



## Understanding and Managing Information

Practical Confidentiality and information security  
in a small but global technology business



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- SynGro background
- Introduction and context SynGro Perspective
  - The need for confidentiality
  - Barriers and threats to confidentiality
- Considerations
  - Legislative
  - Company
  - Individual
- Confidentiality Process
  - Risk assessment
  - Policies and Controls
- More on contracts
- Summary

SynGro was founded to capitalise on the emerging market of customer feedback management. We have evolved to become one of the **recognised leaders** in the Voice of the Customer market and are **founding members** of the Global Customer Experience Professionals Association (**CXPA**).

We are focused on the enterprise sector of the Voice of the Customer market where our **skills** in **integrating insight information with client data** such as financials and CRM have been paramount to our success.

We enable our clients to collect customer insight in more than **74 countries** and **30 languages**.

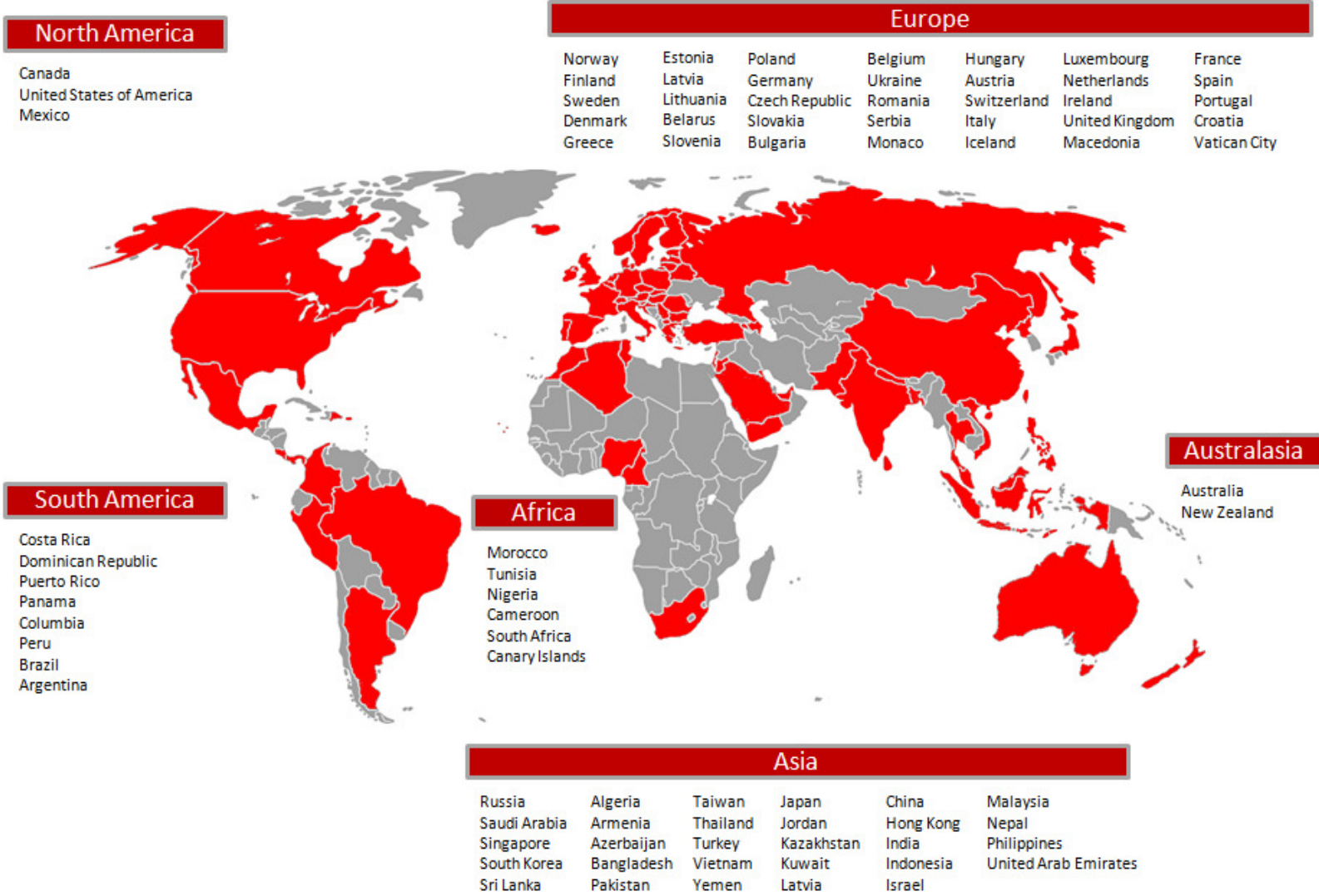
Our key clients include Global enterprises such as **Stora Enso**, **AutoKumpu**, **Heineken** and a large **telecommunications company**.

