Severn Group

Data Breach Policy

FEBRUARY 2024

SEVERN
Superior Valve Engineering

Data Breach Policy

An IT security incident is an event that may adversely impact the confidentiality, integrity, or availability of an IT resource. Data security incidents are increasingly common occurrences whether these are caused through human or technical error or via malicious intent. As technology trends change and the volume of data and information created grows, there are more emerging ways by which data can be breached. Prompt detection and appropriate handling of these security incidents are necessary to protect information assets critical to Severn Group, preserve personal data privacy and confidentiality, and facilitate compliance with applicable laws and regulations.

Who does this Policy apply to?

This Policy applies to all employees, workers, contractors, agency workers, consultants, and directors and others employed or engaged by Severn Group.

Definitions

1. Security Incident

A security incident is a risk of a breach, but a loss or unauthorized access has not actually occurred. It is not always clear if an incident has resulted in a breach.

2. Security Breach

A security breach is any loss or unauthorized access to data that can at times include personal data.

What is the purpose of this Policy?

The purpose of this policy is to define requirements for reporting an IT security incident to minimize the negative impact on the confidentiality, integrity, and availability of Severn data and Severn systems.

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Reporting Actions

1. When any Severn employee becomes aware of a data incident or data containing personal information has been sent to the wrong person, they must inform.
   - Their line manager, local IT resource and data protection lead (if personal information is involved).
   - Failure to notify immediately can increase the risk of exposure and may result in disciplinary proceedings.

2. If personal information is involved, the data protection lead will notify the data protection officer.

3. Staff should seek advice before taking remedial action.

4. Local IT, Group IT and Data Protection Officer (if required) will carry out an initial assessment including time line, facts and scale, within 24 hours, and notify the Executive Team and offer recommendations.

5. Group IT Director will notify Bluewater IT Manager of the breach assessment and resolution approach.

Managing Actions

1. Containment and Recovery
   - The IT Team will determine the severity of incident, the data involved and whether the incident is still occurring.
   - If the incident is still occurring, the IT Team will determine what steps need to be taken immediately.
   - The IT Team will assess and implement appropriate steps to recover any data.

2. Assessment
   - What type of data is involved.
   - What events led to the incident.
   - How many people have been affected.
   - What are the consequences to those individuals.

3. Evaluation
   - The IT Team will conduct a full review of the cause and the response. Once the review is complete, a copy will be made available to the Executive Team.

Data Breach Policy

Agreement to follow this Policy

If you have any questions or concerns regarding this Policy you can contact Severn Group's Data Protection Officer (DPO) on dpo@severnvalve.com. The DPO is responsible for overseeing this Data Breach Policy.

This Policy will be kept under regular review. It does not override any applicable national data privacy protection laws and regulations in countries where Severn Group operates.

This Policy is fully supported by The Executive Committee. This Policy is non-contractual and may be amended at any time. This Policy should be read in conjunction with the Code of Conduct, Employee Data Protection Policy and the Employee Privacy Notice. All Severn Group Policies can be accessed on the Group Policy Hub.

At Severn Group, our business success flows from expertise – from technical knowledge and experience that position us as a leader in our field. Not everything, however, can be engineered. The Values which underpin that success stem instinctively from the culture we seek to sustain. Everything we do is tested against our Values, and our people are encouraged to apply them every day: they are the stewards of our brand, our reputation, our heritage, our ambitions.

Customer

Integrity

Excellence

Accountability

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