Cannon Electrical Services Limited

Industrial and Commercial Electrical Engineers

<u>Cannon Electrical's procedures to comply with GDPR for ISO 27001:-</u> 1. That appropriate levels of security are in place in compliance with, ISMS – GDPR to meet the procedural requirements of ISO27001 & data eradication and retrieval.

General Data Protection Regulations (GDPR) - ISO 27001 requires a company to establish, implement and maintain a continuous improvement approach to manage its Information Security Management System (ISMS). As with any other ISO compliance, ISO 27001 follows the plan-do-check-act (PDCA) cycle, as shown in figure 1.



Cannon Electrical Services Ltd's Information Security Management System (ISMS)-Planning for ISO/IEC 27001 and its supporting document, ISO/IEC 27002 (ISO/IEC 17799), detail which are organized into 11 sections.

These sections specify the best practices for:-

- 1/Business continuity planning.
- 3/System acquisition, development and maintenance.
- 5/Information security incident management.
- 7/Personnel security.
- 9/Communication and operations management.
- 11/Security policies.

2/System access control.
4/Physical and environmental security.
6/Compliance.
8/Security organization
10/Asset classification and control Continued.



Directors: C. C. CANNON (Managing) S. A. CANNON (Secretary) P. CANNON (Director) A. P. CANNON (H&S Director) APPROVED CONTRACTOR Registered Office: 6A Pickering Street Leeds LS12 2QG Registered in England No. 2134116

GDPR, ISO 27001- Implementation and Design:-

ISO 27001 (formally known as ISO/IEC 27001:2005):-

Is a specification for an Information Security Management System (ISMS). An ISMS is a framework of policies and procedures that includes all legal, physical and technical controls involved in an organisation's information risk management processes.

<u>Planning:-</u> As in all compliance and certification initiatives, consideration of the organization's size, the nature of its business, the maturity of the process in implementing ISO 27001 and commitment of senior management are essential. The most important departments and activities that will be vital to the success of the project include:

<u>Internal audit:-</u> During the initial planning phase, the input from internal audit will be useful in developing an implementation strategy, and early involvement of internal auditors will be useful during the later stages of certification that require review by management.

<u>IT:-</u>Cannon's IT Department Hub have been provided with dedicate resources and time to implement the activities associated with the ISO 27001 initiatives. Our existing inventory of IT compliance procedures and policies, and the maturity of Cannon Electrical's existing IT processes and controls, were useful in gaining a clear understanding of how best for Cannon to interface our existing ISMS processes, to align with ISO 27001 requirements. Although implementation of policies and procedures is largely perceived as an IT activity, we involve all staff to play an important role in the implementation. For example, our R&D IT development Hub is largely responsible for physical security and access controls of all Cannon IT services but all staff who work on Access, CCTV and Security Systems participate in also maintaining and keeping data secure.

<u>Internal GDPR development:-</u> Cannon Electrical Services Limited's own IT department under Mr Matthew Wood (IT Supervisor), based on the campus of the University of Bradford's at its Research & Development Hub-Computing, is responsible in accordance with The Managing Director's (C. C. Cannon) requirements. In the implementation and security of the relevant company-client confidential and electronic data and documentation, to meet the requirements of Cannon Electrical's ISMS. It is also tasked with the removal and securely eradication of any such redundant data but with the ability if so required of retrieval of such data.

This Privacy Notice on Cannon's GDPR gives you a comprehensive overview about how we handle data securely at Cannon Electrical Services Ltd, including such information we may collect from our customers (names-phone numbers-addresses and job related documents), we respect an individuals' right to privacy and to the protection of personal information. The purpose of this Privacy Notice is to explain how we collect and use personal information in connection with our business. "personal information" means information about a living individual who can be identified from that information (either by itself or when it is combined with other information). ISO 27001 requires we explain in detail to our clients about the information we hold, what we do with this data and with whom we share it outside of Cannon's ISMS

You can request a copy of any data we have, copied and held in our client data base, please contact us if you have any quires on the above information documentation. We may update our Privacy Notice from time to time, when we do we will communicate any changes to you and publish the updated Privacy Notice on our website. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.

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2. Controls are in place for removing data no longer required, whilst ensuring enough data is retained to meet regulatory requirements

ISO 27001 requires a company to establish, implement and maintain a continuous improvement approach to manage its Information Security Management System (ISMS).

The Cannon Electrical Services Ltd IT department will (to be agreed with client) periodically remove inactive stored security coded, ISMS data/documentation with a "Security Authorized Only" ability to carry out such an exercise for our own and client's requirements. Sufficient documentation will be retained and stored to meet with regulatory requirements.

