

distriBind
Data Security Policy
31 July 2024

1. Introduction

This document sets out the measures to be taken by **distriBind** (the “Company”) and in order to protect data (electronic and otherwise) collected, held, and processed by the Company in the provision of the distriBind Platform (the “Platform”) to clients and 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.

For the purposes of this Policy, “data” shall refer to the following type(s) of data:

- a) information received by the Company during and discovery or implementation phase of delivering the Platform to Clients
- b) information processed by the Platform in test or evaluation environments hosted by the Company
- c) information processed by the Platform in production environments hosted by the Company

For the purposes of this Policy, “personal data” shall carry the meaning defined in Article 4 of EU Regulation 2016/679 General Data Protection Regulation (“GDPR”): any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

By default, the Platform has no personal data in core structures, however it is likely that in the implementation of the Platform some personal data will be configured for ingestion and processing of Client Data.

2. Key Principles

- 2.1 All IT Systems and data are to be protected against unauthorised access.
- 2.2 All users must only use devices provided to them by the Company,

unless authorised by their Line Manager for specific limited use. No client data or any element of the company code base must be accessed from personal devices.

- 2.3 All IT Systems and data are to be used only in compliance with relevant Company Policies.
- 2.4 Third party (Client) data held in the Platform (whether in test, evaluation, or Production) will be stored in a data centre location nominated by the relevant third party.
- 2.5 Any such data as defined in 2.3 above will not be moved to a different data centre location without prior agreement from the relevant third party.
- 2.6 No third-party data will be accessed or downloaded by employees of the Company, except as required by issues of support and maintenance.
- 2.7 Specific third-party measures may replace or extend these policies, and will be set out in any Support and Maintenance contract in place between the Company and the relevant third party, in line with 5.2 below
- 2.8 If the exercise of access under point 2.5 above results in data being moved to a different data centre location, or accessed from a different location, permission of the relevant third party will be sought before accessing/moving the data.
- 2.9 All employees of the Company and any and all third parties authorised to use the IT Systems and data collected, held, and processed by the Company 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.
- 2.10 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 2.7.
- 2.11 All data must be managed securely in compliance with all relevant parts of the GDPR and all other laws governing data protection whether now or in the future in force.
- 2.12 All data must 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.
- 2.13 All data, whether stored on IT Systems or in hardcopy format, shall be available only to those Users with a legitimate need for access.
- 2.14 All data, whether stored on IT Systems or in hardcopy format, shall be protected against unauthorised access and/or processing.
- 2.15 All data, whether stored on IT Systems or in hardcopy format, shall be

protected against loss and/or corruption.

- 2.16 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 Head of Development unless expressly stated otherwise.
- 2.17 The responsibility for the security and integrity of data that is not stored on the IT Systems lies with the Data Protection Officer.
- 2.18 All breaches of security pertaining to the IT Systems or any data stored thereon shall be reported and subsequently investigated by the Head of Development. Any breach which is either known or suspected to involve personal data shall be reported to the Data Protection Officer and the Chief Executive Officer.
- 2.19 All breaches of security pertaining to data that is not stored on the IT Systems shall be reported and subsequently investigated by the Data Protection Officer. Any breach which is either known or suspected to involve personal data shall be reported to the Data Protection Officer and the Chief Executive Officer.
- 2.20 All Users must report any and all security concerns relating to the IT Systems or to the data stored thereon immediately to the Head of Development. If any such concerns relate in any way to personal data, such concerns must also be reported to the Data Protection Officer and the Chief Executive Officer.
- 2.21 All Users must report any and all security concerns relating to data that is not stored on the IT Systems immediately to the Data Protection Officer. If any such concerns relate in any way to personal data, such concerns must also be reported to the Chief Executive Officer.

3. **Department Responsibilities**

- 3.1 The Head of Development, shall be responsible for the following:
 - a) ensuring that all IT Systems 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 reporting the outcome of such reviews to the Company's senior management;
 - c) ensuring that all Users are kept aware of the IT-related 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 Data Protection Officer, shall be responsible for the following:
- a) ensuring that all other data processing systems and methods are assessed and deemed suitable for compliance with the Company's security requirements;
 - b) ensuring that data 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 non-IT-related 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.
- 3.3 The Head of Development shall be responsible for the following:
- a) assisting all Users in understanding and complying with the IT-related aspects of 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, considering 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, Head of Development and Chief Executive Officer;
 - e) taking proactive action, where possible, to establish and implement IT security procedures and raise User awareness;
 - f) assisting the Head of Development 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; third party environment backup and storage will be inline with any support and maintenance agreement in place with the relevant third party.
- 3.4 The Data Protection Officer shall be responsible for the following:
- a) assisting all Users in understanding and complying with the non-IT-related aspects of this Policy;
 - b) providing all Users with appropriate support and training in data security matters;

- c) ensuring that all Users are granted levels of access to data that are appropriate for each User, considering their job role, responsibilities, and any special security requirements;
- d) receiving and handling reports concerning non-IT-related data security matters and taking appropriate action in response including, in the event that any reports relate to personal data, informing the Data Protection Officer and the Chief Executive Officer
- e) taking proactive action, where possible, to establish and implement security procedures and raise User awareness; and
- f) assisting Line Managers or nominated staff in monitoring data security within the Company and taking all necessary action to implement this Policy and any changes made to this Policy in the future.

