

## SECURITY POLICY

Information Security Management System (ISMS)  
BS ISO/IEC 27001 : 2013

### Introduction

The Advance Change Ltd t/a Actus Software and Actus Learning Information Security Policy applies to all business functions within the scope of the Information Security Management System and covers the information, information systems, networks, physical environment and people supporting these business functions. This document states the Information Security objectives and summarises the main points of the Information Security Policy.

Refer to the 'ACL\_Cloud Principles Policy' for further clarification.

### Objective

The objective of Information Security is to ensure business continuity and minimise business damage by preventing and minimising the impact of security incidents. In particular, information assets must be protected in order to ensure:

1. Confidentiality i.e. protection against unauthorised disclosure
2. Integrity i.e. protection against unauthorised or accidental modification
3. Availability as and when required in pursuance of the Organisation's business objectives.

### Responsibilities

1. The Chief Executive Officer has approved the Information Security Policy.
2. Overall responsibility for Information Security rests with the Operations Director.
3. Day-to-day responsibility for procedural matters, legal compliance including data protection, maintenance and updating of documentation, promotion of security awareness, liaison with external organisations, incident investigation, management reporting etc. rests with the ISMS Manager.
4. Day-to-day responsibility for technical matters, including technical documentation, systems monitoring, technical incident investigation and liaison with technical contacts at external organisations, rests with the ISMS Manager.
5. All employees or agents acting on the Organisation's behalf have a duty to safeguard assets, including locations, hardware, software, systems or information, in their care and to report any suspected breach in security without delay, direct to the ISMS Manager. Employees attending sites that are not occupied by the Organisation must ensure the security of the Organisation's data and access their systems by taking particular care of laptop and similar computers and of any information on paper or other media that they have in their possession.
6. The ISMS Manager is responsible for drafting, maintaining and implementing this Security Policy and similarly related documents as detailed in Appendix II.
7. As with other considerations including Quality and Health & Safety, Information Security aspects are considered in all daily activities, processes, plans, projects, contracts and partnerships entered into by the Organisation.
8. The Organisation's employees are advised and trained on general and specific aspects of Information Security, according to the requirements of their function within the Organisation. The Contract of Employment includes a condition covering confidentiality regarding the Organisation's business.
9. Adherence to Information Security procedures as set out in the Organisation's various policies and guideline documents is the contractual duty of all employees and a clause to this effect is set out in the Organisation's Contracts of Employment.

10. Copies of this Manual, including the Risk Assessment (Annex A Statement of Applicability) are made available to all of the Organisation's employees.
11. Breach of the Information Security policies and procedures by the Organisation's employees may result in disciplinary action, including dismissal.
12. In view of the Organisation's position as a trusted provider of performance management software and related consultancy services, particular care is taken in all procedures and by all employees to safeguard the Information Security of its service users and/or clients.
13. Agreements of Mutual Non-disclosure/Confidentiality are entered into as appropriate with third party Companies.
14. All statutory and regulatory requirements are met and regularly monitored for changes.
15. A Disaster Recovery/Business Continuity Plan is in place. This is maintained, tested and subjected to regular review by the ISMS Manager.
16. Further policies and procedures such as those for access, acceptable use of e-mail and the Internet, virus protection, backups, passwords, systems monitoring etc. are in place, maintained and are regularly reviewed by the ISMS Manager or an appointed representative, as appropriate.
17. This Information Security Policy is regularly reviewed and may be amended by the Chief Executive Officer in order to ensure its continuing viability, applicability and legal compliance, and with a view to achieving continual improvement in the Information Security Systems.