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provided under contract to Post Office

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Author & Dept: Phil Boardman, Fujitsu Service Architect

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Approval Authorities:

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Note: See Post Office Account HNG-X Reviewers/Approvers Role Matrix (PGM/DCM/ION/0001) for guidance.

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0.2 Document History

Version No.	Date	Summary of Changes and Reason for Issue	Associated Change - CP/PEAK/PPRR Reference	
1.0	24/08/06	Agreed		
1.1	28/08/08	Amendments after Aug 08 review with POL		
2.0	31/12/2008	Agreed		
2.1	09/08/2010	Amendments after review of service. Change for CT0724		
2.2	13-Oct-2010	Updated in response to review comments		
3.0	15-Oct-2010	Approval version		
3.1	28 –Oct 2013	Amendments for CCNs listed	CCN1305a, CCN 1306a, CCN1309a, CCN 1332a	
3.2	30-Oct-2013	Revised following CISO review.	As above	
3.3	12-Nov-2013	Minor corrections for review version.	As above	
3.4	22-Nov-2013	Definition of abbreviations from 2.1.7 (G) added to section 0.5.		
3.5	25-Nov-2013	Corrections to document references in 0.3; 2.1.6; 2.1.9.1,		
4.0	04-Dec-2013	Approval version		
4.1	20 –Mar-2014	Amendment for CCN listed; deleted section 3 HNG-X Applications Roll Out – Transitional Period; corrected section numbering.	CCN1400	
5.0	04-Apr-2014	Approval version [subsequently not approved]	CCN1400	
6.0	21-May-2015	Approval version: same content, Fujitsu author and Fujitsu and POL approvers and reviewers changed only, shown in italics. [subsequently not approved]	CCN1400	
6.1	24-Aug-2021	Amend 1.1 to remove Credence/MDM.	CCN1400	
		Amend 1.1 to remove Salesforce Support.	CCN1601	
		Amend 1.1 to remove POLSAP Applications Support.	CCN1609	
		Amend 1.1 to remove POLSAP Hosting.	CCN1655	
		Amend 0.4; 2.1.12 to refer to DES/SEC/ION/2006. Add new 2.1.15.2 AUW PCI scanning. Delete 2.1.17 LINK Compliance Questionnaire.	CCN1660a	
		Amend 2.1.15; 2.1.16.4 with reference to Payment and Banking Service.	CCN1672a	
		Amend 1.2; 2.1.5; 2.1.6.1; 2.1.6.2; 2.1.7; 2.1.8.1; 2.1.8.2; 2.1.11; 2.1.12; 2.1.13; 2.1.18; 2.1.19; add new 1.2.1; 1.2.2; in respect of migration to Post Office Cloud.	CCN1678	
6.2	08-Nov-2021	Correction to cross-references within 2.1.16.		
		Add part F to 2.1.3 to include Management of SHA-2 cryptographic material.	CCN1671	
6.3	24-Feb-2022	Amendments in response to some of the Post Office comments submitted on 23-Dec-2021:		
		POL approvers and reviewers amended as requested.		
		Section numbers amended at 2.1.5; 2.1.6; 2.1.7; 2.1.13.		
		Amend 2.1.2 A to remove reference to Service Desk.	CCN1409	
		Amend 2.1.2 A to remove reference to Service Integration Service	CCN1610	





		Delete 2.1.6.2.1 D Global User Request activity, no longer a	CCN1637b
		Fujitsu responsibility.	CCN1037B
6.4	25-May-2022	Added optional reviewers as POL request.	
6.5	30-May-2022	Amended typographical (punctuation only) errors in 2.1.2.A, 2.1.6.2.2.A.	
		Corrected references in 2.1.8.2.D, 2.1.9.1 from SVM/SDM/PRO/0012 to SVM/SDM/PRO/0018.	
7.0	07-Jun-2022	Approval version	
7.1	17-Mar-2023	CCN1657d	
		Amend 2.1.15 "Period Two", "Search Criteria", and 2.1.16.4.	CCN1701
		Divide 2.1.19 into two, adding new 2.1.19.2 Weekly Reporting.	CCN1718
		Add new 2.1.15.1.2 to cover signing and encryption of data queries.	CCN1723a
7.2	21-Apr-2023	Removed Dionne Harvey from review and approver tables.	
8.0	26-Apr-2023	Approval version	

