

Hatch Apps Ltd. t/a Xavier Analytics

Information Security Policy

Last Reviewed May 2019

1. Introduction

This document sets out the measures to be taken by all employees of Xavier Analytics (the “Company”) and by the Company as a whole in order to protect the Company’s computer systems, devices, infrastructure, computing environment and any and all other relevant equipment (collectively, “IT Systems”) from damage and threats whether internal, external, 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 only in compliance with relevant Company Policies.
- 2.3 All employees of the Company and any and all third parties authorised to use the IT Systems including, but not limited to, contractors and sub-contractors (collectively, “Users”), must ensure that they are familiar with this Policy and must adhere to and comply with it at all times.
- 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 are to be managed securely in compliance with all relevant parts of EU Regulation 2016/679 General Data Protection Regulation (“GDPR”) and all other laws governing data protection whether now or in the future in force.
- 2.6 All data stored on IT Systems are to be classified appropriately (including, but not limited to, personal data, sensitive personal data, and confidential information). All data so classified must be handled appropriately in accordance with its classification. Our information management policy classifications breaks information to the following four categories as follows:
 - a. Unclassified Public - Information is not confidential and can be made public without any implications for Company. Loss of availability due to system downtime is not an acceptable risk. Integrity is important but not vital.
 - b. Proprietary - Information is restricted to management approved internal access and protected from external access. Unauthorized access could influence Company's operational effectiveness, cause an

important financial loss, provide a significant gain to a competitor, or cause a major drop in customer confidence. Information integrity is vital.

- c. Client Confidential Data - Information received from clients in any form for processing in production by the Company. This includes personally identifiable data given by consent regarding our clients. The original copy of such information must not be changed in any way without written permission from the client. The highest possible levels of integrity, confidentiality, and restricted availability are vital.
 - d. Company Confidential Data - Information collected and used by the Company in the conduct of its business to employ people, to log and fulfill client orders, and to manage all aspects of corporate finance. This includes personally identifiable data regarding our employees. Access to this information is very restricted within the company. The highest possible levels of integrity, confidentiality, and restricted availability are vital.
- 2.7 All data stored on IT Systems shall be available only to those Users with a legitimate need for access.
 - 2.8 All data stored on IT Systems shall be protected against unauthorised access and/or processing.
 - 2.9 All data stored on IT Systems shall be protected against loss and/or corruption.
 - 2.10 All IT Systems are to be installed, maintained, serviced, repaired, and upgraded by James Hulse (the "IT Department") or by such third party/parties as the IT Department may from time to time authorise.
 - 2.11 The responsibility for the security and integrity of all IT Systems and the data stored thereon (including, but not limited to, the security, integrity, and confidentiality of that data) lies with the IT Department unless expressly stated otherwise.
 - 2.12 All breaches of security pertaining to the IT Systems or any data stored thereon shall be reported and subsequently investigated by the IT Department. Any breach which is either known or suspected to involve personal data shall be reported to the Data Protection Officer, Helen Lloyd, at helen@xavier-analytics.com.
 - 2.13 All Users must report any and all security concerns relating to the IT Systems or to the data stored thereon immediately to the IT Department. If any such concerns relate in any way to personal data, such concerns must also be reported to the Data Protection Officer.

3. IT Department Responsibilities

- 3.1 The IT Manager, James Hulse (james@xavier-analytics.com), shall be responsible for the following:

- a) ensuring that all IT Systems and devices with access to company data are assessed and deemed suitable for compliance with the Company's security requirements;
- b) ensuring that IT security standards within the Company are effectively implemented and regularly reviewed, working in consultation with the Company's senior management and Data Protection Officer, as appropriate, and reporting the outcome of such reviews to the Company's senior management;
- c) ensuring that all Users are kept aware of the requirements of this Policy and of all related legislation, regulations, and other relevant rules whether now or in the future in force including, but not limited to, the GDPR and 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 appropriate support and training in IT security matters and use of IT Systems;
- c) ensuring that all Users are granted levels of access to IT Systems that are appropriate for each User, taking into account their job role, responsibilities, and any special security requirements;
- d) receiving and handling all reports relating to IT security matters and taking appropriate action in response including, in the event that any reports relate to personal data, informing the Data Protection Officer;
- e) taking proactive action, where possible, to establish and implement IT security procedures and raise User awareness;
- f) assisting the IT Manager in monitoring all IT security within the Company and taking all necessary action to implement this Policy and any changes made to this Policy in the future; and
- g) ensuring that regular backups are taken of all data stored within the IT Systems at intervals no less than daily and that such backups are stored at a suitable location offsite. All backups should be encrypted.