We have perfected a four stage process which enables clients to transform their business and embody a customer centric culture.

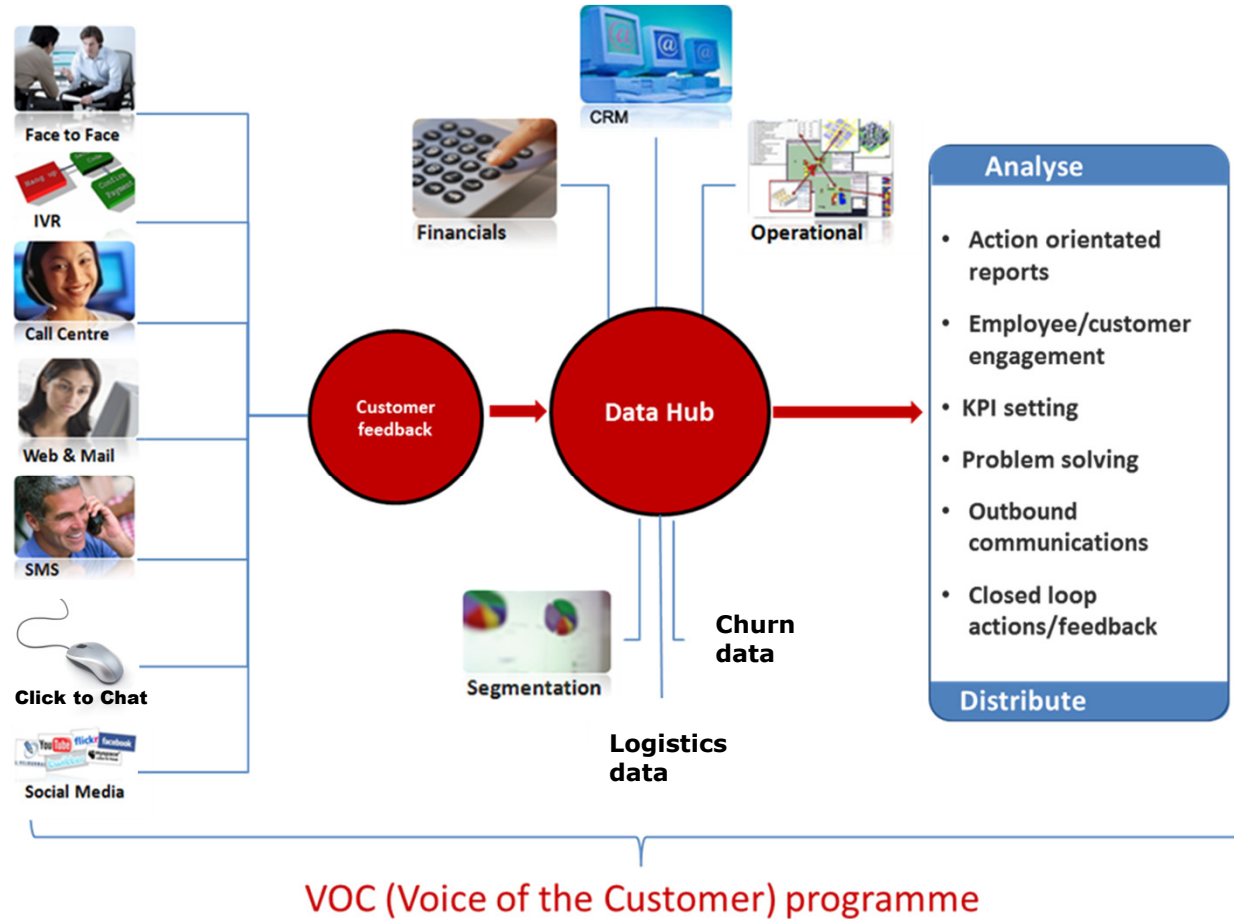
*“A new era of customer relationships, in which customers are ‘the new employees’ and have a voice that needs to be listened to, respected and acted upon, will be unavoidable for the vast majority of organizations over the coming decade. VoC-focused technologies will become critical investment areas for many organizations during the next five years.”*