0.3 Review Details

Review Comments by :				
Review Comments to : Matthew Lenton & Po	st Office Account Document Management			
Mandatory Review				
Role	Name			
Post Office: CISO for Retail and Controls	Dean Bessell GRO			
Post Office: Head of Horizon Commercial and Contract Management	Rajivsinh Rathod EGRO			
Post Office: IT Document Specialist	Steven Vouthas (GRO >			
Fujitsu: Commercial Manager	Helen Venters			
Fujitsu: CISO	Steve Browell			
Fujitsu: Service Architect	Phil Boardman			
Optional Review				
Role	Name			
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Post Office: Security Assurance and Governance Specialist	Julian Higgs ← GRO			
Post Office: Head of Security Architecture	Julian Higgs GRO Dave King GRO GRO			
Post Office: Head of Post Office CCOE	Ben Owens GRO			
Post Office: Head of Integration Engineering, MI, Data Strategy & Analytics	Graham Bevan GRO			
Post Office: CCOE Service Manager	James High GRO			
Fujitsu: Information Security Management	Chris Stevens; Farzin Denbali			
Fujitsu: SSC (for Configuration Management)	Adam Woodley			
Fujitsu: Security Architect	Dave Haywood			
Fujitsu: Service Architecture Lead	Alex Kemp			
Fujitsu: Document Manager	Matthew Lenton			
Fujitsu: Head of Service Delivery	Steve Bansal			

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Issued for Information – Please restrict this distribution list to a minimum	
Position/Role	Name

0.4 Associated Documents (Internal & External)

Reference	Version	Date	Title	Source
PGM/DCM/TEM/0001			POA Document Template	Dimensions
(DO NOT REMOVE)				
DES/SEC/ION/2006			PCI Cardholder Environment	Dimensions
SVM/SDM/PRO/0018			POA Operations Incident Management Procedure	Dimensions
SVM/SEC/POL/0003			Post Office Account HNG-X Information Security Policy	Dimensions
SVM/SDM/SD/0015			Reconciliation Service, Service Description	Dimensions
(POL: POL/HNG/CIS/001) SVM/SEC/POL/0005			POL Community Information Security Policy for Horizon	Dimensions
SVM/SEC/PRO/0009			POA HNG-X Patch Management Work Instruction	Dimensions
SVM/SEC/STD/1985			Network Operational Security Enforcement Configuration	Dimensions

Unless a specific version is referred to above, reference should be made to the current approved versions of the documents.

0.5 Abbreviations

Abbreviation	Definition
APOP	Automated Payment Out Payment
ARQ	Audit Record Query
CAN	Platform code for the Certification Authority Server
CCD	Contract Controlled Document
CISP	Community Information Security Policy
EPOSS	Electronic Point of Sale
ID	Identification Number
IDS	Intrusion Detection System
IPS	Intrusion Prevention System
ISMF	Information Security Management Forum
ISO	International Standards Organisation
KMNG	Key Management
MIS	Management Information System

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^{(*) =} Reviewers that returned comments





NPS	Network Persistent Store		
PAN	Primary Account Number		
PCI DSS	Payment Card Industry Data Security Standard		
PIN	Personal Identification Number		
POL	Post Office Ltd		
POA	Fujitsu Post Office Account		
TES QA	Transaction Enquiry Service Query Application		
TOR	rms of Reference		
VPX	HNG-X VPN (Virtual Private Network) Server		
VSD	Virtual Server Host Discrete		

0.6 Glossary

Term	Definition

Changes Expected

Changes				

Information Classification

The author has assessed the information in this document for risk of disclosure and has assigned an information classification of FUJITSU RESTRICTED (COMMERCIAL IN CONFIDENCE).

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SERVICE SUMMARY 1

Introduction 1.1

The Security Management Service provides a range of security-related activities that support the establishment and maintenance of an ISO 27001 compliant infrastructure. The Security Management Service monitors operations and introduces specific protective security controls to maintain the integrity, availability and confidentiality of information used and produced by the various Services, other than the Service Integration Service.

