

## **1.0 Purpose**

Kelvin TOP-SET Ltd expects responsible use of email and Instant Messaging. This policy aims to reduce the likelihood of legal liability for the Company or its staff, as well as reducing the likelihood of any breach in security practices or regulations that could jeopardise the business and commercial reputation of the Company or its staff.

While the Company recognises the significant benefits of email and Instant Messaging usage, there are also various problems associated with usage that need to be addressed. Use of email and Instant Messaging both within and outside the Company is not intended to replace personal interaction. Staff are expected and encouraged to choose the best method of communication in any given situation.

## **2.0 Scope**

This policy covers appropriate use of any email and Instant Messaging sent from a Kelvin TOP-SET Ltd email and Instant Messaging address and applies to all employees, contractors, casuals, temporaries and third parties operating on behalf of Kelvin TOP-SET Ltd either from Company premises or remotely.

Kelvin TOP-SET Ltd's email and Instant Message system uses Microsoft Outlook and Microsoft Teams and only the Company's own licensed Microsoft system may be used for the purpose of generating email and Instant Messages.

### **2.1 Exemptions**

It is recognised that from time-to-time staff will have a requirement to send / receive emails under non-company email accounts in order to preserve anonymity. Staff may also have limited access to their corporate email and may require email forwarding to be put in place to their personal accounts. In these cases, staff should, in the first instance, speak with their line manager to prepare a request for exemption.

Similarly, technical support staff may have a requirement to utilise the non-Company provided IM system for the purposes of obtaining immediate, remote support. Again, staff should make a request for an exemption to the Company policy.

If approved, the IT team will put the change into effect. It should be noted that such exemptions will be time limited and granted in respect of an individual only.

## **3.0 Policy**

### **3.1 Prohibited Use**

The Kelvin TOP-SET Ltd email and Instant Messaging system shall not to be used for the creation or distribution of any email and Instant Message for any of the following purposes:

1. To engage in any criminal activity.
2. To disseminate, view, store or forward sexually explicit material for personal interest, use and / or gratification or any other material that is potentially offensive to others (e.g., any

- obscene, racist or criminal materials, or any materials inconsistent with the Company's values and policies).
3. For the unauthorised solicitation of money, gambling, or the operation of a personal business.
  4. Gaining unauthorised access to any computer system either within the Group or any other organisation or entity.
  5. Unauthorised dissemination of internal documents or other communications outside the Group.
  6. Dissemination of chain letters, junk email or similar correspondence.
  7. Making unprofessional, derogatory, or false comments about the Company or any third party whether electronic or otherwise.
  8. Making any statement, which is likely to create any liability (whether criminal or civil) for the member of staff concerned or the Company.
  9. Forwarding of emails that staff know, or suspect may contain a virus.
  10. Intentional or careless dissemination of inaccurate information.
  11. Forwarding Company email to personal Internet-based mail accounts such as AOL, Hotmail, Yahoo and Gmail, unless agreed under the terms of a policy exemption as described in 2.1 above.
  12. Downloading content from Internet-based email accounts to Kelvin TOP-SET Ltd owned or operated laptops computers, PCs, and workstations from within the Kelvin TOP-SET Ltd corporate network.

Employees who receive any email and Instant Messages containing any prohibited content as described above, from any other Kelvin TOP-SET Ltd employee should report the matter to their manager / HR department immediately.

### **3.2 Personal Use**

Incidental and occasional personal use of email and Instant Messaging is acceptable, so long as it does not interfere with staff productivity or conflict with any Kelvin TOP-SET Ltd business activity. Excessive use will be a non-productive use of time and subject to appropriate penalties under the Company's disciplinary policy. Non-work-related email and Instant Messaging must be saved in a separate folder from work related email and Instant Messaging. Sending chain letters or joke emails from a Kelvin TOP-SET Ltd email account is prohibited. Warnings concerning virus or other malware messages should not be forwarded unless they are approved by the Kelvin TOP-SET Ltd IT team.

Kelvin TOP-SET Ltd allows the use of web-based email systems, primarily for business purposes, for example, to retain anonymity as referred to in 2.1 above.

In the case of web-based email systems, as noted above, incidental, and occasional personal use may also be made of these systems if it does not interfere with staff productivity or conflict with any Kelvin TOP-SET Ltd business activity. These systems cannot be used for downloading attachments to personal computers, laptops, or servers. If an attachment needs to be brought into the corporate network, it must be forwarded to a Kelvin TOP-SET email account for that purpose.

### **3.3 Monitoring**

Kelvin TOP-SET Ltd employees shall have no expectation of privacy in anything they store, send or receive on the Company's email and Instant Messaging system. Kelvin TOP-SET Ltd may monitor messages without prior notice (sent, received and in draft form). The Company also reserves the right not to transmit any email and Instant Message. Monitoring may occur in any of the following circumstances, but it should be noted that this list is not exhaustive:

1. To ascertain whether the use of the email and Instant Messaging system is legitimate and in accordance with this policy.
2. To find lost messages or to retrieve messages lost due to computer failure.
3. To assist in the detection or prevention of wrongful and / or criminal acts.
4. To establish the existence of facts relevant to the business.
5. To ensure the effective operation of the electronic communications system.
6. To comply with any legal obligation.

Staff should therefore have no expectation of privacy when using the electronic communications systems for work related purposes. However, investigation will normally only take place where the Company has a reasonable belief that some infringement of this policy is taking place and / or is otherwise necessary and appropriate for the reasons set out above or otherwise.

Kelvin TOP-SET Ltd will not as a rule monitor email and Instant Messaging use that is clearly personal but reserves the right to do so in the event of excessive use of the email and Instant Messaging system, or if such monitoring is necessary for the reasons set out above.

### **3.4 Email Access and Interception**

Other than for monitoring purposes by Kelvin TOP-SET Ltd referred to above, access to a mail file may be required due to staff absence. Access to the content of any staff member's mail file in their absence will only be granted on submission of a written request from their line manager. This request must identify the business need for the access requested, indicate the mail message(s) to be examined and the length of time for which access is required (e.g., in the event of long-term staff absence).

Access will be granted only to the individual's manager (or a member of the Senior Management Staff) on the basis of access to business mails only. The requestor may not in any circumstances access a user's personal emails or messages.

In order to minimise the need for access to be granted, managers should anticipate staff absences wherever possible, and the following rules will apply:

- Leavers – staff should be informed that their mail file may be accessed when they leave; leavers should be asked to advise personal contacts that they should cease to use their Kelvin TOP-SET account.

- Staff on short term absence – the manager concerned should log a call with the IT Staff asking for an out of office message to be set up on the individual's e-mail with alternative contact details / telephone number.
- Staff on Holiday – staff should set out of office notifications describing the length of absence and to whom queries should be addressed whilst the individual is on holiday.

If a situation arises whereby a manager deems it necessary for a temporary employee to access the mailbox of an employee on leave (long term sick leave, maternity leave etc), the employee going on leave must provide the manager with his / her explicit written permission for access to be enabled. Such evidence must be provided as part of the process described above.

Leavers' mailboxes will automatically be deleted three months after the individual has left Kelvin TOP-SET, unless a request is made using the process described above.

### **3.5 Content**

Under no circumstances should email and Instant Messaging be used to enter into any contractual undertaking. Care must be taken that email and Instant Messages are sent only to designated recipients. Consideration should also be given to ensure that email and Instant Messages are appropriate to all recipients to avoid wasting the receiver's time in reading a document when not necessary.

To avoid overloading the system, staff should not send email with attachments when it is possible to use other means, for example, via database storage and use of document links.

When composing an email or Instant Message, staff must comply with good equal opportunities practice. Content should not in any way have the capacity to be construed as harassment on the grounds of race, creed, colour, gender, nationality, ethnic origin, religion, sex change, sexual orientation, marital status, connections with a national minority, membership or non-membership of a trade union, disability, or age.

Staff must not use or send any words or images that have the capacity to upset or distress any person. This includes any words or images which are sexual in nature, have sexual connotations or which include a general sexual innuendo, which are or constitute racial or religious slurs, or which relate to someone's creed, colour, gender, nationality, ethnic origin, sex change, sexual orientation, marital status, connections with a national minority, membership or non-membership of a trade union, disability, or age. Remember, what one member of staff may regard as innocent fun, may be distressing and offensive to others.

