MSS-DP-DOC-11.5   
DATA PROTECTION Security Update Strategy

Retirement Capital

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# Revision History

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# Management Summary

This policy states how Retirement Capital manages the update of all software and application used to ensure that they are protected from known vulnerabilities. In summary, all software patches and updates are implemented automatically or as soon as possible within a maximum of eight working hours of when Retirement Capital is notified of the availability of the update.

## 1.1 Data Protection Act 2018

The Data Protection Act 2018 is the UK’s implementation of the General Data Protection Regulation (GDPR). This Data Protection Policy forms the basis for complying with legal data protection requirements as well as the protection of the processed personal data of Retirement Capital

Data protection is essential for Retirement Capital in order to meet the legal requirements for handling person-al data. This data protection Policy is therefore made binding on all the organisation’s internal pro-cesses. This is data protection by design and is fundamental to the company’s policy and attitude to data protection.

Retirement Capital is both a data controller and a data processor as defined under the Act. The former because we hold necessary data on our staff, subcontractors, suppliers and customers. The latter because we provide cloud processing services for government and private sector customers.

Under the Act, everyone responsible for using personal data has to follow strict rules called data protection principles. They must make sure the information is:

• used fairly, lawfully and transparently

• used for specified, explicit purposes

• used in a way that is adequate, relevant and limited to only what is necessary

• accurate and, where necessary, kept up to date

• kept for no longer than is necessary

• handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

This Data Protection Policy regulates the handling of personal data. In particular, it is intended to:

• Assign responsibilities and obligations for all relevant privacy issues,

• Raise awareness of the need for strategic, technical and organisational measures to ensure data protection requirements, and

• Define the procedure for dealing with data Breach incidents.

# Scope

## Scope

The scope of his policy is all approved software and applications used by the company to process data owned by the company or its customers.

## Software and applications employed

Software and applications used by the company fall into the following categories:

* + - 1. Operating system: Microsoft server; Microsoft desktop and Apple desktop.
      2. Installed applications: Including but not limited to Microsoft Office and Google Aps.
      3. Cloud applications: Including but not limited to Google Aps; Sage accounting.
      4. Partner developed software: Including but not limited to Retirement Capital Orchestra.

All software and applications used by any employee or contractor must be approved by the company.

# Update strategy

|  |  |
| --- | --- |
| Software Type | Strategy |
| Operating systems | Validated automatic update from manufacturer |
| Installed applications | Validated automatic update from manufacturer or physical installation within one working day of notification of availability |
| Cloud applications | Supplier responsibility to keep current and mitigate risk |
| Partner developed | Validated automatic update from manufacturer or physical installation within one working day of notification of availability |

## 3.1 Unsupported software and applications

The company policy is to not use unsupported applications and software.