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1. Introduction

This document sets out the policy to be followed by all employees of <<insert Company name>> (the “Company”) in order to protect the Company’s data, information, services, infrastructure, computing environment and any and all IT Systems from damage and threats whether deliberate, or accidental.

2. Key Principles

- 2.1 All IT Systems are to be protected against unauthorised access.
- 2.2 All IT Systems are to be used in compliance with relevant Company Policies.
- 2.3 All employees of the Company who use the IT Systems including contractors and sub-contractors (collectively, “Users”) must adhere to and comply with this Policy and any other relevant policies.
- 2.4 All line managers must ensure that all Users under their control and direction must adhere to and comply with this Policy at all times as required under paragraph 2.3.
- 2.5 All data stored on IT Systems must be managed securely in compliance with all relevant parts of the Data Protection Legislation. “Data Protection Legislation” means all data protection and privacy laws including, but not limited to, the Data Protection Regulation ((EU) 2016/679) in England and Wales, the Data Protection Act 2018 in Ireland by virtue of section 3 of the Data Protection Act 2018, the Data Protection Regulations 2003 as amended, and any successor legislation.
- 2.6 All data stored on IT Systems must be classified appropriately (including, but not limited to, personal data, and confidential information) [with reference to the classification system/procedure etc. if appropriate>>]. All data must be handled appropriately in accordance with its classification.
- 2.7 All data stored on IT Systems must be available only to those Users with a legitimate need for access to the data.
- 2.8 All data stored on IT Systems must be protected against unauthorised access.
- 2.9 All data stored on IT Systems must be protected against loss and/or corruption.
- 2.10 All IT Systems are to be maintained, serviced, repaired, and upgraded by <<insert Company name>> (the “IT Department”) or by such third party as the IT Department may from time to time authorise.

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2.11 The responsibility for the security of all IT Systems and the data stored thereon (including, but not limited to, the security, integrity, and confidentiality of that data) shall rest with the IT Department unless expressly stated otherwise.

2.12 All breaches of security of IT Systems or any data stored thereon shall be promptly investigated by the IT Department. [Any breach known or suspected to involve personal data shall be reported to the Data Protection Officer, <<insert name and contact details>>]

2.13 All Users must report any concerns relating to the IT Systems or the data stored thereon to the IT Department. [If any such concerns relate in any way to personal data, such concerns must [also] **OR** [instead] be reported to the Data Protection Officer.]

3. IT Department Responsibilities

3.1 The IT Manager, <<insert name and contact details>>, shall be responsible for the following:

- a) ensuring that the IT Department is assessed and deemed suitable for compliance with the Data Protection Act 1998 requirements;
- b) ensuring that the IT Department within the Company are effectively implemented and working in consultation with the Data Protection Officer, as appropriate,] and that the outcome of such reviews to the Company's security policy are of the requirements of this Policy and of the relevant regulations, and other relevant rules whether or not in force including, but not limited to, the Computer Misuse Act 1990.
- c) ensuring that the IT Department are aware of the requirements of this Policy and of the relevant regulations, and other relevant rules whether or not in force including, but not limited to, the Computer Misuse Act 1990.

3.2 The IT Staff shall be responsible for the following:

- a) assisting all Users in understanding and complying with this Policy;
- b) providing all Users with support and training in IT security matters and understanding;
- c) ensuring that the levels of access to IT Systems that are appropriate to the job role, taking into account their job role, responsibilities and security requirements;
- d) receiving and responding to reports relating to IT security matters and taking appropriate action [including, in the event that any reports are received by the Data Protection Officer];
- e) taking proactive measures to establish and implement IT security awareness;
- f) assisting the IT Manager in bringing all IT security within the Company and ensuring that the Company is able to implement this Policy and any changes to it in the future; and
- g) ensuring that the security of all data stored within the IT Systems at intervals of <<insert interval>> and that such backups are stored in a secure location [onsite] **AND/OR** [offsite]. All backups should be encrypted using <<insert type(s) of encryption>>].

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4. Users' Responsibilities

- 4.1 All Users must comply with the provisions of this Policy at all times when using the IT Systems.
- 4.2 All Users must use the IT Systems within the bounds of UK law and must not use the IT Systems for any activity which is likely to contravene any UK law whether or not it is a criminal offence.
- 4.3 Users must immediately report any concerns [(and, where such concerns relate to personal data, the Data Protection Officer)] of any and all security concerns relating to the IT Systems.
- 4.4 Users must immediately report any problems (including, but not limited to, hardware failures and software errors) to the IT Department of any other technical support.
- 4.5 Any and all deliberate breaches of this Policy by Users will be handled as appropriate under disciplinary procedures.

