



CYBERFORT

# SafeToNet

## Privacy Review & Certificate of Assurance

23<sup>rd</sup> April 2020

# Exec Summary

Following an extensive review by our Cybersecurity and Data Protection Consultant, we are pleased to state that SafeToNet has been able to demonstrate a high level of compliance with EUGDPR and all related Data Regulations in the UK and Europe.

It achieved 98% compliance overall and 100% on those conditions relevant to SafeToNet and its business. There are no follow-up recommendations.

## Consultant Commentary & Summary

*"Having reviewed SafeToNet's software platform for compliance with the General Data Protection Regulation (GDPR) and best practice Cybersecurity principals, it is of my opinion that SafeToNet's platform fulfils its obligations to protect personal data (as defined by the GDPR (Article 4(1))).*

*The platform has been developed with Privacy by Design (Article 25) principles in mind, and therefore is not only a secure platform, it also protects the rights and freedoms of data subjects by ensuring data is anonymised and is not tracked, traced, shared or processed in a manner which would be in conflict of the data subjects best interests.*

*It is rare to find a platform where such care has been taken to protect the rights and freedoms of their primary target audience, but it is clear from reviewing the technology, operating practices, and processing methodology that every step has been taken to protect the personal data of those using the system.*

*I, therefore, declare that this platform is secure and aligns fully with international standards for information security and privacy (ISO27001 & ISO27701), the GDPR and all associated Data Protection Regulations within the UK."*

# About the Auditor

The audit was conducted by **Gary Hibberd, of Cyberfort**. Gary has 35 years experience in IT, and 20 of these spent as a Data Protection Officer and Cyber Security specialist. He holds certifications as a Certified Information Security Systems Professional (CISSP), Certified Information Security Manager (CISM) and Certified Information Security Auditor (CISA). He also holds certification in 'Essential General Data Protection Regulation' (E-GDPR).

Gary is a Director, but also active consultant in the field of the GDPR and Information Governance frameworks, ISO27001, ISO27701, ISO22301 and SOC2.

Prior to joining Cyberfort, Gary was the Managing Director and Consultant for Agenci Information Security Services for 10 years. In both his role within Agenci and Cyberfort Gary has helped over 100 organisations achieve full certification against the international standards for Information Security (ISO27001) and Business Continuity Management (ISO22301). He has assisted a large number of organisations develop Compliance programmes, which demonstrate their compliance to regulatory frameworks such as the General Data Protection Regulation (GDPR) and the Data Protection Act 1998 – 2018.

He is a board member of the Resilience Association, and the Yorkshire Cyber Security Cluster. He is also on the Committee for the development of the British Standard for Organisational Resilience (BS65000), with the aim to develop this into an international standard.

He is an Executive in Residence at Sheffield Hallam University where he lectures on Cybersecurity, Data Protection and Information Security Governance frameworks.

Gary is an award winning Business Continuity Management Consultant, author, and international speaker on topics including Business Continuity, Cybercrime, the Dark Web, Information Governance, and Data Protection.

# Audit Methodology

The audit undertaken on SafeToNet was carried out over four days.

It was an evidence based audit, focusing on the capabilities of SafeToNet to actively demonstrate that appropriate organisational and technical measures are in place to protect personal data (GDPR: Article 32).

This was both interview and evidence based, where key members of the senior management and development team were required to answer questions and provide documented evidence of compliance to both ISO27001 and ISO27701.

Documented evidence was reviewed prior, and during the interviews to establish the legal basis for processing, and the controls surrounding it. In brief this encompassed a review of people, policies, procedures, processes, systems, and third parties.

Using both ISO technical standards allowed the auditor to gain clarity and evidence surrounding the control and processing of data in a structured and evidential manner.

The full record of the audit is classified as company confidential, however further discussions and evidence of compliance are welcomed and can be accommodated by the auditor.

## **ISO27001:2017**

The international standard for Information Security Management Systems (ISMS). It provides assurances through 114 controls that appropriate technical and organisational measures are in place to protect information.

## **ISO27701:2019**

This is the extension to ISO27001 and ISO27002 for Privacy Information Management Systems (PIMS), and builds on the 114 controls of ISO27001, to build evidence that the GDPR principles (Article 5) have been satisfied.

When combined these provide evidence of compliance to the GDPR (Article 5 & 40).

# Certificate of Assurance

This is to certify that on **23rd April 2020**, SafeToNet successfully completed their Safety and Privacy security review.



Having been externally assessed by a duly qualified and expert security assessor from Cyberfort Group.

The results of the assessment are;

That as of the date on this certificate, SafeToNet cloud based platform has been assessed against the international standards for security (ISO27001:2017) and Privacy (ISO27701:2019). The certificate of assurance provides HIGH assurance of technical and organisational security taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing to protect the rights and freedoms of data subjects (as required by the General Data Protection Regulation (EU) 2016/679 (GDPR).

For and on behalf of Cyberfort.

A handwritten signature in white ink, appearing to read "G. Hibberd".

Mr Gary Hibberd  
Professor of Communicating Cyber.