	ISDL No:	ISDL390	Version:	2.0	Class:	Open
	Title:	Statutory, Regulatory, and Contractual Requirements Policy				

# Access Intelligence Statutory, Regulatory and Contractual Requirements Policy

## 1.0 *Policy Objectives*

To ensure that Access Intelligence can operate a trusted, established Information Security Management System, it shall:

- Identify all requirements, whether legislative, regulatory, contractual or otherwise relevant to achieving the above and the lawful functioning of the business; and
- Maintain compliance with all applicable requirements for the duration (and thereafter, where required) of Access Intelligence’s operations.

## 2.0 *Policy Scope*


Access Intelligence Statutory, Regulatory and Contractual Requirements Policy shall include the following:

- This Policy shall apply to all employees, contractors and third-party users of Access Intelligence’s information systems, and other related infrastructure.
- All applicable laws, regulations and contractual requirements
- All information assets (data) owned by Access Intelligence
- All information assets (data) belonging to a client or a third party entrusted to Access Intelligence under an agreement which specifically details Access Intelligence’s responsibility for the security of that data
- The selection, implementation and effectiveness of controls used to manage statutory, regulatory and contractual compliance.

## 3.0 *Policy Statements*

The laws which apply to any given organisation are extensive. This is intensified by the UK’s evolving relationship with Europe and the general pace of socio-economical change (including technological advancement) which is continuously influencing the legal system of England and Wales. Although it is not practically possible to provide an exhaustive list of statutory requirements, Access Intelligence shall maintain compliance with the laws of England and Wales (including the European Union to the extent that such laws are binding and/or codified into UK legislative Acts of Parliament) including but not limited to:

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	ISDL No:	ISDL390	Version:	2.0	Class:	Open
	Title:	Statutory, Regulatory, and Contractual Requirements Policy				

## **General**

GDPR (both EU and UK equivalent)  
 Data Protection Act 2018  
 Privacy Electronic Communications Regulations (EU)  
 Freedom of Information Act 2000  
 Human Rights Act 1998  
 Limitation Act 1980  
 Malicious Communications Act 1988  
 Electronic Communications Act 2000  
 Electronic Identification Regulations 2016  
 Computer Misuse Act 1990 (as amended by the Police and Justice act 2006 and the Serious Crime Act 2015)  
 Communications Act 2003

## **Commercial**

Copyright, Designs and Patents Act  
 Trademarks Act 1994  
 Trade Secrets (Enforcement Etc.) Regulations 2018

## **Accounting and Finance**

Value Added Tax Act 1994  
 Corporation Tax Act 2010  
 Financial Reporting Codes and Guidance  
 Finance Act 2013  
 Finance Act 2014  
 Finance Act 2016  
 Finance Act 2017


## **Corporate**

Companies Act 2006  
 AIM Company Rules  
 Nominated Advisor Rules  
 London Stock Exchange Rules for member firms  
 Company Constitution (AoA)  
 FCA Regulations  
 City Code (takeovers and mergers)

## **Human Resources**

Employment Rights Act 1996  
 Employment Act 2002  
 Employment Act 2008  
 Employment Practices Code

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---	--------------------	------------	-------------

	ISDL No:	ISDL390	Version:	2.0	Class:	Open
	Title:	Statutory, Regulatory, and Contractual Requirements Policy				

Employment Relations Act 1999  
Employment Relations Act 2004  
Employment Rights Act 1996

Access Intelligence shall organise training for all employees, contractors and other personnel acting on its behalf, incorporating key legislative principles and regulatory rules that apply to the day to day functioning of the business.

Access Intelligence shall organise training for those of its employees and contractors whose responsibilities are dependent upon adherence to laws specific to a departmental function (i.e.: Legal, Finance, Human Resources etc.)

All training described in this Statutory, Regulatory and Contractual Requirements Policy shall be provided during the induction of new staff and, at a minimum, yearly thereafter.

Access Intelligence shall engage the assistance of 3<sup>rd</sup> party professionals to objectively evaluate and advise on Access Intelligence’s standard of compliance with statute, regulation and relevant contractual obligations.

