

Information Security Policy

1. Purpose

The purpose of this Policy is to safeguard information belonging to Thomas Johnstone Ltd and its stakeholder (third parties, clients or customers and the general public), within a secure environment.

This Policy informs the Company's employees and other individuals entitled to use Thomas Johnstone Ltd facilities, of the principles governing the holding, use and disposal of information.

It is the goal of Thomas Johnstone Ltd that:

- Information will be protected against unauthorised access or misuse.
- Confidentiality of information will be secured.
- Integrity of information will be maintained.
- Availability of information/information systems is maintained for service delivery.
- Business continuity planning processes will be maintained.
- Regulatory, contractual and legal requirements will be complied with.
- Physical, logical, environmental and communications security will be maintained.
- Infringement of this Policy may result in disciplinary action or criminal prosecution.
- When information is no longer of use, it is disposed of in a suitable manner.
- All information security incidents will be reported to the DPO by the following website Link: Policy Breach, the breach will be recorded then investigated by the DPO. The DPO will then evaluate the breach and if necessary inform the ICO and the Data subject within 72 Hours.

Information relates to:

- Electronic information systems (software, computers, and peripherals) owned by Thomas Johnstone Ltd whether deployed or accessed on site or remotely.
- The Thomas Johnstone Ltd computer network used either directly or indirectly.
- Hardware, software and data owned by Thomas Johnstone Ltd.
- Paper-based materials.
- Electronic recording devices (video, audio, CCTV systems).

2. The Policy

Thomas Johnstone Ltd requires all users to exercise a duty of care in relation to the operation and use of its information systems.

- Authorised users of information systems

With the exception of information published for public consumption, all users of Thomas Johnstone Ltd information systems must be formally authorised by appointment as a member of staff, or by specifically authorised 3rd party working on behalf of Thomas Johnstone Ltd. Authorised users will be in possession of a unique user identity. Any password associated with a user identity must not be disclosed to any other person.

Authorised users will pay due care and attention to protect Thomas Johnstone Ltd information in their personal possession. Confidential, personal or private information must not be copied or transported without consideration of:

- permission of the information owner
- the risks associated with loss or falling into the wrong hands
- How the information will be secured during transport and at its destination.

2.2 Acceptable use of information systems

Use of the Thomas Johnstone Ltd information systems by authorised users will be lawful, and shall have regard to the rights and sensitivities of data subjects.

2.3 Information System Owners

Thomas Johnstone Ltd are responsible for information systems and are required to ensure that:

1. Systems are adequately protected from unauthorised access.
2. Systems are secured against theft and damage to a level that is cost-effective.
3. Adequate steps are taken to ensure the availability of the information system, commensurate with its importance (Business Continuity).
4. Electronic data can be recovered in the event of loss of the primary source. i.e. failure or loss of a computer system, as it is incumbent on all system owners to backup data and to be able to restore data to a level commensurate with its importance (Disaster Recovery).
5. Data is maintained with a high degree of accuracy.
6. Systems are used for their intended purpose and that procedures are in place to rectify discovered or notified misuse.
7. Any electronic access logs are only retained for a justifiable period to ensure compliance with the data protection and ICO, investigatory powers.
8. Any third parties entrusted with Thomas Johnstone Ltd data understand their responsibilities with respect to maintaining its security.

2.4 Personal Information

Authorised users of information systems are not given rights of privacy in relation to their use of Thomas Johnstone Ltd information systems. Duly authorised officers of Thomas Johnstone Ltd may access or monitor personal data contained in any Thomas Johnstone Ltd information system (mailboxes, web access logs, file-store, phones etc).

2.5 Individuals in breach of this policy are subject to disciplinary procedures at the instigation of the DPO and/or Directors with responsibility for the relevant information system, including referral to the Police where appropriate. Thomas Johnstone Ltd will take legal action to ensure that its information systems are not used by unauthorised persons.

3. Ownership

3.1 Thomas Johnstone Ltd have appointed DPO which has direct responsibility for maintaining this policy and providing guidance and advice on its implementation.

Information system owners are responsible for the implementation of this Policy within their area, and to ensure adherence accordingly

Signed:



Name: David Hadow

Position: Joint Managing Director

Date: 14 March 2025