1. Scope

This procedure describes the methods by which Cognus monitors, measures, analyses and evaluates the effectiveness of the data protection. The outputs of this procedure are fed into the management review (<u>GDPR DOC 9.3</u>).

The PIMS and GDPR compliance are within the scope of this procedure.

2. Responsibilities

- 2.1 The Head of Resources is responsible for determining the requirements for monitoring, measurement, analysis and evaluation of data protection and compliance with the GDPR within Cognus.
- 2.2 Heads of Service, Team Managers and Co-ordinators are responsible for ensuring that processes under their control are appropriately monitored and measured.
- 2.3 The Head of Resources is responsible for appointing appropriately qualified persons to conduct analysis and evaluation of monitoring and measurement results.

3. Procedure (ISO27001: 2013 clause 9.1)

- 3.1 The Head of Resources identifies processes that require monitoring and measurement, according to the following conditions:
 - 3.1.1 The process produces results or by-products that can be quantitatively measured
 - 3.1.2 The process generates error reports or other evidence of nonconformance.
- 3.2 The Head of Resources ensures that Cognus's monitoring and measurement activities are listed in <u>GDPR REC 9.1</u>.
- 3.3 The Heads of Service, Team Managers and Co-ordinators monitors the process and collates measurements annually by:
 - 3.3.1 A manual process whereby Asset Owners analyses outputs and provide assurance of conformity to the process
- 3.4 The measurements are submitted to the Head of Resources annually.
- 3.5 The Head of Resources identifies appropriately qualified persons to analyse and evaluate the results of the monitoring and measurement, which is conducted annually.
- 3.6 Results of monitoring and measurement are analysed by:
 - 3.6.1 Cognus Limited will use a template documenting findings that will be completed by each Asset Owner identifying strengths and weakness of our data processing.

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MONITORING, MEASUREMENT, ANALYSIS, EVALUATION PROCEDURE (TIER 2)

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- 3.7 Results of monitoring, measurement and analysis are evaluated against the requirements of the relevant PIMS and GDPR objectives (<u>GDPR REC 4.11</u>)
- 3.8 Results of the analysis and evaluation are documented within our the GDPR section of the Intranet and submitted to the management review (<u>GDPR DOC 9.3</u>).

Document Owner and Approval

The Head of Resources is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all team members on the Intranet.

This procedure was approved by the Head of Resources on 21/05/2018 and is issued on a version controlled basis under his/her signature.

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Signature:

Date:21/05/2018

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Head of	21/05/2018
		Resources	

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