1.2 **Deliveries**

Fujitsu's contractual obligations for delivering and maintaining provision of a secure system is set out in Clause 16 (Security) of the Agreement. The Security Management Service consists of the following elements for management of the security of the HNG-X Service Infrastructure and the HNG-X Application:

- (a) Implementation and maintenance of Post Office security policy and procedures;
- Compliance monitoring and audit; (b)
- Cryptographic key management; (c)
- (d) Security event management and firewall event analysis;
- (e) System and physical access control;
- (f) Anti-virus and malicious software management;
- Monitoring of any IDS or IPS in place; (g)
- (h) Security incident reporting and problem management;
- (i) System security change management;
- (j) Security awareness and training;
- (k) Information Retrieval and Audit;
- (l) Subject Information Requests management;
- (m) Prevailing threats and vulnerability management;
- (n) Litigation support;
- LINK compliance questionnaire; (0)
- (p) Management of Risk;
- (q) Monthly Reporting;
- (r) File Integrity Monitoring;
- (s) PCI DSS support;
- (t) PCI DSS internal penetration testing.

1.2.1 Security of the HNG-X Application when Migrated to Post Office Cloud

In order for the Security Management Service to continue to provide support for those service elements. in the event that scanning and monitoring identify potential incidents, and to continue to provide other





relevant HNG-X Operational Services, Fujitsu Services will be dependent on the following Post Office Responsibilities:

- Post Office's provision of vulnerability management for operating systems and the underlying infrastructure of the Post Office Cloud; and
- Post Office's provision of the following security technologies for use in the Post Office Cloud:
- i. anti-virus and malicious software tooling;
- intrusion detection or prevention mechanisms;
- iii. file integrity monitoring tooling; and
- Vulnerability scanning technology. iv.

1.2.2

Fujitsu Services shall not be entitled to relief under clause 39 where the Post Office Responsibilities in paragraph 1.2.1 are failed as a direct result of unauthorised access or hacking (whether or not constituting an offence under the Computer Misuse Act 1990) to the Post Office Cloud or the Post Office Service Environment (which is gained through the Post Office Cloud) which were caused by vulnerabilities or incidents directly arising out of:

- (a) Fujitsu Services not complying with its security obligations set out in this Agreement in respect of the HNG-X Application;
- (b) Fujitsu Services not complying with Paragraph 1.2A of Schedule C3; or
- (c) a breach of Fujitsu Services' obligations under this Agreement or Applicable Law caused by Fujitsu Services' negligence.

1.3 Training

The Security Management Service staff will be appropriately trained to carry out the Service and training requirements reviewed on a yearly basis.

1.4 Responsibilities

In performing the Security Management Service, Fujitsu Services shall be responsible for:

- A. Delivery of the security policy as specified in paragraph 4.1.3 of Schedule A4 of the Agreement;
- B. Maintaining with Post Office the identity of the persons from both Parties authorised to receive sensitive security-related material (including cryptographic key components);
- C. Liaising with Post Office in the manner described in the CCD entitled: "Post Office HNG-X Account Information Security Policy" (SVM/SEC/POL/0003); and
- D. Running a Monthly Security Forum with input by POA Operational Security providing agreed Monthly reports.
- E. Assurance of the P2Pe Asset Tracking Process and auditing of the adherence to the process by Fujitsu Services and its sub-contractor.

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HNG-X 2

SERVICE DEFINITION 2.1

2.1.1 SECURITY ORGANISATION AND MANAGEMENT

Security organisation and management within the Security Management Service provides a number of organisational and management activities required for compliance with ISO 27001 and to support PCI DSS standard. These are:

- A. The setting up and operating of the ISMS compliant with ISO27001
- B. the co-ordination of security activities and prioritising of activities according to risk within the appropriate Fujitsu Services Security risk register;
- C. the creation and maintenance of security-related procedural and process documentation to assist compliance and help maintain correct operation by Fujitsu Services and Post Office staff;
- D. the regular reviews of Fujitsu Services Security Management Service documentation to provide appropriate security input and compliance to the requirements of ISO 9001;
- E. the management of ISO 27001 gap analysis, preparation of a plan for implementation in accordance with agreed terms of reference (TOR) and monitoring of corrective actions;
- F. informing Post Office of any changes to the HNG-X Infrastructure and Applications that are likely to have an impact upon security; and
- G. Support POL with PCI DSS framework to achieve their compliance.

