

Data Security Policies

This document provides information of data security policies for North Eastern Carrying Corporation that covers key areas of such concern. NECC is committed to identify any additional areas that require policy in accordance with our users, data, regulatory environment and other relevant factors.

The three policies are:

1. Data security policy: Employee requirements
2. Data security policy: Data Leakage Prevention
3. Data security policy: Workstation Full Disk Encryption

1. Data security policy: Employee requirements

1.0 Purpose

North Eastern Carrying Corporation Limited must protect restricted, confidential or sensitive data from loss to avoid reputation damage and to avoid adversely impacting our customers. The protection of data in scope is a critical business requirement, yet flexibility to access data and work effectively is also critical.

It is not anticipated that this technology control can effectively deal with the malicious theft scenario, or that it will reliably detect all data. It's primary objective is user awareness and to avoid accidental loss scenarios. This policy outlines the requirements for data leakage prevention, a focus for the policy and a rationale.

2.0 Scope

- . Any employee, contractor or individual with access to NECC's Systems or data.
- . Definition of data to be protected

- . Customer Information
- . Financial/Transactional Data
- . MIS Reports or other Restricted/Sensitive
- . Email Communication/ Phone recording / CCTV Footage

3.0 Policy – Employee requirements

1. Employee need to complete NECC LTD's security awareness training and agree to uphold the acceptable use policy.
2. If you identify an unknown, un-escorted or otherwise unauthorized individual in NECC LTD you need to immediately notify.
3. Visitors to NECC LTD must be escorted by an authorized employee at all times. If you are responsible for escorting visitors you must restrict them appropriate areas.
4. You are required not to reference the subject or content of sensitive or confidential data publically, or via systems or communication channels not controlled by NECC LTD. For example, the use of external e-mail systems not hosted by NECC LTD to distribute data is not allowed.
5. Please keep a clean desk. To maintain information security you need to ensure that all printed in scope data is not left unattended at your workstation.
6. You need to use a secure password on all NECC LTD systems as per the password policy. These credentials must be unique and must not be used on other external systems or services.
7. Terminated employees will be required to return all records, in any format, containing personal information. This requirement should be part of the employee on boarding process with employees signing documentation to confirm they will do this.
8. You must immediately notify in the event that a device containing in scope data is lost (e.g. mobiles, laptops etc).
9. In the event that you find a system or process which you suspect is not compliant with this policy or the objective of information security you have a duty to inform so that they can take appropriate action.

10. If you have been assigned the ability to work remotely you must take extra precaution to ensure that data is appropriately handled. Seek guidance from if you are unsure as to your responsibilities.
11. Please ensure that assets holding data in scope are not left unduly exposed, for example visible in the back seat of your car.
12. Data that must be moved within NECC LTD is to be transferred only via business provided secure transfer mechanisms (e.g. encrypted USB keys, file shares, email etc).NECC LTD will provide you with systems or devices that fit this purpose. You must not use other mechanisms to handle in scope data. If you have a query regarding use of a transfer mechanism, or it does not meet your business purpose you must raise this with.
13. Any information being transferred on a portable device (e.g. USB stick, laptop) must be encrypted in line with industry best practices and applicable law and regulations. If there is doubt regarding the requirements, seek guidance from.

2. Data security policy: Data Leakage Prevention

Data leakage prevention is designed to make users aware of data they are transferring which may be sensitive or restricted in nature.

1.0 Purpose

NECC must protect restricted, confidential or sensitive data from loss to avoid reputation damage and to avoid adversely impacting our customers. The protection of in scope data is a critical business requirement, yet flexibility to access data and work effectively is also critical.

It is not anticipated that this technology control can effectively deal with the malicious theft scenario, or that it will reliably detect all data. It's primary objective is user awareness and to avoid accidental loss scenarios. This policy outlines the requirements for data leakage prevention, a focus for the policy and a rationale.

2.0 Scope

1. Any NECC's device which handles customer data, sensitive data, personally identifiable information or company data. Any device which is regularly used for e-mail, web or other work related tasks and is not specifically exempt for legitimate business or technology reasons.
2. The NECC's information security policy will define requirements for handling of information and user behaviour requirements. This policy is to augment the information security policy with technology controls.
3. Exemptions: Where there is a business need to be exempted from this policy (too costly, too complex, adversely impacting other business requirements) a risk assessment must be conducted being authorized by security management.

