



Ebbon

— GROUP —

Policy Name	Data Classification Policy
Version	1.0
Document Owner	vCISO
Document Classification	PUBLIC

Change Log

Version	Date	Authored By	Authorised By	Details
0.1	07/10/2024	Lauren Miller		Initial Draft of Policy
0.2	25/11/2024	Lauren Miller		Amendment to include customer and 3 rd party data and clarification and permissions regarding sharing internal and confidential data
0.3	01/12/2024	Lauren Miller		Example documents added and clarification on if document required to be shared when classified as confidential
1.0	04/12/2024	Lauren Miller	Steve Molyneux	Publish Policy

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1.0 Overview

Ebbon Group is required to ensure all our information assets are classified correctly. All employees across Ebbon Group are responsible for managing, handling, storing and classifying information correctly. This includes both internal & external (customer) data plus proprietary 3rd party data like DVLA, CAP, JATO etc.

2.0 Scope

This policy is applicable to all written information. Any documentation published by an Ebbon Group employee must be clearly labelled with one of the classifications listed below.

This ensures that all employees are aware of the classification and how it can be accessed, viewed, used and, if applicable, shared.

All customer data and proprietary 3rd party data is classified as Confidential.

3.0 Abbreviations/Definitions

3.1 Classifications

All Ebbon Group's Information Assets must be classified into one of the following categories:

- Public
- Internal
- Confidential
- Restricted

Note – any quotation, draft contract or potential sales literature sent to a customer shall be marked as “Commercial in Confidence” (meaning information has restrictions on further sharing by the customer i.e. they require permission prior to sharing the information and are not authorised to share the information with any third parties).

4.0 Roles and Responsibilities

The Compliance team maintains the [Ebbon Group Document Library \[internal document\]](#) which is available to all Ebbon Group employees. The library provides links into the most recent version of the published document, the classification that has been applied to the document, and the document owner.

Each published document has a document owner. Policy owners can only be Managing Directors, CEO's or the vCISO. Procedure owners are likely to be a team lead or department head. The author of a document may be any employee.

5.0 Classification Definitions

5.1 Public

Information with a public classification applied is not subject to any controls.

This information can be shared on websites and with potential and existing customers as required.

This is applicable to all Ebbon Group Policies (these documents are being reclassified and republished as required during annual document reviews throughout 2025) and any document that has been stored within the [Customer Information Pack](#) area.

All public classified documents have a document owner who is responsible for ensuring the document is reviewed, updated and republished as required.

An example of a Public classified document could be this Data Classification Policy.



5.2 Internal

Documents classified as internal are applicable to company wide information that is available to all employees.

If disclosed, this could have a minimal impact to the Group and/or brand/reputation.

Each internal document will have an owner who is responsible for authorising or declining any requests to share information outside of the definition above (i.e. to share an internal document with a customer or partner).

Any Internally classified data authorised to be shared externally will not be reclassified, however, the recipient will be expected to comply with the Commercial in Confidence restrictions, and additional restrictions added by the document owner which must be communicated with the intended recipient (i.e. within an email). The authorised information can only be shared via a password protected email and the password shall be sent separately via text message or additional email.

The document owner will also be responsible for ensuring the document is reviewed, updated and republished as required – minimum once per calendar year.

Most IT related documents are classified as Internal.

5.3 Confidential

Documents classified as Confidential are applicable where access is limited/granted to employees where the information is applicable to their job role.

Access is based on team/role requirement and information shall remain within the Group and not shared externally OR to those not authorised internally. Each document has a nominated document owner allocated.

If disclosed, this could have an impact to the Group and/or brand/reputation.

All customer data and proprietary 3rd party data is classified as Confidential.

In the unlikely event, a request is made to share Confidentially classified data outside of the definition above, the document owner will review the request and authorise or decline as required. Any Confidentially classified data authorised to be shared externally will not be reclassified, however, the recipient will be expected to comply with the Commercial in Confidence restrictions, and additional restrictions added by the document owner which must be communicated with the intended recipient (i.e. within an email).

The authorised information can only be shared via a password protected email and the password shall be sent separately via text message or additional email.

The document owner will also be responsible for ensuring the document is reviewed, updated and republished as required – minimum once per calendar year.

5.4 Restricted

Documents with a Restricted classification contains highly sensitive information that shall not be shared outside of Ebbon Group.

If disclosed, there could be a significant impact to the Group and/or brand/reputation. Data Leakage Prevention (DLP) rules implemented across Ebbon, includes preventing information classified as Restricted from being shared externally.

Restricted documents have very limited access and likely to be only accessible by the Senior Management Team or as applicable to team/role requirement.

An example of a confidentially classified document could be: Authenticated Pen Test

6.0 Summary

All published documentation is required to be classified, and the classification will be applied to each page of the document (in the footer).



Watermarks are not to be used on any new published documentation from October 2024 onwards.
Existing documents will have watermarks removed as part of the annual review process throughout 2025.
Document classifications will be applied to footers instead

Any published documentation that does not have a classification or has an incorrect classification, will be sent to the document owner when identified, to request a classification is applied and the document republished.

All published documentation is required to be reviewed minimum annually (some documents are reviewed more frequently), be version controlled and added to the [Ebbon Group Document Library](#)

End of Document