2.1.2 COMPLIANCE MONITORING AND AUDIT

Compliance monitoring and audit within the Security Management Service provides a number of compliance monitoring and audit activities required for compliance with ISO 27001. These are:

The undertaking of periodic physical security and system security audits of the Data Centre, and other locations used to provide the Services on a risk management basis to provide ongoing assurance of compliance to security policies and procedures. Activities will include reviews of operational processes, provision of reports covering IT, environmental, physical, personnel security etc. and the monitoring of identified corrective actions;

and

- The provision of advice and guidance on issues affecting personnel security within Fujitsu Services including the investigation of personnel security issues and staff vetting queries.
- Produce a monthly plan to address the various Audit and ISO/IEC 27001 compliance issues, and shared with the customer in the monthly review.

2.1.3 CRYPTOGRAPHIC KEY MANAGEMENT

The cryptographic key management element of the Security Management Service provides a number of cryptographic key management activities. These are:

A. Management of the KMNG Workstation and the Active Directory SubCA for the creation. distribution and installation of required cryptographic material to the live estate and the maintenance of periodic key replacement for all Branches in addition to the safeguarding of live and reserve keys;

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- B. Operation of Key management functionality and configuration changes to the HNG-X Application in order to optimise service;
- C. Management of KMNG and Active Directory (SubCA) event logging and incident handling to assist the Service Desk Service, the Systems Management Service, the Third Line Support Service and the Application Support Service (Fourth Line) in error resolution and problem management;
- D. Management of the manual cryptographic estate by maintaining the creation, distribution, auditing and periodic replacement of cryptographic keys within agreed timescales; and
- E. Supervision and management of the Root CA (CAN) as the trust anchor of the HNG-X system.
- F. Management of SHA-2 cryptographic material for the CAPO interface.

2.1.4 PIN PADS

- 2.1.4.1 The Security Management Service shall ensure PIN Pads comply with the requirements of ISO 9564. Fujitsu Services' key management service for any key directly or indirectly protecting the secrecy of PIN values (together, "PIN Encryption Keys") shall comply with ISO 11568 Parts 1 to 3.
- 2.1.4.2 The key management service used between each PIN Pad and the rest of the HNG-X Services shall be the DUKPT scheme as described in paragraph 6.2 of Schedule A4 of the Agreement.
- 2.1.4.3 In the event of an actual or suspected key compromise in respect of a PIN encryption key used within the HNG-X Services, Fujitsu Services shall implement key change mechanisms in accordance with the principles stated in ISO 11568 Parts 1 to 3.

2.1.5 SECURITY EVENT MANAGEMENT AND FIREWALL EVENT ANALYSIS

The security event management and firewall event analysis element of the Security Management Service provides a number of security event management and firewall event analysis activities. These include:

2.1.5.1 For those elements of the HNG-X System not migrated to Post Office Cloud:

- A. Management of audit mechanisms to monitor detect and record events that might threaten the security of the HNG-X Service Infrastructure;
- B. Operation of the security event management system utilising the Systems Management Service system to track and report events of security significance and daily monitoring of the security event management system to identify relevant events and logging of details;
- C. Regular analysis of audit trails to identify new features and vulnerabilities introduced by new systems to facilitate trend analysis and to assist the investigation of security breaches;
- D. Reviewing security configurations of event filters to optimise efficiency and minimise security weaknesses;
- E. Undertaking risk assessments to establish adequate firewall policies / rule bases and the subsequent monitoring of events generated by the HNG-X Service Infrastructure;

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- F. Analysis of firewall event logs using trend analysis software to identify the presence of any potential attacks or of areas of vulnerability and the provision of advice for any remedial action; and
- G. Prompt investigation and remedial action in order to minimise the impact of any security breach.