3.0 Policy

1. Company data leakage prevention policy will scan for any data breach.
 - a. Credit card details, bank account numbers and other financial identifiers.
 - b. E-mail addresses, names, addresses and other combinations of personally identifiable information.
 - c. Documents that have been explicitly marked with the Company Confidential' string.
1. DLP will identify specific content, i.e. Sales data – particularly forecasts, renewals lists and other customer listings
2. Exports of personally identifiable information outside controlled systems (this is data that you are particularly concerned about losing and wish to ensure is detected by the DLP policy).
3. DLP will be configured to alert the user in the event of a suspected transmission of sensitive data, and the user will be presented with a choice to authorize or reject the transfer. This allows the user to make a sensible decision to protect the data, without interrupting business functions. Changes to the DLP product configuration will be handled through the NECC's IT change process and with security management approval, to

identify requirements to adjust the information security policy or employee communications.

4. DLP will log incidents centrally for review. The IT team will conduct first level triage on events, identifying data that may be sensitive and situations where its transfer was authorized and there is a concern of inappropriate use. These events will be escalated to HR to be handled through the normal process and to protect the individual.
5. Where there is an active concern of data breach, the IT incident management process is to be used with specific notification provided to (for example HR, Legal and Security Management).
6. Access to DLP events will be restricted to a named group of individuals to protect the privacy of employees. A DLP event does not constitute evidence that an employee has intentionally, or accidentally lost data but provides sufficient basis for investigation to ensure data has been appropriately protected.

4.0 Technical guidelines

Technical guidelines identify requirements for technical implementation and are typically technology specific.

1. The technology of choice is a software tool/ Firewall.
2. The product will be configured to identify data in motion to Browsers, IM Clients, E-mail clients, Mass storage devices and writable CD media.

5.0 Reporting requirements

1. Weekly reports of incidents to analyze by concerned Department.
2. High priority incidents discovered by IT should be immediately flagged with.
3. Monthly report showing 99% devices compliant with DLP policy.

3. Data security policy: Workstation Full Disk Encryption

Full disk encryption is now a key privacy enhancing technology which is mandated by many regulatory guidelines.

1.0 Purpose

NECC must protect restricted, confidential or sensitive data from loss to avoid reputation damage and to avoid adversely impacting our customers. A collection of global regulations (such as) also require the protection of a broad scope of data, which this policy supports by restricting access to data hosted on devices.

As defined by numerous compliance standards and industry best practice, full disk encryption is required to protect against exposure in the event of loss of an asset. This policy defines requirements for full disk encryption protection as a control and associated processes.

2.0 Scope

1. All NECC's workstations – desktops and laptops depending on the type of data you hold, for the physical security use cover to protect such device.
2. All NECC's virtual machines should be under tech expert monitoring with regular audit.
3. Exemptions: Where there is a business need to be exempted from this policy (too costly, too complex, adversely impacting other business requirements) a risk assessment must be conducted being authorized by security management. See Risk Assessment process (reference your own risk assessment process).

3.0 Policy

1. All devices in scope will have full disk encryption enabled.
2. Company Acceptable Use Policy (AUP) and security awareness training must require users to notify if they suspect they are not in compliance with this policy as per the AUP.
3. The AUP and security awareness training must require users to notify of any device which is lost or stolen.

4. Encryption policy must be managed and compliance validated by. Machines need to report to the central management infrastructure to enable audit records to demonstrate compliance as required.
5. Where management is not possible and a standalone encryption is configured (only once approved by a risk assessment), the device user must provide a copy of the active encryption key to IT. It has the right to access any encrypted device for the purposes of investigation, maintenance or the absence of an employee with primary file system access. AUP and security awareness training will advise users of this requirement
6. The encryption technology must be configured in accordance with industry best practice to be hardened against attacks.
7. All security related events will be logged and audited by to identify inappropriate access to systems or other malicious use.
8. The help desk will be permitted to issue an out-of-band challenge/response to allow access to a system in the event of failure, lost credentials or other business blocking requirements. This challenge/response will be provided only in the event that the identity of the user can be established using challenge and response attributes documented in the password policy.
9. A group of sensitive data/VIP users will be identified by the restricted data policy. Users in this group will require a member of *(e.g. Senior Management or IT)* authorization for key changes or challenge response. The help desk will not be permitted to access said systems without authorization. These systems are identified as having access to highly sensitive, restricted use data and have a requirement for separation of duty. Where identified by the authentication and restricted data policy, a system/user will be required to use two factor authentications in accordance with the defined standard. The authentication will occur in the pre boot environment.
10. Configuration changes are to be conducted through the change control process, identifying risks and noteworthy implementation changes to security management.