4. Users' Responsibilities

- 4.1 All Users must comply with all relevant parts of this Policy at all times when using the IT Systems and data.
- 4.2 All Users must use the IT Systems and data only within the bounds of UK law and must not use the IT Systems or data 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 Head of Development and the Data Protection Officer (and, where such concerns relate to personal data, the Chief Executive Officer) of any and all security concerns relating to the IT Systems or data.
- 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. Third Party Users' Responsibilities

- 5.1 Third parties using the Platform are responsible for ensuring their users use the Platform in compliance with relevant sections of this policy and any internal policies of the third party
- 5.2 Where any third party requires additional measures by the Company in addition or as a replacement to any section of this policy, such measures will be outlined in any Support and Maintenance contract in place between the Company and the relevant third party

6. **Software Security Measures**

- 6.1 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.
- 6.2 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 and the Chief Executive Officer shall be informed immediately.
- 6.3 No Users may install any software of their own, whether that software is supplied on physical media or whether it is downloaded, without the approval of the IT Manager. Any software belonging to Users 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.
- 6.4 All software will be installed onto the IT Systems by the IT Department unless an individual User is given written permission to do so by the IT Manager. Such written permission must clearly state which software may be installed and onto which computer(s) or device(s) it may be installed.

7. **Anti-Virus Security Measures**

- 7.1 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.
- 7.2 All IT Systems protected by anti-virus software will be subject to a full system scan at least 3 months.
- 7.3 All physical media (e.g. USB memory sticks or disks of any kind) used by Users for transferring files must be virus-scanned before any files may be transferred. Such virus scans shall be performed automatically

upon connection / insertion of media.

- 7.4 Users shall be permitted to transfer files using cloud storage systems only with the approval of the Chief Technology, and never in opposition to 2.7 above.
- 7.5 Any files being sent to third parties outside the Company, whether by email, on physical media, or by other means (e.g. shared cloud storage) must be scanned for viruses before being sent or as part of the sending process, as appropriate. All email attachments are scanned automatically upon sending.
- 7.6 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 within 24 hours to limit disruption to the User.
- 7.7 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 and Chief Executive Officer.
- 7.8 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.

8. **Hardware Security Measures**

- 8.1 Wherever practical, IT Systems will be located in rooms which may be securely locked when not in use or, in appropriate cases, at all times whether in use or not (with authorised Users being granted access by means of a key, smart card, door code or similar). Where access to such locations is restricted, Users must not allow any unauthorised access to such locations for any reason.
- 8.2 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.
- 8.3 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. 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.

- 8.4 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.
- 8.5 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, they should be placed inside a lockable case or other suitable container. 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.
- 8.6 The IT Department shall maintain a complete asset register of all IT Systems. All IT Systems shall be labelled, and the corresponding data shall be kept on the asset register.

9. Organisational Security

- 9.1 All Users handling data (and in particular, personal data) personal data will be appropriately trained to do so.
- 9.2 All Users handling data (and in particular, personal data) will be appropriately supervised.
- 9.3 All Users handling data (and in particular, personal data) shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to such data, whether in the workplace or otherwise.
- 9.4 Methods of collecting, holding, and processing data (and in particular, personal data) shall be regularly evaluated and reviewed.
- 9.5 All personal and non-personal data held by the Company shall be reviewed periodically, as set out in the Company's Data Retention Policy.
- 9.6 The performance of those Users handling personal data shall be regularly evaluated and reviewed.
- 9.7 All Users handling personal data will be bound to do so in accordance with the principles of the GDPR and the applicable Company Policies by

contract.

- 9.8 No data, personal or otherwise, may be transferred to any unauthorised User without the authorisation of the Head of Development, Data Protection Officer, or Chief Executive Officer.
- 9.9 All data must be handled with care at all times and should not be left unattended or on view to unauthorised Users or other parties at any time.