Staff who are concerned that an email or Instant Message they intend to circulate may be in breach of the above, should not circulate it but refer the matter to their line manager / HR Department who should vet the email or Instant Message before it is published or circulated. Staff must not send, distribute, or store email, attachments or Instant messages, which breach this policy.

It should be noted that an email or instant message will not include tone of voice or body language, and words on their own can be misinterpreted.

### **3.6 Social Networking and Blogging**

Staff should note that activities that they undertake on social networking sites (including but not limited to Facebook, LinkedIn, Twitter, Instagram, TikTok and Flickr) must follow the same guidelines as set out above, i.e., staff must not make or engage in:

- Unprofessional, derogatory, or false comments about the Company or any third party whether electronic or otherwise.

- Any statement, which is likely to create any liability (whether criminal or civil) for the member of staff concerned or the Company.

Kelvin TOP-SET recognises the value of social networking sites in the workplace, for example there are benefits to be gained from building better business relationships and through targeted marketing. There are, however, concerns around social networking sites particularly in respect of the increased opportunities that they provide for the introduction of malware, spyware, and viruses to Kelvin TOP-SET systems. Staff should also note that excessive amounts of time spent on social networking sites during working hours will be viewed as a non-productive use of time and subject to appropriate penalties under the Company's disciplinary policy

### **3.7 Storage, Backup and Retention**

#### **3.7.1 Storage and Backup**

Email systems and all messages generated on or processed by electronic communications systems, including back-up copies, are the property of Kelvin TOP-SET Ltd.

Kelvin TOP-SET IT staff will back up the servers that host the Company's email system. The nature of these backups is such that they are for the sole purpose of effecting disaster recovery in the event of a server failure / data centre loss. Due to limitations on storage, they are not for the purpose of recovering individual emails or user's mail files.

#### **3.7.2 Retention**

Emails will be retained on the Company's Microsoft servers for a period of fourteen months from the date that the email was created. Once an email (and any attachments associated with it) is aged greater than fourteen months, it will automatically be moved to the archive mailbox. Recurring calendar entries will be exempted from this policy.

Business records such as financial statements or other records and any correspondence connected with any legal proceedings or any other important email and Teams Messages should be retained as hard copy only, for the required period. Retention should be kept to the minimum period only and securely destroyed immediately after. All legal, regulatory, tax, contractual, audit and evidentiary requirements must also be observed.

### **4.0 Enforcement**

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

A contractor found to have violated this policy would be liable to their contract to provide a service terminated.

### **5.0 Definitions**

<b>Term</b>	<b>Definition</b>
<i>Email</i>	The electronic transmission of information through a mail protocol such as SMTP or IMAP. The Kelvin TOP-SET Ltd email system is Microsoft Exchange.
<i>Forwarded email</i>	Email resent from an internal network to an outside point.

*Chain email or letter* Email sent to successive people. Typically, the body of the note has directions to send out multiple copies of the note and may promise good luck or money if the direction is followed.

*Sensitive information* Information is considered sensitive if it can be damaging to Kelvin TOP-SET Ltd or its market standing.

*Virus warning* An email containing warnings about viruses or malware, the overwhelming majority of these emails turn out to be a hoax and contain bogus information usually intent only on frightening or misleading users.

*Instant Messaging* Instant Messaging is a form of electronic communication, which involves immediate correspondence between two or more users who are all online simultaneously. The Kelvin TOP-SET Ltd Instant messaging system is Microsoft Teams.

*Unauthorised Disclosure* The intentional or unintentional revealing of restricted information to people, both inside and outside Kelvin TOP-SET Ltd, who do not have a need to know that information.

*Social Networking* Websites that allow users to share ideas, activities, events, and interests within their individual networks.

*Blogging* A type of web site regularly updated by an individual or entity to comment on events or provide a form of online diary.

## 6.0 Revision History

Who	Date	Revision Type	Revision Number
Scott Bowden	18/10/021	Initial Draft	V0.1
Scott Bowden	14/03/2022	Updated	V0.2
Scott Bowden	30/01/2024	Annual check/update	V0.3