

THE ORIGINAL DATA COMPANY LIMITED

INFORMATION SECURITY MANAGEMENT SYSTEM

SECURITY & INFORMATION SECURITY POLICY

Version 1: 11 October 2023

Introduction

The Original Data Company Limited Information Security Policy applies to all business functions within the scope of the Information Security Management System and covers the information, information systems, networks, physical environment and people supporting these business functions. This document states the Information Security objectives and summarises the main points of the Information Security Policy to meet the requirements of ISO 27001:2022.

Objective

The objective of Information Security is to ensure business continuity and minimise business damage by preventing and minimising the impact of security incidents.

SMART objectives

1. To achieve 0 incidents of unauthorised disclosure over a 12-month period
2. To achieve 0 breaches of system over a 12-month period
3. To achieve 0 unauthorised or accidental modification of data over a 12 month period
4. All SAR's responded to within 28 days of receipt over a 12-month period

Responsibilities

1. The Managing Director has approved the Information Security Policy.
2. Overall responsibility for Information Security rests with the Managing Director.
3. Day-to-day responsibility for procedural matters, legal compliance including data protection, maintenance and updating of documentation, promotion of security awareness, liaison with external organisations, incident investigation, management reporting etc. rests with the ISMS Manager.
4. Day-to-day responsibility for technical matters, including technical documentation, systems monitoring, technical incident investigation and liaison with technical contacts at external organisations, rests with the ISMS Manager.
5. All employees or agents acting on the Organisation's behalf have a duty to safeguard assets, including locations, hardware, software, systems or information, in their care and to report any suspected breach in security without delay, direct to the ISMS Manager. Employees attending sites that are not occupied by the Organisation must ensure the security of the Organisation's data and access their systems by taking particular care of laptop and similar computers and of any information on paper or other media that they have in their possession.
6. The ISMS Manager is responsible for drafting, maintaining and implementing this Security Policy and similarly related documents as detailed in Appendix II.
7. As with other considerations including Quality and Health & Safety, Information Security aspects are taken into account in all daily activities, processes, plans, projects, contracts and partnerships entered into by the Organisation.
8. The Organisation's employees are advised and trained on general and specific aspects of Information Security, according to the requirements of their function within the Organisation. The Contract of Employment includes a condition covering confidentiality regarding the Organisation's business.

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9. Adherence to Information Security procedures as set out in the Organisation's various policies and guideline documents is the contractual duty of all employees and a clause to this effect is set out in the Organisation's Contracts of Employment.
10. Copies of this Manual, including the Risk Assessment (Annex A Statement of Applicability) are made available to all of the Organisation's employees.
11. Breach of the Information Security policies and procedures by the Organisation's employees may result in disciplinary action, including dismissal.
12. In view of the Organisation's position as a trusted provider of secure data storage and compliance control systems, particular care is taken in all procedures and by all employees to safeguard the Information Security of its service users and/or clients.
13. Agreements of Mutual Non-disclosure/Confidentiality are entered into as appropriate with third party Companies.
14. All statutory and regulatory requirements are met and regularly monitored for changes.
15. A Disaster Recovery/Business Continuity Plan is in place. This is maintained, tested and subjected to regular review by the ISMS Manager.
16. Further policies and procedures such as those for access, acceptable use of e-mail and the Internet, virus protection, backups, passwords, systems monitoring etc. are in place, maintained and are regularly reviewed by the ISMS Committee or an appointed representative, as appropriate.
17. This Information Security Policy is regularly reviewed and may be amended by the ISMS Committee in order to ensure its continuing viability, applicability and legal compliance, and with a view to achieving continual improvement in the Information Security Systems.

Ver.	Name	Position	Signature	Date
2023 1.0	Paul Golding	Managing Director The Original Data Company Limited		1/9/2023

Date of Next Review: 1/3/2024