10. **Access Security**

- 10.1 Access privileges for all IT Systems and data 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 data which are not reasonably required for the fulfilment of their job roles.
- 10.2 All IT Systems (and in particular mobile devices including, but not limited to, laptops, tablets, and smartphones) shall be protected with a secure password or passcode, or such other form of secure log-in system as the IT Department may deem appropriate and approve. Not all forms of biometric log-in are considered secure. Only those methods approved by the IT Department may be used.
- 10.3 All passwords must, where the software, computer, or device allows:
 - a) be at least 8 characters long;
 - b) contain a combination of upper- and lower-case characters, numbers, and symbols;
 - c) not be obvious or easily guessed (e.g. birthdays or other memorable dates, memorable names, events, or places etc.); and
 - d) be created by individual Users.
- 10.4 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 Head of Development.
- 10.5 If a User forgets their password, this should be reported to the IT Department. 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.

- 10.6 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).
- 10.7 Users may not use any software which may allow outside parties to access the IT Systems without the express consent of the Head of Development. 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 Head of Development and, where such access renders personal data accessible by the outside party, the Data Protection Officer, and the Chief Executive Officer.
- 10.8 Users may connect their own devices (including, but not limited to, laptops, tablets, and smartphones) to the Company networks subject to the approval of the Head of Development. 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. 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 connected to the Company network or to any other part of the IT Systems. The IT Department shall reserve the right to request the immediate disconnection of any such devices without notice.

11. **Data Storage Security**

- 11.1 All data stored in electronic form, and in particular personal data, should be stored securely using passwords and where necessary appropriate data encryption.
- 11.2 All data stored in hardcopy format or electronically on removable physical media, and in particular personal data, should be stored securely in a locked box, drawer, cabinet, or similar.
- 11.3 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 formal written approval of the 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.
- 11.4 No data, and in particular personal data, should be transferred to any computer or device personally belonging to a User unless the User in question is a contractor or sub-contractor working on behalf of the Company and that User has agreed to comply fully with the Company's

Data Protection Policy and the GDPR.

12. Data Protection

- 12.1 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.
- 12.2 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 and/or other data covered by this Policy must be encrypted using Office 365 encryption options.
 - b) All emails containing personal data and/or other data covered by this Policy must be marked "confidential";
 - c) Personal data and/or other data covered by this Policy may be transmitted over secure networks only; transmission over unsecured networks is not permitted under any circumstances;
 - d) Personal data and/or other data covered by this Policy may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
 - e) Personal data and/or other data covered by this Policy 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 deleted;
 - f) All personal data and/or other data covered by this Policy to be transferred physically, including that on removable electronic media, shall be transferred in a suitable container marked "confidential".
 - g) Where any personal data and/or other data covered by this Policy 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.
- 12.3 Any questions relating to data protection should be referred to Data Protection Officer, and where relating to IT systems, the Head of Development.

13. Deletion and Disposal of Data

- 13.1 When any data, and in particular personal data, is to be erased or

otherwise disposed of for any reason (including where copies have been made and are no longer needed), it must be securely deleted and/or disposed of and/or put beyond use.

- 13.2 For further information on the deletion and disposal of personal data, please refer to the Company's Data Retention Policy.

14. Deletion and Disposal of Third-Party Data

- 14.1 When any third-party data, and in particular personal data, is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it will be securely deleted and/or disposed of and/or put beyond use in accordance with any procedure outlined in a Support and Maintenance contract between the Company and the relevant third party.

15. Internet and Email Use

- 15.1 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.
- 15.2 Where provisions in this Policy require any additional steps to be taken to ensure 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.

16. Reporting Security Breaches

- 16.1 Subject to paragraph 14.3, all concerns, questions, suspected breaches, or known breaches that relate to the IT Systems shall be referred immediately to Head of Development and where related to personal data also to the Data Protection Officer and the Chief Executive Officer.
- 16.2 Subject to paragraph 14.3, all concerns, questions, suspected breaches, or known breaches that relate to other data covered by this Policy shall be referred immediately to the Data Protection Officer and where related to personal data also to the Chief Executive Officer
- 16.3 All concerns, questions, suspected breaches, or known breaches that involve personal data shall be referred immediately to The Data Protection Officer and the Chief Executive Officer who shall handle the matter in accordance with the Company's Data Protection Policy.
- 16.4 Upon receiving a question or notification of a breach, the individual or department responsible shall, within 1 working day, assess the issue including, but not limited to, the level of risk associated therewith, and shall take any and all such steps deemed necessary to respond to the issue.



16.5 Under no circumstances should a User attempt to resolve a security breach on their own without first consulting the Head of Development and/or Data Protection Officer.

16.6 All security breaches, howsoever remedied, shall be fully documented.

17. **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 Data Protection Officer.

18. **Implementation of Policy**

This Policy shall be deemed effective as of 31 January 2020. 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: Dave Connors

Date: 31 July 2024

Position: CEO

Date for review: 31 January 2025

Signature: