

## **Information Protection Policy**

### **1.0 Purpose**

The purpose of this policy is to protect Kelvin TOP-SET Ltd business information. Unauthorised access, use, or disclosure could impact staff privacy, decrease the Group's competitiveness, impact revenues, or otherwise destroy the information's value.

### **2.0 Scope**

This policy describes Kelvin TOP-SET Ltd.'s approach to protecting business information, be it paper-based or electronically held.

### **3.0 Policy**

1. Data that is considered to be private and confidential, whether held in paper or other formats (e.g., USB stick, external drive, storage card.), should be locked away in a secure office, cabinet or safe when not being used.
2. Where appropriate, non-disclosure and confidentiality agreements should be entered into with third parties and vendors when materials or information of a sensitive or confidential nature are being handled. The Chief Executive should approve all such agreements.
3. Paper-based materials must be disposed of in a secure manner when no longer required, e.g., by secure shredding.
4. Confidential data that is held within computer systems, emails, spreadsheets, or other electronic forms must be protected by a user-id and password. In some cases, additional security measures will be taken, e.g., encryption in the case of particularly confidential company, financial or personal data. Where provided with access privileges, staff must protect and use them responsibly.
5. Electronic data shall also be disposed of in a secure manner when no longer required, e.g., by degaussing storage media, scrubbing hard drives or using Kelvin TOP-SET Ltd approved contractors.
6. Staff should take care when printing sensitive or confidential information, ensuring that only local or secure printers are used for this purpose. Similarly, staff should take care when sending and receiving confidential or sensitive information that has been scanned to be used for email.
7. Staff should be aware that management shall retain the right to access all information used by or for Kelvin TOP-SET. This includes the following information that is:
  - a. Related to staff, external organisations, and people.
  - b. Held on laptops, PCs, servers, network devices, handheld devices and email systems.
  - c. Located on Kelvin TOP-SET Ltd.'s premises or offsite.
  - d. Stored on equipment owned by, used by or held on behalf of Kelvin TOP-SET Ltd.
  - e. Held within system or data files including external public services.
  - f. Held by staff or contractors on their personal or company supplied equipment.
  - g. Contained within backup and copy files.

#### 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.

#### 6.0 Revision History

<b>Who</b>	<b>Date</b>	<b>Revision Type</b>	<b>Revision Number</b>
Scott Bowden	18/10/2021	Initial draft	V0.1
Scott Bowden	14/03/2022	Updated	V0.2
Scott Bowden	30/01/2024	Annual check/update	V0.3