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5. Software Security Measures

- 5.1 All software in use on IT Systems, including, but not limited to, operating systems, individual software applications and any and all intermediate releases, will be kept up-to-date with the latest updates, patches, fixes, and other security updates at the sole discretion of the IT Department. This includes 'major releases' (e.g. Windows 2.0), only to updates within a major release (e.g. from version 1.0.0 to version 1.0.1 etc.). Unless a security update is classified as a major release, falling within the scope of this provision, it will be classed as a minor release and outside the scope of this provision.
- 5.2 Where any security flaw is identified in software that will be either fixed immediately or withdrawn from the IT Systems until the flaw is remedied. [If the security flaw affects any personal data, the Data Protection Officer should be notified immediately.]
- 5.3 No Users may install software on IT Systems supplied on physical media without the approval of the IT Manager. All software must be approved by the IT Manager and may be installed on IT Systems that installation poses no security risk to the IT Systems and would not breach any licence agreements to which the IT Systems are subject.
- 5.4 All software will be installed on IT Systems by the IT Department unless an individual User is authorised to do so by the IT Manager. Such written permission must specify which software may be installed and onto which computer it may be installed.

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6. Anti-Virus Security Measures

- 6.1 Most IT Systems (including servers) will be protected with suitable anti-virus, firewalls and internet security software. All IT Systems will be kept up-to-date with the latest software updates and definitions.

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| <p>7.1 Wherever practical, all IT Systems shall be securely locked when not in use or not (with an exception) in use (with an exception) smart card, door code, or other means. Users must not allow access to such locations for any reason.</p> | <p>[REDACTED]</p> | <p>located in rooms which may be accessed in appropriate cases, at all times whether or not the room is locked. Access to such locations is restricted, and access to such locations for any reason shall be restricted.</p> |
| <p>7.2 All IT Systems not in use shall be locked, to, servers, network infrastructure, etc. located, wherever possible, in locked and/or in locked climate-controlled rooms and/or in locked climate-controlled rooms accessed only by designated members of the IT Department.</p> | <p>[REDACTED]</p> | <p>by Users (including, but not limited to, those listed above) shall be restricted. Access to such locations is restricted, and access to such locations for any reason shall be restricted.</p> |
| <p>7.3 No Users shall have access to IT Systems (including servers, network infrastructure, etc.) without the express permission of the IT Manager. In the event of a problem with such IT System, whenever a problem with such IT System is reported to the IT Department, the IT Manager shall attempt to rectify any such problem. In the event of a problem with such IT System, whenever a problem with such IT System is reported to the IT Department, the IT Manager shall attempt to rectify any such problem.</p> | <p>[REDACTED]</p> | <p>is not intended for normal use by Users (including, but not limited to, those listed above) without the express permission of the IT Manager. In the event of a problem with such IT System, whenever a problem with such IT System is reported to the IT Department, the IT Manager shall attempt to rectify any such problem.</p> |
| <p>7.4 All non-mobile devices shall be limited to, desktop computers, etc.</p> | <p>[REDACTED]</p> | <p>limited to, desktop computers, etc.</p> |

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workstations, and be physically secured in the design of the hardware to prevent tampering with or the

7.5 All mobile devices (laptops, smartphones) provided to Users should be transported securely and handled in a manner where such mobile devices are to be left unattended inside a lockable case or other suitable container. Users should make reasonable efforts to avoid such devices being left at any location [other than their private homes or Companies] where such mobile device is to be left in a vehicle it must be in a locked compartment.

7.6 The IT Department shall maintain an asset register of all IT Systems. All IT Systems shall be recorded in the asset register.

8. Access Security

8.1 Access privileges for Users shall be determined on the basis of Users' levels of authority within the Company and the requirements of their job roles. Users shall not be granted access to IT Systems or electronic data which are not reasonably required for the performance of their job roles.

8.2 All IT Systems (and devices including, but not limited to, laptops, tablets, and smartphones) shall be protected with a secure password or passcode, or such other security measure as the IT Department may deem appropriate. All forms of biometric log-in are considered secure. Only those log-in methods approved by the IT Department may be used.

8.3 All passwords must, when used on a computer, or device allows:

- a) be at least << minimum length>> characters long;
- b) contain a combination of upper case letters / numbers / lower case letters / numbers / spaces / symbols;
- c) be changed at an interval << minimum interval>> days;
- d) be different from previous passwords;
- e) not be obvious (e.g. birthdays or other memorable dates, memorable words, places etc.); and
- f) be created by the User.

