[ISO27002 Clause 18.1.4]

Retirement Capital is committed to compliance with all national and international laws, maintaining appropriate procedures and work instructions. As the company may be required to process NHS patient data, the storage location of this data must be known at all times and retained within the country of origin or in the UK.

Personal data is classified as any data in which the subject of the data can be identified, directly or indirectly. See[*ISMS-C DOC 8.2*](../Control%20A8%20-%20asset%20management/ISMS-C_DOC_8.2.docx).

The policy applies to all personal data held by the company, including on wireless notebook computers, personal digital assistants and mobile telephones.

All employees/staff will be provided with training to ensure that they understand Retirement Capital’s policy and the procedures it has put into place to implement that policy.

The disciplinary process will be invoked in circumstances where this policy may have been transgressed.

List of company specific Data Protection processes are procedures:

ISMS-DP-DOC 19.1 Data Protection Policy

ISMS-DP-DOC-19.2 Statement of legitimate processing

ISMS-DP-DOC-19.3 Data breach reporting procedure

ISMS-DP-DOC-19.5 Security update strategy

ISMS-DP-DOC-19.6 Impact Assessment

ISMS-DP-DOC-19.7 Penetration testing policy

***Document Owner and Approval***

The Information Security Manager is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

A current version of this document is available to all members of staff on the corporate intranet.

This policy was approved by the Board of Directors on 14th November 2020 and is issued on a version-controlled basis under the signature of the Managing Director.

Signature:

Date: 23/05/2019

**Change History Record**

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| --- | --- | --- | --- |
| Issue | Description of Change | Approval | Date of Issue |
| 1 | Initial issue | Gavin McCloskey | 23/05/2019 |
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