

Comms-care Group Ltd - Security Statement

Comms-care is committed to securing all aspects of its business, its people and the information and equipment of its customers, partners and suppliers within its control.

To this end the company has an internal security policy, local operating procedures, processes and controls covering all staff at, or for, Comms-care. Collectively these address the key security issues surrounding use of IT equipment inside and outside of the company's secure network environment, including equipment such as Computers (PCs and laptops), tablets, mobile phones and removable/portable storage e.g. USB memory sticks. This scope of coverage, when taken with the security requirements of our customers and suppliers, has been reviewed and is consistent with the list of interested parties, legal and regulatory requirements, internal/external influences on the company and process dependencies and interfaces.

All the security procedures apply equally to the use of equipment on Comms-care site as well as customer's sites, at home, in hotels or in public places.

Our security policies dictate that:

- > Equipment and documentation should be secured when not in use
- > The equivalent of a 'clear desk policy' is in operation when not working
- > Access to computers and their information is restricted to authorised persons only
- > Passwords are protected and not shared
- > Health and safety aspects must be followed

The scope of our security policies covers hardware, software and services issued or approved for use within Comms-care and include:

- > Staff with computers (PCs and laptops) at approved locations
- > Staff permitted to work at home
- > Staff working at any external location
- > Staff issued with loan or temporary devices
- > 3rd Parties contracted on Comms-care behalf to deliver services
- > Mobile phone users
- > Use of Cloud Services

Comprising of logical and physical controls, covering confidentiality, integrity and availability, other areas covered include:

Head office

Cheshire Avenue, Cheshire Business Park, Lostock Gralam, Northwich, Cheshire, CW9 7UA

T: +44 (0) 870 2644 303 F: +44 (0) 870 2644 304

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- > Security on public transport
- > Acceptable use of devices and information
- > Off-site usage including remote access
- > Information and equipment loss
- > How information is
 - Classified
 - Handled
 - Transported
 - Protected
 - Disposed
- > Network device security
- > Malware protection
- > System access but 3rd parties
- > Wireless communication
- > Security incident response

Where customer data is held within cloud services, Comms-care requires controls which match or exceed our internal controls (e.g. ISO27001) and where personally identifiable information is held outside the UK it shall be secured using appropriate controls in line with UK GDPR e.g. EU GDPR, Standard Contractual Clauses (SCC), Binding corporate rules (BCR) etc.

The Comms-care security policies, local operating procedures, supporting documents and controls collectively form the Information Security Management System (ISMS), which includes Risk Assessment and Statement of Applicability tools in support of our ISO27001:2013 certification. Wherever possible, the company seamlessly integrates security requirements into its operational processes.

The objectives/intended outcomes of our ISMS are to:

- > Protect the organisation's business information and any client or customer information within its custody or safekeeping by safeguarding its confidentiality, integrity and availability
- > Establish safeguards to protect the organisation's information resources from theft, abuse, misuse and any form of damage
- > Establish responsibility and accountability for Information Security in the organisation
- > Encourage management and staff to maintain an appropriate level of awareness, knowledge and skill to allow them to minimise the occurrence and severity of Information Security incidents

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- > Ensure that the organisation is able to continue its commercial activities in the event of significant Information Security incidents
- > Provide suitable coverage of International Standard 27001:2013 and overall address the security needs of the company's interested parties
- > Utilise continual improvement to identify and implement improvements within the Information Security Management System (ISMS)
- > Provide a maintainable baseline of security measures and controls which are consistent with the operational context of the company, updated as the perspective of the company changes

The performance of the objectives and extent to which we are achieving our intended outcomes are measured and reviewed at the six-monthly Objective and Metrics Review Board.

Simon Day

Services Director on behalf of the Board of Directors

Last Reviewed Date: February 2021

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