

VERDE SERVICES LIMITED

IT SECURITY POLICY – APRIL 2024

INTRODUCTION

Verde Services is effectively discharging its statutory duties by preparing a written IT security policy. A copy of the policy, which outlines Verde Services IT security arrangements and organisational structure is provided at Verde Services premises and is available for all employees or other interested parties to read.

This IT security policy helps us:

- Reduce the risk of IT problems.
- Plan for problems and deal with them when they happen.
- Keep working if something does go wrong.
- Protect company, client and employee data.
- Keep valuable company information, such as plans and designs, secret.
- Meet our legal obligations under the general data protection regulation and other laws.
- Meet our professional obligations towards our clients and customers.

Responsibilities

The person with overall and final responsibility for IT security in Verde Services is Luke Dwyer, director. The person responsible for overseeing, implementing, and monitoring the policy is Gary Dwyer director.

Review process

The company directors will review this policy once every 6 months. In the meantime, if you have any questions, suggestions or feedback, please contact your director who will escalate accordingly.

Information classification

We will only classify information which is necessary for the completion of our duties. We will also limit access to personal data to only those that need it for processing. We classify information into different categories so that we can ensure that it is protected properly and that we allocate security resources appropriately:

- **Unclassified.** This is information that can be made public without any implications for the company, such as information that is already in the public domain.
- **Employee confidential.** This includes information such as medical records and pay.
- **Company confidential.** Such as contracts, source code, business plans, passwords for critical IT systems, client contact records, accounts etc.



Verde Services Ltd

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- Client confidential. This includes personally identifiable information such as name or address, passwords to client systems, client business plans, new product information, market sensitive information etc.

The deliberate or accidental disclosure of any confidential information has the potential to harm the business. This policy is designed to minimise that risk.

Access controls

Internally, as far as possible, we operate on a 'need to share' rather than a 'need to know' basis with respect to company confidential information. This means that our bias and intention is to share information to help people do their jobs rather than raise barriers to access needlessly.

As for client information, we operate in compliance with the GDPR 'Right to Access'. This is the right of data subjects to obtain confirmation as to whether we are processing their data, where we are processing it and for what purpose. Further, we shall provide, upon request, a copy of their personal data, free of charge in an electronic format.

We also allow data subjects to transmit their own personal data to another controller.

In addition, admin privileges to company systems will be restricted to specific, authorised individuals for the proper performance of their duties.

Security software

To protect our data, systems, users and customers we use the following systems:

- Laptop and desktop anti-malware.
- Cloud-hosted email spam, malware and content filtering.
- Email archiving and continuity.
- Website malware and vulnerability scanning.
- Intrusion detection and prevention.
- Desktop firewall.
- Perimeter firewall.

Employees joining and leaving

When a new employee joins the company, we will add them to systems as required for the performance of their job role. We will provide training to new staff and support for existing staff to implement this policy. This includes:

- An initial introduction to IT security, covering the risks, basic security measures, company policies and where to get help.
- Training on how to use company systems and security software properly.
- On request, a security health check on their computer, tablet or phone.



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When people leave a project or leave the company, we will promptly revoke their access privileges to company systems.

Employee responsibilities

Effective security is a team effort requiring the participation and support of every employee and associate. It is your responsibility to know and follow these guidelines.

All employees are personally responsible for the secure handling of confidential information that is entrusted to them. The employee may access, use or share confidential information only to the extent it is authorised and necessary for the proper performance of your duties. All employees must promptly report any theft, loss or unauthorised disclosure of protected information or any breach of this policy to a director.

Employees - Protecting your own device(s)

It is all employees' responsibility to use their devices (computer, phone, tablet etc.) in a secure way. However, Verde Services will provide training and support to enable employees to do so. At a minimum an employee must:

- Remove software that they do not use or need from the computer.
- Update operating system and applications regularly.
- Keep the computer firewall switched on.
- For windows users, make sure you install anti-malware software (or use the built-in windows defender) and keep it up to date.
- Store files in official company storage locations so that it is backed up properly and available in an emergency.
- Switch on whole disk encryption.
- Understand the privacy and security settings on your phone and social media accounts.
- Have separate user accounts for other people, including other family members, if they use your computer. Ideally, keep your work computer separate from any family or shared computers.
- Don't use an administrator account on your computer for everyday use.
- Make sure your computer and phone logs out automatically after 15 minutes and requires a password to log back in.

Password guidelines

- Change default passwords and PINs on computers, phones and all network devices.
- Consider using password management software.
- Don't share your password with other people or disclose it to anyone else.
- Don't write down PINs and passwords next to computers and phones.
- Use strong passwords.
- Change them regularly.
- Don't use the same password for multiple critical systems.



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Be alert to other security risks

While technology can prevent many security incidents, employees' actions and habits are also important. With this in mind all employees should:

- Take time to learn about IT security and keep yourself informed. Get Safe Online is a good source for general awareness.
- Use extreme caution when opening email attachments from unknown senders or unexpected attachments from any sender.
- Be on guard against social engineering, such as attempts by outsiders to persuade you to disclose confidential information, including employee, client or company confidential information. Fraudsters and hackers can be extremely persuasive and manipulative.
- Be wary of fake websites and phishing emails. Don't click on links in emails or social media. Don't disclose passwords and other confidential information unless you are sure you are on a legitimate website.
- Use social media, including personal blogs, in a professional and responsible way, without violating company policies or disclosing confidential information.
- Take particular care of your computer and mobile devices when you are away from home or out of the office.
- If you leave the company, you will return any company property, transfer any company work-related files back to the company and delete all confidential information from your systems as soon as is practicable.
- Where confidential information is stored on paper, it should be kept in a secure place where unauthorised people cannot see it and shredded when no longer required.

The following things (among others) are, in general, prohibited on company systems and while carrying out your duties for the company and may result in disciplinary action:

- Anything that contradicts our equality and diversity policy, including harassment.
- Circumventing user authentication or security of any system, network or account.
- Downloading or installing pirated software.
- Disclosure of confidential information at any time.

Backup, disaster recovery and continuity

Our systems are backed up automatically overnight every night, and so any cyber-attack should only affect a maximum of 1 days' data. Our outsourced IT Services provider will ensure backups are available for reinstatement at any time should company systems become corrupted or infected.

We will test these contingency plans at least once a year.

This is how we will respond to IT security issues:

- Malware infection detected by scanners.
- Ransomware.



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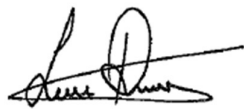


- System failure.
- Attempted social engineering.
- Data loss or theft.

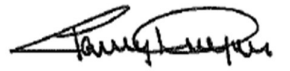
Under the GDPR, where a data breach is likely to result in a 'risk for the rights and freedoms of individuals' we must notify the customers and data controllers 'without undue delay'. We will ensure we inform them within 72 hours.

DIRECTORS APPROVAL

This statement has been approved by the Directors who will review and ensure it is updated annually.



Luke Dwyer



Gary Dwyer