8.4 Passwords should be kept confidential. Under no circumstances should a User share their password with anyone, including the IT Manager and the IT Staff. No User should be asked for their password by anyone at any time. If a User is asked for their password they should be refused. If a User has obtained their password, they should not use it. If a User suspects a breach of security, they should report the suspected breach to the IT Department immediately and report the suspected breach to the IT Department. If personal data could be accessed by an unauthorised individual, the IT Manager should be notified immediately.

8.5 If a User forgets their password, they should report the suspected breach to the IT Department immediately. The IT Department will then take the necessary steps to restore the User's access to the IT Systems and issue a temporary password.

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8.6 Users should not write
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to a computer display

8.7 All IT Systems with
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disrupt any other
processing).

8.8 All mobile devices
(smartphones) provid
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other form of log-in
period.

8.9 Users may not use
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software must be rea
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8.10 [Users may connect
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devices shall be sub
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9. Data Storage Security

9.1 All data, and in par
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9.2 All data stored elec
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9.3 No personal data sh
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the Company or oth
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and for no longer tha

9.4 No data, and in p

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must be set up by the User
the IT Systems.

is possible to remember them. If a
ould be stored securely (e.g. in a
ase) and under no circumstances
s to see (e.g. by attaching a note

devices (e.g. mouse, keyboard,
ere possible, with a password
after <<insert time period>> of
ed by Users and Users may not
screensaver will not interrupt or
on the computer (e.g. data

imited to, laptops, tablets, and
l be set to lock, sleep, or similar,
quiring a password, passcode, or
ar. Users may not alter this time

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eared by the IT Manager [and,
ccessible by the outside party, the

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requirements provided by the IT
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should be stored securely using
>>] data encryption.

edia, and in particular personal
ox, drawer, cabinet, or similar.

mobile device (including, but not
, whether such device belongs to
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approval, strictly in accordance
at the time the approval is given,
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should be transferred to any

computer or device p
is a contractor or su
User has agreed to
and the Data Protect

User unless the User in question
behalf of the Company and that
company's Data Protection Policy

10. Data Protection

10.1 All personal data (a
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Protection Legislation) collected,
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e Data Protection Legislation, the
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10.2 All Users handling d
and must comply with
at all times. In particu

the Company shall be subject to,
Company's Data Protection Policy
apply:

a) All emails cor
type(s) of enc

must be encrypted [using <<insert

b) All emails cor

must be marked "confidential";

c) Personal da
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d over secure networks only;
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d) Personal da
is a wired alte

over a wireless network if there
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e) Personal da
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y of an email, whether sent or
from the body of that email, and
ld be deleted. All temporary files
eleted [using <<insert method of

f) All personal
removable ele
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d physically, including that on
transferred in a suitable container

g) Where any co
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is to be left unattended for any
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10.3 Any questions relat
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should be referred to [the Data
t details>>].

11. Internet and Email Use

11.1 All Users shall be s
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Internet Policy when using the IT

11.2 Where provisions in
ensure IT security
requirements impos
Users must take suc

additional steps to be taken to
t or email over and above the
ons, Email and Internet Policy,

12. Reporting IT Security Breaches

- 12.1 Subject to paragraph 12.2, questions, suspected breaches, or known breaches shall be reported immediately to [<<insert specific name>>] OR [the IT Department] OR [a member of the IT Staff].
- 12.2 [All concerns, questions, or known breaches that involve personal data shall be reported to the Data Protection Officer who shall handle the matter in accordance with the Company's Data Protection Policy.]
- 12.3 Upon receiving a question or suspected breach, the IT Department shall, within <<insert period>>, including, but not limited to, the level of risk associated with the issue, take any and all such steps as the IT Department deems appropriate to resolve the issue.
- 12.4 Under no circumstances shall the IT Department attempt to resolve an IT security breach on their own. Only the Data Protection Officer, and the IT Department [(or the Data Protection Officer)] may only attempt to resolve IT security breaches under the express permission of, the IT Department.
- 12.5 All IT security breaches shall be fully documented by the IT Department or by a User under the IT Department.

13. Policy Review

The Company shall review this Policy <<insert interval>> and otherwise as required in order to ensure it is up-to-date and fit for purpose. All questions, concerns, and suggestions relating to this Policy should be communicated to the IT Manager and contact details>> [and/or the Data Protection Officer, <<insert details>>].

14. Implementation of Policy

This Policy shall be deemed to have retroactive effect from the start date>>. No part of this Policy shall have retroactive effect to matters occurring on or after this date.

This Policy has been approved by:

Name: <<insert full name>>

Position: <<insert position>>

Date: <<insert date>>

Due for Review by: <<insert date>>

Signature: