0330 128 9892
admin@oscar-research.co.uk

Information Security Policy
Version 1.2
Date: 3rd Feb 2026
Owner: Data Protection & Security Lead
Approved By: Director
Review Cycle: Annual or upon material change

Oscar Research Ltd is committed to maintaining the confidentiality, integrity, and availability of its information assets. Security controls are implemented proportionately to risk and aligned with UK GDPR Article 32 and recognised industry standards. All employees and contractors are required to comply with this policy.

---

1. Purpose

This policy defines the technical and organisational security measures implemented by Oscar Research Ltd to protect information assets and personal data in accordance with:

- **UK GDPR**
- **Data Protection Act 2018**
- **Data (Use and Access) Act 2025**
- **PECR**
- **ICO guidance**

This policy supports the protection of information assets against threats to:

- **Confidentiality**
- **Integrity**
- **Availability**

---

2. Scope

Applies to:

- **All employees**
- **All systems**
- **All client data**
- **All hosted infrastructure**
- **All third-party providers**

0330 128 9892
admin@oscar-research.co.uk

3. Governance & Accountability

- **Oscar Research Ltd is ICO registered (Z465912X)**
- **Security oversight is managed by Director/Data Protection Lead**
- **Policies reviewed annually**
- **Risk register maintained**
- **Security responsibilities documented**

This policy is formally approved by the Director and communicated to all staff. Compliance is mandatory.

---

4. Information Classification & Handling

- **Data classified as Public / Internal / Confidential**
- **Postholder data classified as Confidential**
- **Access limited by role**
- **Secure handling procedures enforced**

---

5. Access Control

- **Unique user IDs**
- **No shared credentials**
- **Role-based access control (RBAC)**
- **MFA for remote admin access**
- **Periodic access review**
- **Immediate revocation upon role change**

---

6. Secure Infrastructure

- **Hosted within secure UK cloud environment**
- **Disk-level encryption**
- **TLS encryption for all data in transit**
- **Firewall-protected perimeter**
- **Network segregation**
- **Linux hardened servers**
- **Unnecessary services disabled**
- **Patch management cycle enforced**

0330 128 9892
admin@oscar-research.co.uk

7. Vulnerability & Patch Management

- **Regular vulnerability assessments**
- **Critical patches prioritised**
- **Dependency reviews**
- **Version control for code**
- **Test/staging separated from production**

---

8. Anti-Malware & Endpoint Security

- **Centrally managed anti-malware**
- **Authentication enforced on devices**
- **Device encryption applied where appropriate**
- **Log monitoring enabled**

---

9. Monitoring & Logging

- **Authentication logs retained**
- **Access logs recorded**
- **Incident detection procedures defined**
- **Hosting layer intrusion detection**

---

10. Incident Response

- **Formal Incident Response Plan**
- **Severity classification**
- **Escalation procedure**
- **ICO notification protocol (72-hour rule)**
- **Post-incident review**

0330 128 9892
admin@oscar-research.co.uk

11. Business Continuity & Disaster Recovery

- **Encrypted offsite backups**
- **Documented restoration procedures**
- **BCP reviewed biennially**
- **Critical supplier resilience assessed**

---

12. Third-Party Risk Management

- **Hosting, HR, email under contract**
- **Data Processing Agreements in place**
- **Equivalent confidentiality and security obligations extended**
- **Supplier risk review process documented**

---

13. Data Protection & Privacy Controls

- **Data minimisation**
- **Purpose limitation**
- **Retention schedule enforced**
- **30-day licence update cycle for clients**
- **Secure deletion processes**
- **Privacy rights handling procedure**

---

14. Secure Development Lifecycle

- **Version control**
- **Peer review before deployment**
- **Test-before-release process**
- **Change approval workflow**

0330 128 9892
admin@oscar-research.co.uk

15. Physical Security

- **Secure premises**
- **Controlled datacentre access**
- **Lockable storage**
- **Screen locking enforced**

---

16. Training & Awareness

- **Data protection training on onboarding**
- **Annual refresher training**
- **HR compliance documentation maintained via Peninsula HR**

---

17. Artificial Intelligence Controls

- **AI used only for internal analysis support**
- **No autonomous decision-making**
- **No unsupervised modification of client data**
- **Human oversight required for all outputs**

---

18. Compliance & Enforcement

Non-compliance with this policy may result in disciplinary action. Security breaches will be investigated and corrective actions implemented. Policy adherence is monitored through periodic internal review.

---

19. Continuous Improvement

- **Annual policy review**
- **Risk assessment updates**
- **Roadmap includes Cyber Essentials Plus (2025)**

While Oscar Research Ltd is not currently ISO27001 certified, the controls implemented are aligned with ISO27001 Annex A principles and UK GDPR Article 32 requirements.