As part of Access Intelligence’s annual review of all ISMS policies, Access Intelligence shall review its Information Security Management System to ensure that it’s policies and processes are aligned with all legislative, regulatory and contractual commitments.


Access Intelligence shall ensure that reasonable familiarity with applicable laws and regulations proportionate to the role being hired for (including verification of any professional certifications) is a pre-requisite to the recruitment of any employee.

Access Intelligence shall ensure that all information systems and security protocols initiated by the Access Intelligence Information Security Management System are regularly reviewed, audited and updated to remain in compliance with applicable law, regulation and contractual requirements.

Access Intelligence shall communicate all relevant legal, contractual and statutory requirements to all staff through internal policies and codes of conduct.

Access Intelligence shall comply with its contractual commitments by:

- Appropriate storage, record and accessibility of all contracts through CRM and other systems;
- Debriefing all employees and contractors of Access Intelligence’s contractual duties as applicable to specific roles through training;
- Ensuring all employment contracts contain obligations which sufficiently address confidentiality, intellectual property rights and data protection;

 <b>accessintelligence</b>	ISDL No:	ISDL390	Version:	2.0	Class:	Open
	Title:	Statutory, Regulatory, and Contractual Requirements Policy				

- Maintaining compliance with its ISMS and all associated policies as part of the Information Security Document Library.
- Ensuring that any third-party contractor who is delegated any contractual responsibility is subject to the same duties as Access Intelligence.

## 4.0 *Responsibilities*

Within Access Intelligence, all employees, contractors and third-party users shall understand their role in compliance with all legislative, regulatory and contractual requirements through the mechanisms set out in Section 3.0 above.

There are, however, additional responsibilities defined in order that the ISMS shall operate efficiently and in accordance with the requirements of statute, regulation and contractual obligations. These are as detailed in Section 4 of the Information Security Policy (**ISDL01**).

The Access Intelligence Legal Team shall be responsible for:

- Working with Department/Function Managers to identify and implement processes to align with applicable laws, regulations and contractual duties;
- Providing regular updates through the meetings described in the Access Intelligence Management Review Policy (**see ISDL09**) of new/emerging legislation and impact on Access Intelligence’s Information Security Management System;
- Assisting in the facilitation of all training;
- Reviewing/updating the Information Security Management System along with any internal contractual templates to ensure compliance; and
- Liaising with external legal professionals for the purposes of training, knowledge sharing and generalist advice on day to day business matters as well as company-wide projects.


All individuals specified within the Policy Scope of this Statutory, Regulatory and Contractual Requirements Policy (see section 2.0) shall have individual responsibility for complying with every aspect of this policy. The requirement to comply with Access Intelligence policies is included within the Terms and Conditions of Employment and is noted within each individual user’s job description. Any failure to adhere to the requirements of this policy shall result in disciplinary action being taken.

## 5.0 *Document Version Control*

This policy needs to be reviewed annually as an absolute minimum, or if required changes are identified to address one or more of the following:

- An identified shortcoming in the effectiveness of this policy, for example because of a reported information security incident, formal review or audit finding.

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---	-------------	-----	-------------

	ISDL No:	ISDL390	Version:	2.0	Class:	Open
	Title:	Statutory, Regulatory, and Contractual Requirements Policy				

- A change in business activities (e.g. mergers and acquisitions) which will or could possibly affect the current operation of the Access Intelligence Information Security Management System, and the relevance of this document.
- A change in the way in which Access Intelligence manages or operates its information assets and/or their supporting assets, which may affect the validity of this document.

The current version of this policy, together with its previous versions, shall be recorded below.

## Version History

Revision	Author	Date	Reason for issue
1.0	Lakhan Shah	13/02/2020	First issue to form part of ISMS mandatory document set in readiness for ISO 27001 accreditation
2.0	Lakhan Shah	18/01/2021	Updated to reflect change in data privacy practices.

## Approver(s)

Name	Role	Signature	Date
Mark Fautley	Chief Financial Officer		18/01/2021