing the risks to the security of the information and the impact of its loss, for both short and long periods.
- Employing suitable measures to reduce risks.
- Ensuring that equipment is only utilised for Company business.
- Ensuring that information is authentic, correct, complete and auditable.
- Ensuring that information is backed up regularly and at a frequency commensurate with its usage and is validated in line with the recommendations laid out in the Application for 'Paperless' status.
- Safeguarding and retaining all Company records.
- Ensuring that information exchange with external organisations within or without the Company does not compromise the confidentiality of sensitive information, nor does it increase the risk of data corruption.

Security Incidents and Reporting

A security incident is defined as any event that could result or has resulted in:

- The disclosure of confidential information to any unauthorised individual.
- The integrity of the system or data being put at risk.
- The availability of the system or information being put at risk.
- An adverse impact, for example:
 - Embarrassment to the Company, Clients and staff.
 - Threat to personal safety or privacy.
 - Legal obligation or penalty.
 - Financial loss.
 - Disruption of activities.
- All incidents or information indicating a suspected or actual breach of security must be reported immediately to the Security Coordinator.
- The types of incidents that can result in a breach of security are many and varied. Their severity will depend upon a myriad of factors but the majority will be innocent and unintentional and will not normally result in any form of disciplinary action. The likely result will be improved security and awareness throughout the practice.
- Any unusual incident must be reported to the Security Coordinator who will maintain a record of incidents.
- Any member of staff reporting a breach of security will have unhindered access to the Security Coordinator.

If that member believes the breach is as a result of an action or negligence on the part of any member of Company staff then the member will have access direct to the Security Coordinator.

Virus Protection

- A computer virus is a computer program, which 'infects' (modifies or attaches itself to) other computer programs. It then replicates itself and when a set of conditions arises it performs its intended function. This can range from a silly message to the destruction of the complete data holding of a system.
- A constantly running anti-virus software package has been provided and, where possible, set to auto-update the latest virus signatures. This does not absolve users from specifically checking any externally sourced disc for viruses before downloading any data or application.

Passwords

Passwords are an effective security measure only if they are properly constructed and kept secret. Directors and staff will follow the following routines for password management.

System administrators or the IT Team is responsible for configuring a minimum password length and protection. Every password must be at least 8 characters long and must be a combination of alphabetic, numeric, upper and lower case and system characters.

All passwords are changed immediately upon issuance for the first-use. All systems (such as network devices) have their default credentials changed on the first installation or first log-on/ provision. Initial passwords must be securely transmitted to the individual. Passwords must never be shared with another individual for any reason or in any manner not consistent with this policy.

In order to limit attempts at guessing passwords or compromising accounts, an account lockout should come into place after 5 incorrect logins within a 30-minute window.

All passwords will be changed every 60 days through system forced password changes. Additionally, employees will have to change their password at any time if they feel their password has been compromised (which should also be reported to HR). Repeated use of previously used passwords is disabled.

All users must have an individual user name for logon.

- Passwords should be given values that are not associated with personal characteristics, (e.g. children's names, telephone numbers, car registration numbers etc.) Simple and obvious strings of characters and numbers should not be used and passwords must be a combination of alphabetic, numeric, upper and lower case and system characters.
- Passwords must not be written down and are not to be revealed to or shared with other users.
- Individuals must never leave themselves logged into an application or system where someone else can unknowingly use their account.
- Individual passwords should be different for each application used.

System Controls

No terminal, laptop, desktop, tablet or mobile device or any other endpoint device or asset is to be left logged on and unattended. Users leaving their workstation are to log off the system, or change user, to prevent unauthorised access.

Clear Desk and Clear Screen Policy should be read in conjunction with this policy.

Housekeeping

- Data back up of the complete system will be completed daily by IP Integration. All backup data will be accorded the same level of security as live data and held separately at an off-site secure location.
- All software in use by the Company must be licensed and networked applications may be subject to a limited number of users. The Security Coordinator is to ensure that software is correctly used against licences held.
- By default, Interr allows users to connect to cloud services from any authorised computer or device IP address, as long as they have the relevant login detail and access rights.
- Software is not to be loaded onto any system or PC without the express authority of the Security Coordinator. This Policy is also to be reflected in employee's terms and conditions of employment.

Assets protection and reporting

It is the responsibility of all staff to take reasonable measures in protecting Interr's property, as well as their own personal property, from theft, loss or damage.

All computer equipment must be located in suitable physical locations that:

- Reduce risks from environmental hazards, for example, heat, fire, smoke, water, dust and vibration;
- Reduce the risk of theft, for example, if necessary items such as laptops should be physically attached to the desk;
- Facilitate workstations handling sensitive data being positioned so as to eliminate the risk of the data being seen by unauthorised people.

Cables that carry data or support key information services must be protected from interception or damage. Power cables should be separated from network cables to prevent interference. Network cables should, as far as reasonably possible, be protected by conduit and where possible avoid routes through public areas.

The company will establish contact with all relevant authorities and All breaches will be investigated, reported to the relevant authorities and relevant evidence preserved and submitted where required. Any employee found to have violated this policy may be subjected to disciplinary action in line with Interr's disciplinary procedures and may result in a gross misconduct offence which may result in dismissal without notice.

The employee's responsible for taking good care of the computer and any other devices, assets or endpoint devices used for work and taking all reasonable precautions to ensure that the devices are not compromised, damaged, lost or stolen. In the event that the device or asset is stolen, lost or damaged, you must also immediately inform your line manager and HR.

Clear Desk and Clear Screen Policy should be read in conjunction with this policy.

Service Continuity Planning

Disaster Recovery and Service Continuity Contingency plans are produced to ensure the continued fulfilment of the Company mission.

External Security Controls

General

Any person not directly a member of the Company is to be considered 'external'.

Information Exchange

The exchange of information with, and between, other organisations shall take place within formal arrangements that reflect the legal requirements and the sensitivity of the information.

Staff Compliance

All employed and attached staff must abide by the requirements laid down in this Policy and failure to comply with the Policy may be a disciplinary matter with a potential dismissal and could also result in a breach of the law and/ or a criminal offence.

Policy Review

This policy may be amended by Interr at any time to take into account taking into account changing circumstances, legislation, technology and security risks. This policy was last reviewed and agreed by the Board and seeks to be reviewed and updated annually. Any queries arising regarding this policy should be addressed to Mick Tabori.



Mick Tabori – CEO
January 2024