



Gemserv Information Security Policy

STATEMENT OF INTENT

This policy sets out Gemserv's commitment to maintaining the confidentiality, availability and integrity of all information it holds and related processes in accordance with internationally recognised standards and relevant legal requirements. Information is a key asset and at the core of the services that we deliver to our clients. This policy provides the guiding principles and responsibilities necessary to safeguard the security of Gemserv's information systems. Supporting policies, codes of practice, procedures and guidelines provide further details. We manage the provision and the security of our information through continuous improvement, audit, adhering to relevant controls and by maintaining appropriate insurances.

This policy is underpinned by the ISMS and shall apply to all Gemserv's business activities, employees & contractors, and properties.

THE SERVICES GEMSERV PROVIDES

Gemserv Limited is a medium-sized, office-based consultancy located in the City of London. Gemserv's services focus on the provision of consultancy, market design, governance, information security, operational and administrative services to clients predominantly in the Energy, Health and Public sectors in the UK and Ireland.

POLICY COMMITMENT

The Board and Management of Gemserv are totally committed to preserving the confidentiality, integrity and availability of all the physical and electronic assets throughout the organisation. This commitment is made to safeguard Gemserv's competitive position in the market; its profitability, cash-flow, legal, regulatory, contractual compliance and brand. Gemserv regards the lawful and correct treatment of personal information belonging to its stakeholders and other interested parties as very important to our successful operations.

The information security requirements, as defined and operated within the Information Security Management System (ISMS), are intended to enable appropriate information sharing whilst reducing business related risks to acceptable levels.

To this end we fully endorse and adhere to the principles of Data Protection, as enumerated in the Data Protection Act 2018. Gemserv is also committed to adhering to all the legislative and legal requirement within the scope of business in UK.



Gemserv's senior management is committed to satisfying applicable requirements by ensuring that customer and applicable statutory and regulatory requirements are determined, understood and consistently met. Ensure that the relevant needs and expectations of Interested Parties are considered and met if deemed to be compliance obligations.

IMPLEMENTATION AND MONITORING

The Governance, Risk and Compliance Committee (GRCC), comprising members of Gemserv's Executive Team and chaired by the CEO, will support the ISMS framework and periodically review this policy. Reviews will take into account any changes in the Risk Assessment or Risk Treatment Plan and will be undertaken at least bi-annually. Gemserv will measure the effectiveness of the ISMS and ensure continuous improvement through regular internal and external audits.

The responsibility lies with the GRCC which is responsible to set access rules according to business needs. The application of technological security controls and access restrictions is Gemserv's Governance, Risk and Compliance Team's responsibility, according to the needs expressed by the GRCC.

Gemserv's risk management framework provides the context for identifying, assessing, evaluating and controlling information-related risks through the maintenance of the ISMS. The Risk Assessment, Statement of Applicability and Risk Treatment Plan will identify how information related risks are controlled.

In particular, business continuity, data backup procedures, avoidance of viruses and hackers, access control to systems and information security incident reporting are fundamental to this policy. Control objectives for each of these will be supported by specific, documented policies and procedures.

This policy is communicated to all employees and organisations working for or on behalf of Gemserv. Employees and other organisations are expected to co-operate and assist in the implementation of this policy, whilst ensuring that their own work, so far as is reasonably practicable, is carried out without risk to themselves, others, or towards the Confidentiality, Integrity and Availability of services we provide.

In support of this policy, Gemserv maintains certification of its ISMS to ISO/IEC 27001:2013.

Alex Goody

Chief Executive

30th September 2019