4. Users' Responsibilities

- 4.1 All Users must comply with all relevant parts of this Policy at all times when using the IT Systems.
- 4.2 All Users must use the IT Systems only within the bounds of UK law and must not use the IT Systems for any purpose or activity which is likely to contravene any UK law whether now or in the future in force.
- 4.3 Users must immediately inform the IT Department (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 inform the IT Department of any other technical problems (including, but not limited to, hardware failures and software errors) which may occur on the IT Systems.
- 4.5 Any and all deliberate or negligent breaches of this Policy by Users will be

handled as appropriate under the Company's disciplinary procedures.

5. Software Security Measures

- 5.1 All software in use on the IT Systems (including, but not limited to, operating systems, individual software applications, and firmware) will be kept up-to-date and any and all relevant software updates, patches, fixes, and other intermediate releases will be applied at the sole discretion of the IT Department. This provision does not extend to upgrading software to new 'major releases' (e.g. from version 1.0 to version 2.0), only to updates within a particular major release (e.g. from version 1.0 to version 1.0.1 etc.). Unless a software update is available free of charge it will be classed as a major release, falling within the remit of new software procurement and outside the scope of this provision.
- 5.2 Where any security flaw is identified in any software that flaw will be either fixed immediately or the software may be withdrawn from the IT Systems until such time as the security flaw can be effectively remedied. If the security flaw affects, is likely to affect, or is suspected to affect any personal data, the Data Protection Officer shall be informed immediately.
- 5.3 In accordance with our Bring Your Own Device ('BYOD') Policy, devices must be presented to the IT Department for proper job provisioning and configuration, such as operating systems, browsers, productivity software, development and security tools, before they can access any company data.
- 5.4 Employees are not allowed to download, install and use any app from outside approved app stores (eg. Apple App Store), without the approval of the IT Manager. Any software must be approved by the IT Manager and may only be installed where that installation poses no security risk to the IT Systems and where the installation would not breach any licence agreements to which that software may be subject.

6. Anti-Virus Security Measures

- 6.1 Most IT Systems (including all computers and servers) will be protected with suitable anti-virus, firewall, and other suitable internet security software. All such software will be kept up-to-date with the latest software updates and definitions.
- 6.2 All IT Systems protected by anti-virus software will be subject to a full system scan daily.
- 6.3 No physical media (e.g. USB memory sticks or disks of any kind) will be used by Users for transferring files without prior approval from the IT Department, and in the event that it cannot be avoided, all physical media must be virus-scanned before any files may be transferred.
- 6.4 Users shall be permitted to transfer files using cloud storage systems only with the approval of the IT Manager who will provide suitable cloud storage account access. All files downloaded from any cloud storage system must be scanned for viruses during the download process.
- 6.5 Any files being sent to third parties outside the Company must be scanned for viruses before being sent or automatically as part of the sending process, as

appropriate.

- 6.6 Where any virus is detected by a User this must be reported immediately to the IT Department (this rule shall apply even where the anti-virus software automatically fixes the problem). The IT Department shall promptly take any and all necessary action to remedy the problem. In limited circumstances this may involve the temporary removal of the affected computer or device. Wherever possible a suitable replacement computer or device will be provided to limit disruption to the User.
- 6.7 If any virus or other malware affects, is likely to affect, or is suspected to affect any personal data, in addition to the above, the issue must be reported immediately to the Data Protection Officer.
- 6.8 Where any User deliberately introduces any malicious software or virus to the IT Systems this will constitute a criminal offence under the Computer Misuse Act 1990 and will be handled as appropriate under the Company's disciplinary procedures.

