



Cloud Computing Policy

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1 Introduction

The purpose of this document is to set out the organization's policy in the area of cloud computing.

Ipswich Rugby Football Club Limited makes extensive use of cloud computing services in the delivery of its core business systems. The nature of these services is such that data is stored outside of the Ipswich Rugby Football Club Limited internal network and is subject to access and management by a third party. Furthermore, many cloud services are offered on a multi-tenanted basis in which the infrastructure is shared across multiple customers of the Cloud Service Provider (CSP), making effective and secure segregation a key requirement.

It is therefore essential that rules are established for the selection and management of cloud computing services so that data is appropriately protected according to its business value and classification.

Cloud computing is generally accepted to consist of the following types of services:

Software-as-a-Service (SaaS) – the provision of a hosted application for use as part of a business process. Hosting usually includes all supporting components for the application such as hardware, operating software, databases etc.

Platform-as-a-Service (PaaS) – hardware and supporting software such as operating system, database, development platform, web server etc. are provided but no business applications

Infrastructure-as-a-Service (IaaS) – only physical or virtual hardware components are provided

This policy applies to the use of all types of cloud computing services and is particularly relevant where application data is stored.

2 Policy

It is Ipswich Rugby Football Club Limited policy in the area of cloud computing that:

Data belonging to Ipswich Rugby Football Club Limited will only be stored within cloud services with the prior permission of the Data Protection Officer.

Appropriate risk assessment must be carried out regarding proposed or continued use of cloud services, including a full understanding of the information security controls implemented by the CSP.

Due diligence must be conducted prior to sign-up to a cloud service provider to ensure that appropriate controls will be in place to protect data. Preference will be given to suppliers who are certified to the ISO/IEC 27001:2013 international standard.

Service level agreements and contracts with cloud service providers must be reviewed, understood and accepted before sign-up to the service.

Roles and responsibilities for activities such as backups, patching, log management, malware protection and incident management must be agreed and documented prior to the commencement of the cloud service.

Procedures must be established to perform activities in the cloud environment that are irreversible e.g. deletion of virtual servers, terminating a cloud service or restoration from backups. Supervision by a second, suitably-qualified person must be a stated part of such procedures.

The location of the data must be understood e.g. UK, EU, USA and the applicable legal basis established, such as the country whose law applies to the contract.

Where available, two factor authentication must be used to access all cloud services.

Sufficient audit logging must be available to allow Ipswich Rugby Football Club Limited to understand the ways in which its data is being accessed and to identify whether any unauthorized access has occurred.

Confidential data stored in cloud services must be encrypted at rest and in transit using acceptable technologies and techniques. Where possible encryption keys will be held by Ipswich Rugby Football Club Limited rather than the supplier.

Ipswich Rugby Football Club Limited policies for the creation and management of user accounts will apply to cloud services.

Backups must be taken of all data stored in the cloud. This may be performed either directly by Ipswich Rugby Football Club Limited or under contract by the cloud service provider.

All Ipswich Rugby Football Club Limited data must be removed from cloud services in the event of a contract coming to an end for whatever reason. Data must not be stored in the cloud for longer than is necessary to deliver business processes.