

Acceptable Usage Policy

This Acceptable Usage Policy covers the security and use of all Startright Training Limited's information and IT equipment. It also includes the use of email, internet, voice and mobile IT equipment. This policy applies to all Startright Training's employees, contractors and agents (hereafter referred to as 'individuals').

This policy applies to all information, in whatever form, relating to Startright's business activities worldwide, and to all information handled by Startright Training Limited relating to other organisations with whom it deals. It also covers all IT and information communications facilities operated by Startright Training Limited or on its behalf.

Computer Access Control – Individual's Responsibility

Access to the Startright Training Limited's IT systems is controlled by the use of User IDs, passwords and/or tokens. All User IDs and passwords are to be uniquely assigned to named individuals and consequently, individuals are accountable for all actions on the Startright Training Limited's IT systems.

Individuals must not:

• Allow anyone else to use their user ID/token and password on any Startright IT system.

• Leave their user accounts logged in at an unattended and unlocked computer.

• Use someone else's user ID and password to access Startright Training IT systems.

- · Leave their password unprotected (for example writing it down).
- Perform any unauthorised changes to Startright Training Ltd IT systems or information.
- Attempt to access data that they are not authorised to use or access.
- Exceed the limits of their authorisation or specific business need to interrogate the system or data.
- Connect any non-startright Training Limited authorised device to the Startright Training Limited network or IT systems.

• Store Startright data on any non-authorised Startright Training Limited equipment.

• Give or transfer Startright Training Limited data or software to any person or organisation outside Startright without the authority of the Directors of Startright Training Limited.

Managers must ensure that individuals are given clear direction on the extent and limits of their authority with regard to IT systems and data.

Internet and email Conditions of Use.

Use of Startright Training Limited internet and email is intended for business use. Personal use is permitted where such use does not affect the individual's business performance, is not detrimental to Startright Training Limited in any way, not in breach of any term and condition of employment and does not place the individual or Startright in breach of statutory or other legal obligations.

All individuals are accountable for their actions on the internet and email systems.

Individuals must not:

- Use the internet or email for the purposes of harassment or abuse.
- Use profanity, obscenities, or derogatory remarks in communications.
- Access, download, send or receive any data (including images), which Startright Training Limited considers offensive in any way, including sexually explicit, discriminatory, defamatory or libellous material.
- Use the internet or email to make personal gains or conduct a personal business.
- Use the internet or email to gamble.
- Use the email systems in a way that could affect its reliability or effectiveness, for example distributing chain letters or spam.
- Place any information on the Internet that relates to Startright Training Limited, alter any information about it, or express any opinion about Startright Training Limited, unless they are specifically authorised to do this.
- Send unprotected sensitive or confidential information externally.
- Forward Startright Training Limited mail to personal non-Startright Training Limited email accounts (for example a personal Hotmail account).
- Make official commitments through the internet or email on behalf of Startright Training Limited unless authorised to do so.

• Download copyrighted material such as music media (MP3) files, film and video files (not an exhaustive list) without appropriate approval.

• In any way infringe any copyright, database rights, trademarks or other intellectual property.

• Download any software from the internet without prior approval of the IT Department.

• Connect Startright devices to the internet using non-standard connections.

Clear Desk and Clear Screen Policy

In order to reduce the risk of unauthorised access or loss of information, Startright Training Limited enforces a clear desk and screen policy as follows:

• Personal or confidential business information must be protected using security features provided for example secure print on printers.

• Computers must be logged off/locked or protected with a screen locking mechanism controlled by a password when unattended.

• Care must be taken to not leave confidential material on printers or photocopiers.

• All business-related printed matter must be disposed of using confidential waste bins or shredders.

Working Off-site

It is accepted that laptops and mobile devices will be taken off-site. The following controls must be applied:

• Working away from the office must be in line with Startright Training Limited remote working policy.

• Equipment and media taken off-site must not be left unattended in public places and not left in sight in a car.

• Laptops must be carried as hand luggage when travelling.

• Information should be protected against loss or compromise when working remotely (for example at home or in public places). Laptop encryption must be used.

• Particular care should be taken with the use of mobile devices such as laptops, mobile phones, smartphones and tablets. They must be protected at least by a password or a PIN and, where available, encryption.

Mobile Storage Devices

Mobile devices such as memory sticks, CDs, DVDs and removable hard drives must be used only in situations when network connectivity is unavailable or there is no other secure method of transferring data. Only Startright Training Limited authorised mobile storage devices with encryption enabled must be used, when transferring sensitive or confidential data.

Software

Employees must use only software that is authorised by Startright Training Limited on Startright Training Limited computers. Authorised software must be used in accordance with the software supplier's licensing agreements. All software on Startright Training Limited computers must be approved and installed by the Startright Training Limited IT department.

Individuals must not:

• Store personal files such as music, video, photographs or games on Startright Training Limited IT equipment.

Viruses

The IT department has implemented centralised, automated virus detection and virus software updates within Startright Training Limited. All PCs have antivirus software installed to detect and remove any virus automatically.

Individuals must not:

• Remove or disable anti-virus software.

• Attempt to remove virus-infected files or clean up an infection, other than by the use of approved Startright anti-virus software and procedures.

Telephony (Voice) Equipment Conditions of Use

Use of Startright Training Limited voice equipment is intended for business use. Individuals must not use Startright's voice facilities for sending or receiving private communications on personal matters, except in exceptional circumstances. All non-urgent personal communications should be made at an individual's own expense using alternative means of communications.

Individuals must not:

- Use Startright Training Limited's voice for conducting private business.
- Make hoax or threatening calls to internal or external destinations.
- Accept reverse charge calls from domestic or International operators, unless it is for business use.

Actions upon Termination of Contract

All Startright Training Limited equipment and data, for example laptops and mobile devices including telephones, smartphones, USB memory devices

and CDs/DVDs, must be returned to Startright Training Limited at termination of contract.

All Startright Training Limited data or intellectual property developed or gained during the period of employment remains the property of Startright Training Limited and must not be retained beyond termination or reused for any other purpose.

Monitoring and Filtering

All data that is created and stored on Startright Training Limited computers is the property of Startright Training Limited and there is no official provision for individual data privacy, however wherever possible Startright Training Limited will avoid opening personal emails.

IT system logging will take place where appropriate, and investigations will be commenced where reasonable suspicion exists of a breach of this or any other policy. Startright Training Limited has the right (under certain conditions) to monitor activity on its systems, including internet and email use, in order to ensure systems security and effective operation, and to protect against misuse.

Any monitoring will be carried out in accordance with audited, controlled internal processes, the UK Data Protection Act 2018, the Regulation of Investigatory Powers Act 2000 and the Telecommunications (Lawful Business Practice Interception of Communications) Regulations 2000.

This policy must be read in conjunction with:

- Computer Misuse Act 1990
- Data Protection Act 2018

It is your responsibility to report suspected breaches of security policy without delay to your management.

All breaches of information security policies will be investigated. Where investigations reveal misconduct, disciplinary action may follow in line with Startright Training Limited disciplinary procedures.