7. Hardware Security Measures

- 7.1 All IT Systems not intended for normal use by Users (including, but not limited to, servers, networking equipment, and network infrastructure) shall be located, wherever possible and practical, in secured, climate-controlled rooms and/or in locked cabinets which may be accessed only by designated members of the IT Department. This level of security will be required from all third-party cloud service providers at minimum.
- 7.2 No Users shall have access to any IT Systems not intended for normal use by Users (including such devices mentioned above) without the express permission of the IT Manager who will provide the relevant account access. Under normal circumstances, whenever a problem with such IT Systems is identified by a User, that problem must be reported to the IT Department. Under no circumstances should a User attempt to rectify any such problems without the express permission (and, in most cases, instruction and/or supervision) of the IT Manager.
- 7.3 As per the BYOD policy, all non-mobile devices (including, but not limited to, desktop computers, workstations, and monitors) shall, wherever possible and practical, be physically secured in place with a suitable locking mechanism. Where the design of the hardware allows, computer cases shall be locked to prevent tampering with or theft of internal components.
- 7.4 As per the BYOD policy, all mobile devices (including, but not limited to, laptops, tablets, and smartphones) provided by the Company should always be transported securely and handled with care. In circumstances where such mobile devices are to be left unattended, it is the responsibility of the employee to ensure the security of these devices. Users should make all reasonable efforts to avoid such mobile devices from being left unattended at any location other than their private homes or Company premises. If any such mobile device is to be left in a vehicle it must be stored out of sight and, where possible, in a locked compartment.
- 7.5 The IT Department shall maintain a complete asset register of all IT Systems

and the corresponding data shall be kept on the asset register.

8. Access Security

- 8.1 Access privileges for all IT Systems 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 any IT Systems or electronic data which are not reasonably required for the fulfilment of their job roles.
- 8.2 All IT Systems (and in particular mobile devices including, but not limited to, laptops, tablets, and smartphones) shall be protected with a secure password.
- 8.3 All passwords must, where the software, computer, or device allows:
 - a) be at least 6 characters long;
 - b) contain a combination of upper and lower case letters / numbers / spaces / symbols etc.;
 - c) not be reused from another account or previous password;
 - d) not be obvious or easily guessed (e.g. birthdays or other memorable dates, memorable names, events, or places etc.); and
 - e) be created by individual Users or by a password manager such as 1Password.
- 8.4 Passwords should be kept secret by each User. Under no circumstances should a User share their password with anyone, including the IT Manager and the IT Staff. No User will be legitimately asked for their password by anyone at any time and any such request should be refused. If a User has reason to believe that another individual has obtained their password, they should change their password immediately and report the suspected breach of security to the IT Department and, where personal data could be accessed by an unauthorised individual, the Data Protection Officer.
- 8.5 If a User forgets their password, this should be reported to the IT Department. If required, the IT Department will take the necessary steps to restore the User's access to the IT Systems which may include the issuing of a temporary password which may be fully or partially known to the member of the IT Staff responsible for resolving the issue. A new password must be set up by the User immediately upon the restoration of access to the IT Systems.
- 8.6 Users should not write down passwords if it is possible to remember them. If a User cannot remember a password, it should be stored securely (e.g. in a locked drawer or in a secure password database) and under no circumstances should passwords be left on display for others to see (e.g. by attaching a note to a computer display).
- 8.7 Users are strongly encouraged to use password managers, such as 1Password, to meet these requirements.
- 8.8 Users should always use 2-factor authentication, where available.
- 8.9 All IT Systems with displays shall be protected, where possible, with a password protected screensaver that will activate after 5 minutes of inactivity. Activation of the screensaver will not interrupt or disrupt any other activities

taking place on the computer (e.g. data processing).

- 8.10 All mobile devices (including, but not limited to, laptops, tablets, and smartphones) provided by the Company shall be set to lock, sleep, or similar, after 5 minutes of inactivity, requiring a password, passcode, or other form of log-in to unlock, wake, or similar. Users may not alter this time period.
- 8.11 Users may not use any software which may allow outside parties to access the IT Systems without the express consent of the IT Manager. Any such software must be reasonably required by the User for the performance of their job role and must be fully inspected and cleared by the IT Manager and, where such access renders personal data accessible by the outside party, the Data Protection Officer.
- 8.12 Users may use their own devices (including, but not limited to, laptops, tablets, and smartphones) to access company data, subject to the BYOD Policy which all employees must agree to, and subject to the approval of the IT Department. Any and all instructions and requirements provided by the IT Department governing the use of Users' own devices when connected to the Company network must be followed at all times.
- 8.13 Users' use of their own devices shall be subject to, and governed by, all relevant Company Policies (including, but not limited to, this Policy) while those devices are used to access any part of the Company IT Systems. The IT Department shall reserve the right to request the immediate disconnection of any such devices without notice.