*Gartner*

We supply and support our clients in all of these countries



SynGro has technology solutions to collect large volumes of multi-channel feedback for analysis and distribution



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# The need for confidentiality is?

## Company concerns

Loss of intellectual property leading to a loss of commercial opportunity

Legal action and penalties following a breach of contract or legislative requirements

Ignorance of the difference between domestic and foreign requirements is no defence

## Client concerns

Protection of client information we hold in our application

Protection of client information we receive in our email and store on our network and computers

Protection against unauthorised persons accessing client data by breaching office networks (locally or remotely)

## Joint concerns

Disclosure of commercially or personally sensitive data

Disclosure of intellectual property shared intentionally between the parties

Failure to meet legislative requirements or adverse commercial impact

- A Technology company developing software and processes to improve its customers' business performance
  - Intellectual property : Trade secrets and know how
  - Unique features and capabilities capturing market position
- Processing company data
  - Marketing
  - Bidding for work
  - Delivering technology solutions to clients
- Processing client data
  - Client confidential data – processes, systems, trade secrets, know how
  - Client commercially sensitive data – financial and transactional data
  - Client's customers personal and transactional data
- Personal data
  - Legal frameworks – different worldwide



# What behaviours or conditions create barriers and threats to maintaining confidentiality?

## Individual

Poor individual ethical approach can lead to serious consequences

- Ignorance of requirements
- Don't care attitude
- Language
- Abuse of confidentiality to achieve a favourable gain
- Hiding behind policies and contracts

## Company

Poor management can lead to serious consequences

- Lack of or poor policies
- Lack of or poor agreements (contracts)
- Poor communication of policies and contracts
- Poor security

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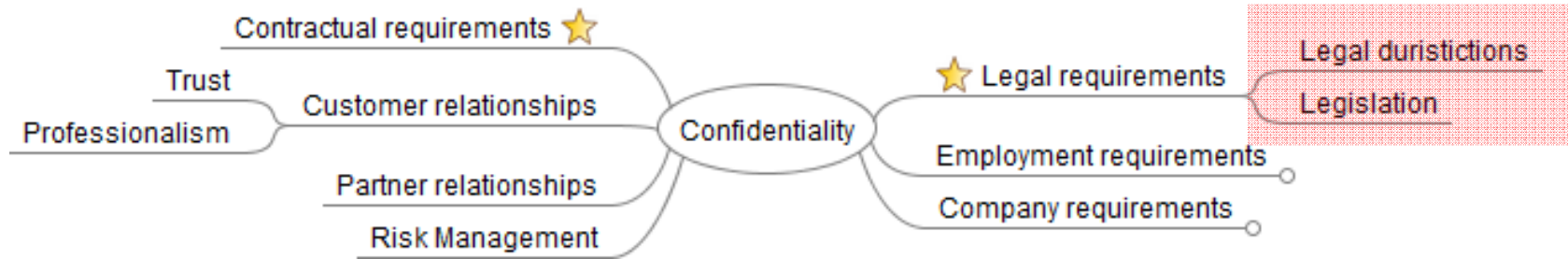
# What needs to be considered?



**Look at where the requirements come from**

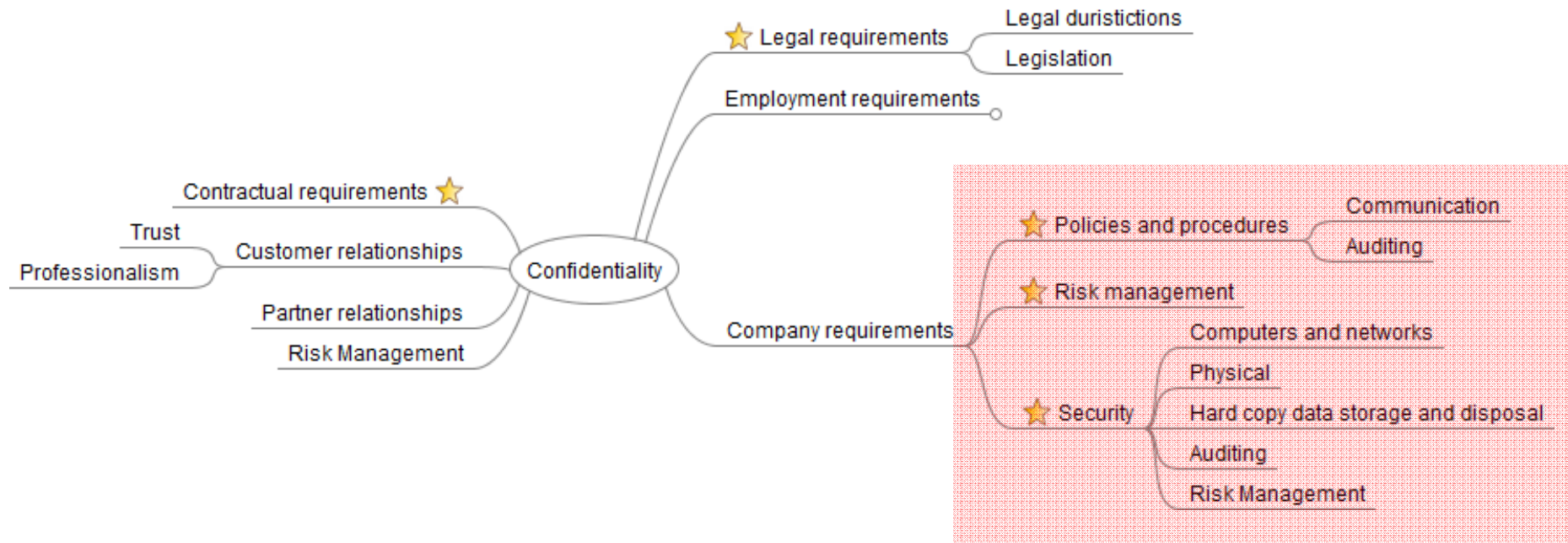
**The requirements may be vastly different between businesses**

# Legal requirements?



**Legal jurisdictions and specific requirements are not always that obvious, especially when delivering product and services to multiple countries**

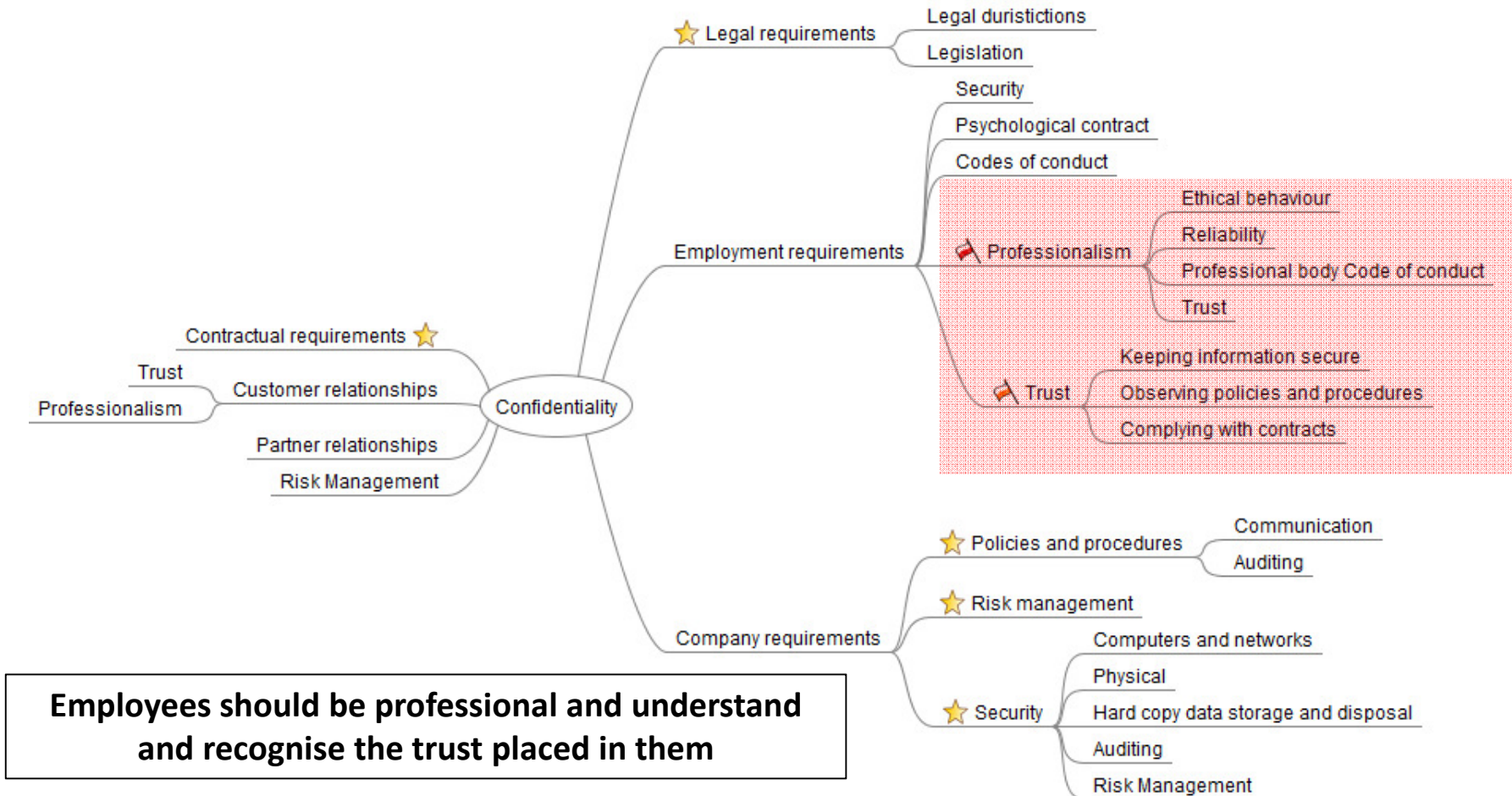
# What should the company consider?



**Companies must assess risk, apply security measures and implement policies to protect confidentiality**

**Creating the correct culture is important**

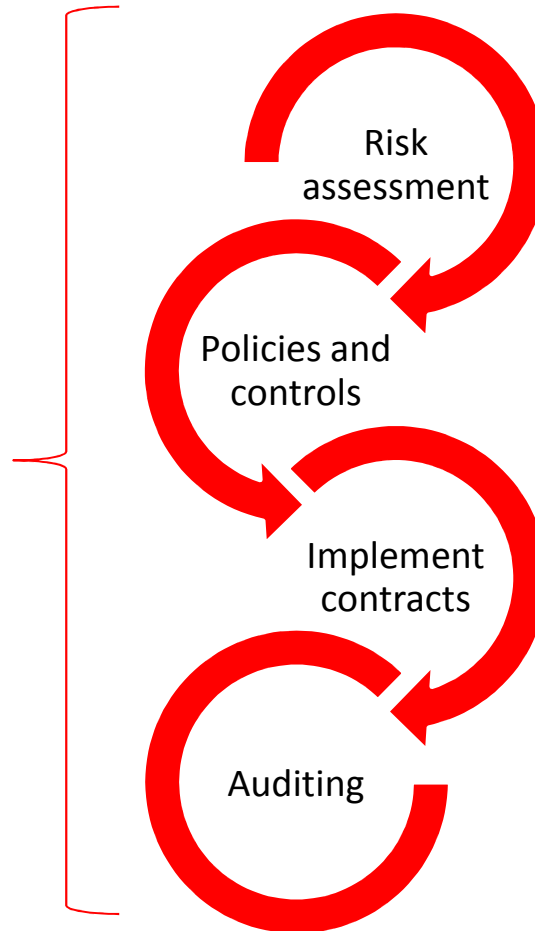
# What should the employee bear in mind?



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# Is there a process?

**An on-going and continual process**



Periodically or when something changes then assess the risk

Create policies and controls to protect information and manage the risk.

**Includes event management**

Create contracts for employees, clients, suppliers and partners to protect information and manage the risk

Audit compliance with policies, procedures and contracts



- Risk assessment lies at the heart of protecting information
  - What is confidential?
  - What could happen if information is disclosed either deliberately or accidentally?
  - What steps could be taken to remove, reduce or mitigate the risk?
  - Are the steps practical and is the cost commensurate with the risk?
  - Is the resulting risk acceptable?
- What is acceptable risk and who defines it?
  - This can vary hugely depending on what needs to be protected
    - My Facebook information
    - My bank account information
    - My company product design
    - My clients' financial data
  - Often can be driven and dictated by the client
  - Protective measures are defined by different factors which differ according to situation.
- External and independent security assessments can often be required when specific security controls are defined by clients.

## Documents

### Contracts and Policies

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- Employment contracts can define IP and confidentiality obligations.
- Non disclosure agreements and / or contract documents are used to form a contractual obligation.
- As a minimum an NDA must be signed before engaging any party if a contract does not exist.
- An NDA alone is insufficient where work on existing, or in the creation of intellectual property is being performed.
- Policies are developed and used to help define working practices and behavioural requirements

## Security

### Controls applied to protect data

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- Physical security for document storage and systems access
- Segregation of information
- Network and computer security

## Security assessments

### Internal and external assessments test the policies and controls

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- Internal risk assessment
- Client security assessment
- Independent security specialist assessment of risks and controls applied

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## Contracts and legal documents

- Engagement with other parties, both individuals, businesses and organisations requires a form of agreement to reflect the purpose of the engagement.
- These set out scope, rights, fees / costs and aim to protect the parties commercially

## Company Policies (Eg security, computer use, remote working, confidentiality etc)

- Some policies are set out in individual documents and also reflected in the Staff handbook.
- Policies apply to contract staff as well as part / full time employees
- Policies affecting security of information are particularly important to the company and to our partners and customers.

## Typical standard Contracts

- Employment – Staff
- Employment – contractor (Person)
- Employment – contractor (Business)
- SaaS (Software as a service) for internet hosted product
- Support services agreement for hosted product
- General terms of business (client based contracts)

## Other Contract forms

- Partner agreements
- Memorandum of understanding (or Agreement) (MOU / MOA)
- Supplier contracts

## Non Disclosure agreements with other parties

- Sets out the terms for confidentiality for a specific **PURPOSE**

## Purpose

The reason information is disclosed

- Be aware of only using the information for the stated purpose and **NOTHING ELSE**
- Part of the purpose is to ensure it is only disclosed to people who need it for the purpose.
- If in doubt read the agreement or ask for advice

## Storage

- Store information in one location – ie normal business premises and one room / file location and not spread elsewhere.
- Do not make multiple copies.
- Do not store confidential data on a portable computer / device unless it is encrypted

## Marking

- Information (documents) when required should be marked as confidential by the disclosing party
- Store received data on the network server in a folder entitled “Confidential” .
- If stored locally on a computer then segregate from other files and in a folder entitled “Confidential”

## Access control

Controls to be applied to protect data

- Physical security
- Segregation of information (Filing cabinet / drawer or network file folders)
- Network and computer security - client specific storage areas are established and access granted only to those people working on a project for the “purpose”

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- People and organisations must create and share information in order to conduct business, compete, innovate and grow
- Companies often own and strive to protect Intellectual Property
- Individuals can leak important information and sometimes they remove it deliberately
- The information companies hold can be vitally important to their success
- The cost of protecting information may restrict the extent to which it can be protected
- Companies must create, implement and audit contracts and policies
- Managers must regularly communicate the requirements of contracts and policies and also the implications of the business failing to
- The behaviour of individuals significantly impacts the success of a company
- If companies do not succeed then they can't employ people



# Confidentiality – a continuous cycle



End