



AMBIENT COMPUTER SERVICES LIMITED

SECURITY AND CONFIDENTIALITY POLICY

June 2013

Ambient Computer Services recognises that it is essential, as part of building good client relations, to comply with the Data Protection Act (1998) and to keep confidential information secure. We are committed, not only to our legal obligations, but also to an environment where confidentiality and information security is an integral part of our company's procedures. We recognise the benefits in having all our employees follow this policy, and of informing our clients of our security and confidentiality procedures.

1 Data Protection Act

- 1.1 Ambient Computer Services is bound by the UK's Data Protection Act (DPA), which protects personal data to limit the risk of harm, and places restrictions on our ability to disclose personal data (information that can be used to identify a person) within the UK and overseas.
- 1.2 The Data Protection Act regulates when and how an individual's personal data may be obtained, held, used, disclosed and generally processed. It applies to computerised processing of personal data and certain paper-based files and records.
- 1.3 To comply with this legislation, data will be collected and used fairly, stored securely and not disclosed to any other person unlawfully. For example, the company will maintain complete and accurate records of all goods sold or returned, and names and addresses of all clients to whom software has been sub-licensed. Our employees follow the Data Protection Principles of the DPA and it is our policy that personal data will be:
 - Processed fairly and lawfully;
 - Obtained for specified and lawful purposes;
 - Adequate, relevant and not excessive;

- Accurate and, where necessary, kept up to date;
- Kept for no longer than is necessary and disposed of securely;
- Processed in accordance with the data subject's rights;
- Protected by appropriate security, especially when being transported between sites;
- Not transferred to other countries without adequate protection.

2 Security

2.1 Ambient Computer Services understands the need for information security and data protection. It is our policy to:

- Keep confidential and personal information in secure storage, or held in an encrypted form, and to securely shred documents when no longer needed;
- Only transport information to clients, or between sites, that is relevant and, if necessary, in a secure format;
- Shut-down computers that hold confidential or personal information when users are away from them.
- While Ambient Computer Services will use all reasonable endeavours to provide a prompt and continuing service, it will not be liable for any loss of data resulting from delays, non deliveries, missed deliveries, or service interruptions caused by events beyond the control of Ambient Computer Services, nor by errors or omissions of the Customer.
- In line with standard industry practice, Ambient Computer Services shall not be liable in the event that it is prevented from fulfilling its obligations to clients in whole or in part due to an event of force majeure (which expression shall mean act of God, fire, flood, storm, power failure, reduction of power supplies, mechanical failure or lack or shortage of materials or stock or any other circumstance beyond the reasonable control of Ambient Computer Services, such as civil disorder, industrial disputes, inclement weather, acts of local or central government or other competent authorities, and failure by other service providers).
- While Ambient Computer Services will use all reasonable endeavours to ensure the security and integrity of its server(s), the company does not guarantee that the server(s) will be free from unauthorized users or hackers, nor from corruption from virus.
- The goods and services installed/ supplied by Ambient Computer Services are intended for standard personal and commercial use, and are not intended for use in critical safety systems, nor in nuclear facilities, other nuclear applications, mass transportation and aviation applications.

3 Confidentiality

- 3.1 As a computer and telecommunications services firm, we understand the need for client confidentiality, and will not discuss nor disclose information when we have not been explicitly authorised to do so.
- 3.2 Where we need to disclose personal or confidential information to other parties as part of the work required, we will obtain appropriate permission beforehand.
- 3.3 We will keep confidential information identified as confidential by clients, or potential clients, which has been received by us with a view to the supply of information technology and telecommunications products, services and applications; we will use and apply such information solely for the evaluation and identification of appropriate products, services and applications, and we will not disclose this information, nor otherwise make it available to any third party. Our obligations shall not apply to any information:
- a) which is public knowledge at the date of disclosure to us, or subsequently becomes public knowledge through no act or failure on our part;
 - b) which is known to the client at the date of disclosure to us and is not subject to any restriction on disclosure imposed by that third party;
 - c) which is disclosed to us by a third party after the date of disclosure by the client and is not the subject of any restriction or disclosure imposed by that third party;
 - d) which is required to be disclosed by us by law or any regulatory or government authority;
 - e) which was developed independently by employees or agents of ours who have not had access to the information disclosed by the client.
- 3.4 Our employees are made aware, and are required to accept our strict undertaking of confidentiality, as per this Policy. Our employees have the same rights to confidentiality and personal data protection as our clients, and we will apply the same policies in relation to them.

4 Employee Responsibilities

- 4.1 Ambient Computer Services emphasises that all employees must follow this security and confidentiality policy and that any deviation from it may lead to disciplinary action.
- 4.2.1 Ambient Computer Services will put in place any reasonable measures that will enable our employees to carry out this policy.
- 4.3 Employees will be provided with appropriate training, support and equipment to enable them to carry out their duties in line with this Policy. Employees are also required to carry out their duties with reasonable care and skill in installing/ configuring goods and services in line with customer specifications.
- 4.4 When employees are in any doubt about their obligations with regards to this policy, they must seek advice from senior management or the Directors.
- 4.5 The company Directors are responsible for the review of this policy on a yearly basis and will monitor changes in the law, and revise this policy as and when necessary.



Signed: _____

Date: June 11th 2013

Barry Neil, Managing Director

Review date: June 2014