9. Data Storage Security

- 9.1 All data, and in particular personal data, should be stored securely using passwords and strong data encryption.
- 9.2 No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to the Company or otherwise without the approval of the IT Department and Data Protection Officer and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary.
- 9.3 Effort should be made by all users to avoid storing data on the hard drive of their devices, and instead Users should store all company data, in particular personal data, securely in password-protected cloud services approved by the Company and designed for that purpose.
- 9.4 No data, and in particular personal data, should be transferred to another User unless the recipient has agreed to comply fully with the Company's Data Protection Policy and the GDPR.
- 9.5 No data, and in particular personal data, should be transferred to any computer or device personally belonging to a User outside of the Company unless the User in question is a contractor or sub-contractor working on behalf of the Company and that User has signed an NDA, and agreed to comply fully with the Company's Data Protection Policy and the GDPR.

10. Data Protection

- 10.1 All personal data (as defined in the GDPR) collected, held, and processed by the Company will be collected, held, and processed strictly in accordance with the principles of the GDPR, the provisions of the GDPR and the Company's Data Protection Policy.
- 10.2 All Users handling data for and on behalf of the Company shall be subject to, and must comply with, the provisions of the Company's Data Protection Policy at all times. In particular, the following shall apply:
- a) All emails containing personal data must be encrypted using S/MIME or 256 bit encryption;
 - b) All emails containing personal data must be marked "confidential";
 - c) It is understood that as a remote team, access to the internet for company business may not always be private or secured. Employees are required to use a VPN such as Private Internet Access on any unsecured or public networks.
 - d) Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
 - e) Personal data contained in the body of an email, whether sent or received, should be copied directly from the body of that email, and stored securely. The email itself should be deleted. All temporary files associated therewith should also be permanently deleted;
 - f) No personal data should be transferred physically form, whether in hardcopy form or on removable electronic media unless otherwise completely unavoidable;
 - g) Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient;
 - h) Any personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked "confidential"; and
 - i) Where any confidential or personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the User must lock the computer and screen before leaving it. Devices must be set to automatically begin a password-protected screensaver after 5 minutes according to our BYOD policy.
- 10.3 Any questions relating to data protection should be referred to the Data Protection Officer, Helen Lloyd (helen@xavier-analytics.com).

11. Internet and Email Use

- 11.1 All Users shall be subject to, and must comply with, the provisions of the Company's Communications, Email and Internet Policy when using the IT Systems.
- 11.2 Where provisions in this Policy require any additional steps to be taken to ensure IT security when using the internet or email over and above the

requirements imposed by the Communications, Email and Internet Policy, Users must take such steps as required.

12. Reporting IT Security Breaches

- 12.1 Subject to paragraph 12.2, all concerns, questions, suspected breaches, or known breaches shall be referred immediately to the IT Manager.
- 12.2 All concerns, questions, suspected breaches, or known breaches that involve personal data shall be referred immediately 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 notification of a breach, the IT Department shall, within 72 hours, assess the issue including, but not limited to, the level of risk associated therewith, and shall take any and all such steps as the IT Department deems necessary to respond to the issue.
- 12.4 Under no circumstances should a User attempt to resolve an IT security breach on their own without first consulting the IT Department (or the Data Protection Officer, as appropriate). Users may only attempt to resolve IT security breaches under the instruction of, and with the express permission of, the IT Department.
- 12.5 All IT security breaches, whether remedied by the IT Department or by a User under the IT Department's direction, shall be fully documented.

13. Policy Review

The Company shall review this Policy not less than every 6 months and otherwise as required in order to ensure that it remains up-to-date and fit for purpose. All questions, concerns, and other feedback relating to this Policy should be communicated to the IT Manager, James Hulse (james@xavier-analytics.com) and the Data Protection Officer, Helen Lloyd (helen@xavier-analytics.com).

14. Implementation of Policy

This Policy shall be deemed effective as of 05/11/2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

Name: James Hulse

Position: CTO

Date: 05/11/2018

Signature:

