IRIS Accountancy Suite

Information Security Assurance Statement

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Contents

Information security assurance statement

Objective of this document

The purpose of this information security assurance statement is to provide customers of IRIS Accountancy Suite with transparency as to the security and personal data compliance of this product from all threats, whether internal or external, deliberate, or accidental. Also, this document aims to ensure legal compliance, business continuity, minimise business damage and maximise client confidence in IRIS Accountancy Suite as a thoroughly

secure software and service provider. For the benefit of this document, IRIS Accountancy Suite comprises:

- Practice Management
- Personal Tax
- Business Tax (Partnership and Corporate)
- Trust Tax
- Accounts Production
- Company Secretarial
- Company Formations
- P11D
- VAT Filer
- Staff Planning
- Time
- Fees
- Automail
- Practice Dashboards

Description of the data processing carried out by IRIS Accountancy Suite

- IRIS Accountancy Suite is designed to assist Accountants and Tax Advisors to run their practice and service their clients by providing compliance solutions for the completion and submission of Tax returns, Statutory Accounts, P11D returns and company administration documents.
- IRIS Accountancy Suite is a desktop solution, which is hosted on the customer's own hardware, in which case data is owned and processed by the customer. The software and data can be hosted either on the IRIS Hosting platform or via any other hosting provider, in which case the data is stored and processed in that specific hosting location.
- IRIS Accountancy Suite holds data sufficient for the processing of efficient practice administration and compliance and company administration services offered to the client.
- Types of personal data include name, address, email address and information relating to sole trades and partnerships.
- Data processed is that of clients of accountants and tax advisors. In the case of P11D, the data processed is that of employees of the client. IRIS Accountancy Suite also processes some data in relation to the customer (accountant or tax advisor) and their staff.
- Various processes within IRIS Accountancy Suite provide methods of communication with Companies House and HMRC. All processes are as per Companies House and HMRC technical specifications they provide to software vendors. More detail about the connections to HMRC and Companies House can be read in the Appendix.
- IRIS Accountancy Suite links with third party software to download customer and accounting information. More detail about the connections to third party software can be read in the Appendix.

Statistical Data Collection for IRIS Accountancy Suite

IRIS uses data collected from IRIS Accountancy Suite. Two types of data are collected:

- Computer and environment data

The data is collected as part of the service IRIS provides, to understand product usage and to guide product decision making and planning. This helps us to better understand the environments our customers use our software in and to understand the extent to which our software is utilised.

- Usage statistics

Data collected includes licence limits and product usage e.g. total counts of clients, in some cases broken down by chart or business types as appropriate. Summarised data is transferred between computers in an encrypted form and the data is located in the UK. The data is collected to understand product usage and to guide product decision making and planning. This helps us to better understand the extent to

which our software is utilised.

Statement of assurance

IRIS Accountancy Suite will ensure that:

1. We will put in place measures to protect customer information from a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed.
2. We will meet our regulatory and legislative requirements (note 5).
3. We will produce, maintain, and test Business continuity plans (note 6).
4. We will provide information security training to all our staff.
5. We will report and investigate information incidents (whether actual or suspected), in line with our Incident reporting procedure.
6. We will monitor compliance with our Information Security Policy.

IRIS ensures that all employees comply with corporate standards and procedures. These include incident handling, information backup, system access, virus controls, passwords-authentication, communication, and encryption. These policies are communicated to all employees via the company compliance portal and intranet.

IRIS Accountancy Suite Organisational Security

IRIS Accountancy Suite is part of the IRIS Software Group.

Organisational security at IRIS Group level

Data protection and information security at IRIS Software Group is controlled by the *IRIS Information Security and Governance Forum*. This forum meets at least quarterly and includes:

- Members of the Executive Committee
- The Chief information Officer (CIO)
- IRIS Group IT Director
- IRIS Group Data Protection Officer
- Other key security leads within the company

The Information Security and Governance Forum approves IRIS Group level policies relating to information security and data protection, which IRIS products must comply with. There are three Group policies and a detailed Information Security Management System (ISMS). The three Group level policies are:

- IRIS Group Data Protection Policy – this sets out the roles and responsibilities for data protection compliance within the IRIS Group. It also sets out the requirement for risk assessment and data protection assessment for all projects and proposals that will change or impact on the handling or use of personal data.

- Information Security and Acceptable Use Policy Summary – this sets out the basic information security and acceptable use standards that all staff within the IRIS Group are required to adhere to.

- IRIS Personal data incident reporting and investigation procedure – this indicates the reporting and investigation procedure for all security incidents that become known or are reported to anyone within the IRIS Software Group.

The above policies are communicated to all staff and relevant external staff within the IRIS Group at least annually, using a dedicated training and policy management platform. Managers responsible for

delivering IRIS products and services are required to ensure local arrangements are in place to comply with those policies and to evidence this.

- IRIS ISMS – This is the default security system for IRIS Software Group. All IRIS products must meet or be working towards meeting the standards of the IRIS ISMS except for those which already have their own certification under ISO27001 or any other standard relating to information security and data protection.

Organisational security for IRIS Accountancy Suite

At IRIS Accountancy Suite, the product manager is the single point of contact for routine security and data protection enquiries. They work with the managers involved in delivering IRIS Accountancy Suite to ensure IRIS Accountancy Suite complies with the IRIS Group policies and ISMS or any other information security standard – as well as any other regulatory requirements relevant to the service.

For IRIS Accountancy Suite, the team with responsibility for ensuring your data remains secure and in compliance with IRIS Group Policies and ISMS are:

- IRIS Accountancy Suite Product Manager – Corbyn Turner
- IRIS Accountancy Suite Product Manager – Sean Deverell
- IRIS Accountancy Suite Product Manager – Nick Lloyd
- IRIS Accountancy Suite Product Manager – Ben Webb
- IRIS Accountancy Suite Product Owner – Abi Gill
- IRIS Accountancy Suite Product Owner – Satinder Dhanda
- IRIS Accountancy Suite Product Owner – Jay Kamineni
- IRIS Accountancy Suite Product Owner – Wendy Ilsley
- IRIS Accountancy Suite Development Manager –David Robinson
- IRIS Accountancy Suite Development Manager – Roland Givan
- IRIS Accountancy Suite Development Manager – Alex Bennett
- IRIS Accountancy Suite Support Manager – Robert Cantwell

The IRIS Accountancy Suite team keep your data secure by ensuring that appropriate measures are implemented to protect your data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to your data while being stored, transmitted, or otherwise processed by or on behalf of IRIS Accountancy Suite.

Measures are “appropriate” if they have been identified through risk assessment.
Date of last IRIS Accountancy Suite risk assessment review: measured on a bi-weekly basis.

The IRIS Accountancy Suite team will ensure adequate records are created and maintained to support compliance verification and inspections and incident response (subject to any limitations set out in our Terms and Conditions).

The IRIS Group Data Protection officer is responsible for providing advice and guidance to the IRIS Accountancy Suite team and for monitoring our compliance on all security policies and related issues. The IRIS Group Data Protection Officer is also the designated contact for the Information Commissioner’s Office.

Group operations are responsible for the operation and integrity of IRIS Accountancy Suite’s IT systems and for keeping systems reasonably up to date.

IRIS Accountancy Suite’s Development systems are managed by the local development team based in the UK with support from India. Offshore Devs have access to scrambled data only.

Asset register: IRIS Group IT records and maintains a register of all assets, relevant to IRIS Accountancy Suite Accountants' Suite (including acquired software licences) in a fixed assets system.

Client defined classifications: Client information and materials processed, stored, or transmitted by IRIS Accountancy Suite shall be handled strictly in line with the customer's prior advised classification policies and standards, subject only to legal compliance.

IRIS Accountancy Suite human resource security

IRIS Accountancy Suite staff will have access to your data in the following circumstances:

Support

- Support can, at your invitation, remote-connect to machines to help with the resolution of issues. Providing access to all Accountants' Suite data
- Backup copies of files may be requested to help with further investigation of issues.

Engineering

- Data files may be accessed by engineering to help with further investigation of any large issues.

Sales & Marketing

- Some personal data may be collected and recorded for the administration of licensing and billing.

The following measures are in place to protect your data:

Prior to employment

- Staff and contractors are subject to background checks and verifiable references to ensure suitability for any given job role.
- All staff are required to accept our Group Data Protection Policy, Incident Reporting Procedure, and Information Security & Acceptable Use Policy.

During employment

- IRIS Accountancy Suite managers are made aware of their responsibilities to ensure that established policies and procedures are adhered to by external parties, contractors, and employees through use of internal audited KnowBe4 training.
- IRIS Accountancy Suite employees, third parties and contractors receive appropriate awareness training and regular updates in organisational policies and procedures as relevant for their job function. Corporate policies and training are administered via KnowBe4.
- A formal and communicated disciplinary process is implemented to handle IRIS Accountancy Suite employees who have committed a security breach.

Termination and change of employment

- Upon instruction from HR of a person leaving IRIS, that person's access to confidential areas shall be restricted immediately, culminating in:
    - full removal of access to any part of the corporate network prior to departure,
    - all corporate assets in that person's possession having been returned and or been collected by the relevant Department manager or the Information asset Owner as appropriate.
    - In the event of a person transferring from one department to another within IRIS Software Group that person's access will be varied accordingly.

IRIS Accountancy Suite Access Control

User Access Control

- Access to IRIS Accountancy Suite is setup and controlled by the 'Master User'. These Admin users are able access user settings and create user roles with appropriate levels of access rights. Passwords can be added; these are managed by individual users at user level. Access may be revoked at any time by Admin users.
- The software hosts built in guides and instructions to assist customers in the management of user roles and access rights.
- IRIS Accountancy Suite has a built in Administrator role (Master User). The Administrator has access to all areas of IRIS Accountancy Suite, including settings and controls. It is the customer's responsibility to ensure administrator roles are adequately protected.
- It is the customer's responsibility to enforce password policy through their own internal staff policies.
- IRIS Accountancy Suite support staff can assist with changes to permissions. Passwords are encrypted; support staff can assist with the removal of passwords and will only act on the instructions of the customer.

Internal System Access Control

IRIS Accountancy Suite developers have access to internal development systems and data. Onshore and Offshore Devs have access to scrambled data but can request audited access to customer data.

Operations staff have access to production databases. All are accessed through windows authentication (linked to movers / leavers process) unless otherwise stated.

- Access to source code is managed via internal code repositories with these accounts and the above request process, all code is peer reviewed.
- Deployment of code is automated through an approved and gated process to negate the need for
- IRIS Accountancy Suite developers to have any access to the production systems.
- Access to any environments with customer data is additionally controlled through use of VPNs and IP restrictions.

For the avoidance of doubt, IRIS Accountancy Suite warrants to Clients that it will not seek to circumvent, compromise, or change the Client's security controls, and IRIS Accountancy Suite will not change the Client's software configurations (without proper authorisation); and no 'back door' password or other method of remote access into IRIS Accountancy Suite's software shall exist.

Encryption (cryptology)

IRIS Accountancy Suite enforces the TLS 1.2 protocol on connections to integrated applications and external services.

IRIS Accountancy Suite physical and environmental security

All customer data is held on local customer servers (unless hosted by IRIS, in which case please see the IRIS Hosting Assurance Statement). Customer data captured for support is password protected and held on IRIS servers, with all users required to fulfil 2-factor authentication for access.

Equipment

All IT equipment has an enforce lock policy, where passwords are managed by multi-factor authentication.

All IT equipment shall be properly maintained, and any disposals of equipment or media handling devices shall be in strict accordance with WEEE recycling standards and be fully certificated by Safe PC Disposal (SPD). Destruction of confidential information (in paper form) shall be affected and certificated by Shred IT. Safe PC Disposal (SPD) Shred IT) are ISO 9001 and ISO 14001 accredited.

Media handling

Portable physical media is not needed by IRIS Accountancy Suite engineers.

In the event of being used in the future, IRIS staff may only use prior authorised removable media supplied by Group IT. Such media will typically comprise encrypted external drives and memory sticks, all of which are password protected and their use duly monitored Security software. Individual Client security requirements may from time to time necessitate specific authorisations being prior arranged with Group IT.

IRIS Accountancy Suite Operations security

Change management - Change management controls have been implemented to ensure satisfactory control of all changes. Major architectural changes are reviewed by an architecture review board (ARB) to discuss security, service level and complexity issues.

Capacity management – Use of resources are monitored, tuned and protections made of future capacity requirements to ensure systems continue to perform at optimum levels.

Separation of development, testing and operational environments – development and production environments are separated and managed through documented and automated deployment pipelines. Access to infrastructure is restricted through IP restriction lists. IRIS Accountancy Suite developers do not have access to production environments.

Protection from malware – IRIS Information Services are responsible for protecting IRIS Accountancy Suite developer machines to protect against malicious software and this is centrally monitored using central processes. Screening tools are used to provide comprehensive email filtering (not only to preclude spam but also to scan attachments more effectively to counteract viruses and other malware). Protection of production environments is maintained by Rackspace.

Back-ups: Back-ups are required at a local server level.

Event logging - Systems are configured for recording user activities, exceptions, faults, and information security events. Resulting audits are held on local customer servers.

Control of operational software – Installation of software on IRIS Accountancy Suite production systems is managed through package managers to minimise the risk of corruption of operational systems.

Management of technical vulnerabilities – Penetration testing for integrated web-applications is planned annually to be undertaken by a third party. Security is considered during backlog refinement and discussed as part of the overall product backlog and workload. Any changes which have security implicants are reviewed by the Architecture Review Board.

Restrictions on software installations – Installation updates are distributed by auto-update or via the IRIS website. Customers apply releases to their locally saved application.

IRIS Accountancy Suite Communications security

Network security – All integrated web-applications are maintained and tested to a high standard of security. The integrity of customer data is entirely down to the security of the server in which the IRIS Accountancy Suite application is based (this could include hosted environments)

Electronic messaging – IRIS employees are subject to audited training on appropriate use of electronic communication, particularly with sensitive and/or personal information. In cases where customer information needs to be shared for fault finding purposes (such as support / develop liaison), these are controlled through restricted access CRM systems requiring multi factor authentication.

Confidentiality or non-disclosure agreements - As required, IRIS Accountancy Suite uses NDAs and maintains signed agreements to protect confidentiality. The requirements for confidentiality or non-disclosure are identified, reviewed, documented regularly by IRIS, and communicated through training plans.

System acquisition, development, and maintenance

Information security requirements analysis and specification - Information security requirements are considered during backlog refinement by the team. Any significant security implications will be taken to an architectural review board (ARB) with an enterprise architect and a security architect to sign off.

Securing application services on public networks – Where possible, integrated web-applications enforce the use of TLS 1.2 as a communication protocol.

Security in development and support processes

System change control procedures – Major system changes are reviewed by the Architectural Review Board (ARB) mentioned previously in this document.

Technical review of applications after operating platform changes – IRIS test all product updates against a range of supported environments and software. Regression testing is completed to review the overall product impact of any system changes.

Restrictions on changes to software packages –Changes to software development inhouse is subject to change control procedures.

Secure system engineering principles - Principles for engineering secure systems have been established, documented, and maintained by the IRIS architecture team and are used as part of an internal training plan for all developers (Architecture Corpus).

System testing – All system and application changes are subject to an appropriate combination of manual, automated and regression testing comprised of testing suites managed by the internal quality engineers on the IRIS Accountancy Suite team. All features are tested before being accepted through a series of environments before they enter the production environment.

Secure development environment - The organisation has appropriately assessed the risks associated with individual system development and integration efforts that cover the entire system development lifecycle. Development environments are assessed for suitability and security by the Architectural Review Board.

Test data

Protection of test data - Copies of production databases are not used, and live production data is not used for testing purposes. Development, QA, and staging environments have a series of stock / dummy data and manually entered data of fictitious companies and employees for the use of testing.

Supplier relationships

Information security in supplier relationships

Development, bug fixing and enhancements to the IRIS Accountancy Suite product are sometimes carried out by a team in Cybage. All Cybage employees have the same checks and follow the same compliance procedures as FTE employees. Any customer data shared with Cybage for purpose of bug fixing is scrambled unless specific authorisation from the customer is attained first.

Supplier service delivery management

Managing changes to supplier services –If a new supplier needs to be selected for any reason, IRIS follows a Supplier due diligence process which assesses any potential supplier data protection and security arrangements.

Information security incident management

Management of information security incidents and improvements

In all instances, any IRIS Accountancy Suite critical incidents (whether relating to information security or not) are managed through the "Critical Incident Management Process", handled, and coordinated by the IRIS Critical Incident Manager. Incidents are prioritised and classified as part of this process. The process outlines stakeholder communication with a focus on customer communication during an incident resolution. A post incident review is then drawn up by the software manager and / or product manager and corrective actions are logged and tracked to execution.

Information security incidents must follow this process, but in addition will be triaged by the Group Data Protection Officer. The IRIS Group Data Protection Officer will report a summary of all data protection incidents to the IRIS Information & Security Governance Group and maintain a list of learning outcomes and actions arising from incidents with the aim of ensuring Information Asset Owners follow through on those actions. This process will also be used internally for any issues discovered during development, and training is provided for staff to promote awareness of this process.

Business continuity – Information security aspects

Information security continuity

No business-critical data is held on IRIS servers for IRIS Accountancy Suite applications. See appropriate documentation for our hosted service.

For application updates including legislation changes, code configuration is controlled within version control. In the highly unlikely event of disaster recovery being required, environments can be created through recreating replicable stored environments.

Data Protection – quick reference

IRIS Group Data Protection Officer – *Vincenzo Ardilio* - dataprotection@iris.co.uk

Data protection owner for IRIS Accountancy Suite – *Jenny Strudwick – jenny.strudwick@iris.co.uk*

Location of personal data processing

All customer data is held on local customer machines. For any customer data collected by support or engineering, it is held in the UK.

Retention of data

We will retain records of our dealings with our customers in line with our legal and taxation record-keeping obligations, such as details of invoices and payment details. The information we retain is reviewed regularly in line with our retention policies and removed at the earliest opportunity.

Data subject rights

Customers have a right to access personal data held by IRIS. Customers should direct their request to access data to the Support desk.

Right to Accuracy, Rectification and Erasure (Right to be Forgotten)

Data protection law imposes obligations on users to ensure the accuracy of the personal data that is processed, and it must be kept up to date where necessary.

Data Accuracy

IRIS Accountancy Suite allows the self-service of data accuracy.

- A single client record for each client within IRIS Accountancy Suite eliminates the need to duplicate data entry and improves data accuracy.
- IRIS Accountancy Suite is enhanced throughout the year to ensure that the legislative compliance and validation rules are up to date.
- Online filing validation is carried out within IRIS Accountancy Suite before submission to Companies House / HMRC, reducing the risk of the Accounts / Tax Return being rejected.
- Pre-population of client data made available via Making Tax Digital (MTD) can be imported directly into the return.
- Data can be rectified and resubmitted to Companies House and HMRC (within the limits of what is defined / regulated by Companies House and HMRC). To rectify information with either government body, it is recommended you consult with them on their processes around rectification of any data submitted and accepted by them.

Data Deletion

IRIS Accountancy Suite allows the self-service of data deletion.

- User profiles
- Customers
- Data within a customer (accounts, tax returns, tax notes)

Appendix

Communications with HMRC and Companies House

Sending and receiving Accounts and Forms data with Companies House

All accounts and forms communications with Companies House are sent as an XML file submitted to the Companies House online gateway account.

Data transmitted between IRIS Accountancy Suite and Companies House is encrypted using HTTPS protocol.

Accounts

The data transmitted includes all the data appearing in the accounts along with hidden tags and codes that identify the data for analysis by computer software. Accounts are transmitted directly to Companies House via secure HTTPS.

Account files (PDF or IXBRL) manually saved on your computer are not encrypted and you should take steps to ensure that such files are kept secure while on your computer or device.

The information submitted is as required by Company Law and in accordance with various other accounting and/or auditing legislation governing the various entity types. The data and preview is added to the Companies House register and is freely available to searchers of the public record.

Companies House Responses

The status of e-filing submissions to Companies House can be queried based on the individual submissions for accounts and forms. IRIS Accountancy Suite will poll Companies House for status updates on the submission of those accounts and where an updated status is available will update accounts within IRIS Accountancy Suite.

The data transmitted includes status requests based on e-filing submission number or presenter reference and the responses will include a status reference for pending/accepted/rejected etc. The requests and responses are transmitted directly to Companies House using secure HTTPS and the responses stored directly into your own customer database.

Sending and receiving data requests with Companies House

Data requests made using IRIS Accountancy Suite (e.g. when creating a new client) are made directly to Companies House using the Company Registration Number. The data returned is in JSON format and includes

business and personal information on the public register such as names, addresses, dates of birth, nationality, and country of residence etc. As a requirement of HMRC fraud prevention policy, we collect additional information about the user's system, store this temporarily on our servers and pass this on to HMRC with each submission. This data includes information about the user's browser, browser settings, browser plugins, IP address(es), TCP ports, computer screens, time zone. The data collected may be added to in future by government mandate. Information is transmitted and received directly with Companies House using secure HTTPS. Requests are sent directly to Companies House at http://data.companieshouse.gov.uk.

HMRC Communications:

Various processes within IRIS Accountancy Suite provide methods of communication with HMRC. All processes are as per HMRC technical specifications and schemas they provide to software vendors. More information from HMRC is available here.

HMRC have a Personal Information Charter and a Privacy Policy which contains useful information about their current privacy policies.

Sending and receiving data with HMRC: HMRC tax return submissions and responses

All tax communications with HMRC are as an XML file submitted to the HMRC online gateway.

The XML transmitted between IRIS Accountancy Suite and HMRC is encrypted using the TLS 1.2 protocol and the agent password is encrypted using the MD5 algorithm. The tax return submissions are sent directly to the HMRC Transaction Engine via secure HTTPS and the corresponding response is received in the same way.

Within IRIS Accountancy Suite the CT600 return submission can be generated along with the iXBRL (Inline eXtensible Business Reporting Language) accounts and computation. The iXBRL instance is Base64 encoding and placed inside the tag in the CT600 XML instance.

The XML file is a formatted representation of the tax return and may include personal details such as loans to directors. Other sensitive information may include bank details and names and addresses for repayments.

Similarly, the SA100, SA800 and SA900 return submissions can be generated by users and is also submitted as XML to HMRC. As before, the XML file is a formatted representation of the tax return and may include personal details such as names and addresses of related people such as partners. Other personal information may include appointment and termination dates for partnerships, employment details, bank details and names and addresses for repayments.

If a user requires a copy of the XML submission, the file can be downloaded to the user's local computer. This file is unencrypted XML and should be kept safe and secure after downloading.

When a tax return is submitted online, a copy of the response message sent by the HMRC online gateway is received in the application. The response XML is stored in the customer's database. The information submitted is required, by law, to make a return of the taxable income and capital gains, and any other documents requested by HMRC.

Sending and receiving data with HMRC: HMRC Pre-population requests and responses

HMRC uses APIs (Application Programme Interfaces) to obtain information relevant to the completion of a tax return. IRIS Accountancy Suite uses these APIs to request information held by HMRC and pulls this data directly into the tax return.

a) Authorise IRIS Accountancy Suite to communicate with HMRC

Within IRIS Accountancy Suite the user is required to log into an HMRC webpage with agent codes (plus identity verification) and this creates an authorisation token (OAuth 2.0). The OAuth 2.0 (open standard) allows the user to grant authority to IRIS Accountancy Suite to interact with HMRC on their behalf without sharing their access credentials. The user authenticates directly with HMRC using their Government Gateway account, and grants authority for specific scopes. Once authenticated the user will not be asked to enter the codes again (at least for another 18 months when HMRC will expire the token and ask you to go through that process again).

b) Collect data from HMRC

IRIS Accountancy Suite will connect to HMRC and retrieve data on the selected client. The data that is retrieved from HMRC is stored in the customer database and displayed to the user.

Software interactions

Name	Description	
KashFlow	Accounts data import. Username and password encrypted and stored in the customer's database.	KashFlow
Quickbooks	Accounts data - no personal data pushed. Integration authorisation managed in QuickBooks. Authorisation token is stored in the client's database.	Quickbooks
FreeAgent	Accounts data - pull only	FreeAgent
Xero	Accounts data - pull only. Integration authorisation managed in Xero. The authorisation token is stored in the customer's database.	Xero
IRIS OpenSpace	Document sharing and approval.	IRIS OpenSpace
HMRC	Target for submissions	HMRC privacy policy HMRC personal information charter
Companies House	Target for submissions, Source for public personal data	Companies House