This facility will be under the direct Cannon Electrical's control and ISMS implemented by Cannon Electrical Services Limited's own IT department, at its Research & Development Hub-Computing. In accordance with The Managing Director's (C. C. Cannon) requirements, for the implementation and security of all the relevant company-client confidential and electronic documentation and data to meet the requirements of Cannon Electrical's ISMS.

3. That processes are in place to comply with GDPR requirements e.g. data can be retrieved to respond to a data subject request and data is deleted once you're informed that CES no longer requires this data.

Cannon Electrical Services Ltd, Procedure's to Retrieve data/documents.

ISO 27001 requires a company to establish, implement and maintain a continuous improvement approach to manage its Information Security Management System (ISMS).

The Cannon Electrical Services Ltd IT department will (to be agreed with client) have the ability to retrieve inactive stored security coded, ISMS data/documentation with a "Security Authorized Only" ability to apply for the "Reactivation of Same Documentation Clearance" with the client's agreement to meet its requirements. Such data as is required by a client requiring this action of retrieval of inactive stored security coded, ISMS data/documented after a procedure has been agreed to provide the ability to apply for the "Reactivation of Same Documentation of Same Documentation Clearance" for our own and the client's requirements.

This facility will be under the direct control and implemented by Cannon Electrical Services Ltd's own IT department, at its Research & Development Hub-Computing, under and in accordance with The Managing Director's (C. C. Cannon) requirements, in the implementation and security of all the relevant company-client confidential and electronic documentation to meet the requirements of Cannon Electrical's ISMS.

4. How you will ensure that sufficient details are captured to comply with GDPR

Cannon Electrical Services Ltd, Procedure's to Capture Sufficient data/documents.

ISO 27001 requires a company to establish, implement and maintain a continuous improvement approach to manage its Information Security Management System (ISMS).

Continued.

The Cannon Electrical Services Ltd, IT department will ensure that sufficient data will be retained and stored to meet with regulatory requirements and by establishing 'The Clients' data retention requirements. All data/documents will be stored initially whilst 'Live' in 'Date Logged In' and 'Job/Quotation Reference Identification' files, with a CES Time for Review Code, periodically checked for removal as in our ISMS for data/documentation.

The ISMS facility will be under the direct control and implementation by Cannon Electrical Services Limited's own IT department, at its Research & Development Hub-Computing, managed by Matthew Wood (Cannon's IT) and meeting the requirements (agreed with client), in the implementation and security of all the relevant company-client stored, confidential and data/documentation, to meet the requirements of Cannon Electrical's ISMS.

5. How a breach of the GDPR would be reported to CES

Procedure's to report promptly a breach of GDPR to Cannon's management.

ISO 27001 requires a company to establish, implement and maintain a continuous improvement approach to manage its Information Security Management System (ISMS) and <u>promptly report any security data breaches</u>.

The Cannon Electrical Services Ltd IT department will ensure that data security systems will be maintained and able to protect data stored in it, to meet with regulatory GDPR requirements and those additional requirements (if any) establishing by Cannon Electrical with its Client's in their data storage requirements.

All data/documents will be stored in Date Logged In and Reference Identification, with a CES Time for Review Code periodically checked for their removal. The ISMS through its "Security Authorized Only" procedure will have a 'Used Log' indication ability. The ISMS facility will be under the direct control and implementation by Cannon Electrical Services Limited's own IT department, at its Research & Development Hub-Computing, by Matthew Wood (Cannon's IT) meeting the agreed client requirements, in the implementation and security of all the relevant company-client confidential and data/documentation to meet the requirements of Cannon Electrical's ISMS.

6. Review of the process for on-going GDPR compliance Review of the process for on-going GDPR compliance:-

General Data Protection Regulations (GDPR) - ISO 27001 requires a company to establish, implement and review of the process for on-going GDPR compliance and its Information Security Management System (ISMS). As with any other ISO compliance, ISO 27001 it will follow where practical, the plan-do-check-act (PDCA) cycle, as shown in figure 1.

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(continued) Although the implementation of policies and procedures is largely perceived as an IT activity, all employees who interface with data, play an important role in the companies ISMS implementation. For example, facilities staff who are responsible for the physical commissioning of security and access controls, Fire & Burglar Alarms and remote control equipment. Cannon Electrical Services Limited's own IT department under Matthew Wood, is responsible in accordance with The Managing Director's (C. C. Cannon) requirements, in the implementation and security of the relevant company-client confidential data and electronic documentation, to meet the requirements of Cannon Electrical's ISMS.

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Christopher C Cannon Managing Director

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