2.1.5.2 For those elements of the HNG-X System migrated to Post Office Cloud:

- A. Daily monitoring of the security event management system to identify relevant HNG-X Application events and logging of details;
- B. Regular analysis of audit trails to identify new features and vulnerabilities introduced by new HNG-X Application systems to facilitate trend analysis and to assist the investigation of security breaches:
- C. Reviewing security configurations of HNG-X Application event filters to optimise efficiency and minimise security weaknesses; and
- D. Prompt investigation and remedial action in order to minimise the impact of any HNG-X Application security breach.

2.1.6 SYSTEM AND PHYSICAL ACCESS CONTROL

The system and physical access control element of the Security Management Service provides a number of system and physical access controls which are defined within the document entitled: "Access Control Policy" (RS/POL/003), these are:

2.1.6.1 SYSTEM ACCESS CONTROL

2.1.6.1.1 For those elements of the HNG-X System not migrated to Post Office Cloud this consists of:

- A. Management of the process for validating those Users are authorised before being permitted access to the HNG-X Service Infrastructure.
- B. Management of the allocation and auditing of Ikey tokens are used to validate that Fujitsu Services users who access the HNG-X Central Infrastructure from locations remote from the Data Centres do so via secondary token authentication.
- C. Management of system controls in the environment, Data Centre or location where the HNG-X Services are performed.

2.1.6.1.2 For those elements of the HNG-X System migrated to Post Office Cloud this consists of:

A. Management of the process for validating and removing those Users are authorised before being permitted access to the HNG-X Application in adherence with sections 11.2 and 11.3 of the CRD entitled "Community Information Security Policy for Horizon" (SVM/SEC/POL/0005).

2.1.6.2 PHYSICAL ACCESS CONTROL

2.1.6.2.1 For those elements of the HNG-X System not migrated to Post Office Cloud this consists of:

A. Access to the live or test Data Centre is requested by a Fujitsu Services user via Fujitsu Services' online system in the following manner:





- the Fujitsu Services user will receive an e-mail to acknowledge submission;
- the Data Centre Operations Service will check throughout the day/night for any requests not yet actioned;
- the Data Centre Operations Service will action request with approval or rejection; and
- the Fujitsu Services user will receive notification to sanction request or refuse request with the reason for non-approval.
- B. All Fujitsu Services users shall register and sign-in at reception when visiting the various premises occupied by the Service Desk Service, Systems Management Service and Third Line Support Service respectively.
- C. All TES QA users will be approved and a list of users restricted to a maximum of 20 will be maintained by both POL operations and Fujitsu Services. This list will include asset records and user login details.

2.1.6.2.2 For those elements of the HNG-X System migrated to Post Office Cloud this consists of:

- A. All Fujitsu Services users shall register and sign-in at reception when visiting the various premises occupied by the Systems Management Service and Third Line Support Service respectively.
- B. All TES QA users will be approved and a list of users restricted to a maximum of 20 will be maintained by both POL operations and Fujitsu Services. This list will include asset records and user login details.

2.1.7 ANTI-VIRUS AND MALICIOUS SOFTWARE MANAGEMENT

The anti-virus and malicious software management element of the Security Management Service provides a number of anti-virus and malicious software management activities; these are:

2.1.7.1.1 For those elements of the HNG-X System not migrated to Post Office Cloud:

- A. Management of the distribution of updated anti-virus software and appropriate signatures across the HNG-X Service Infrastructure to maintain protection of the HNG-X Services from viruses and malicious software;
- B. Initial configuration of alerting mechanisms and event filters to provide automatic notification and prompt virus incident response:
- C. Provision of regular updates to identify and cleanse new and emerging virus strains;
- D. Daily and periodic checks of emerging viruses and other malicious software to be informed of threats and to determine the available defensive measures; and
- E. Provision of event monitoring and incident response via normal incident handling procedures. Analysis of details to understand the threat and inform corrective actions.
- F. Monthly reporting in consideration of any of the above.
- G. Conducting of scheduled scan on PCI platforms and save Log files for further analysis for a period of 12 months. (MIS ,NPS, VSD, VPX Platforms).

2.1.7.1.2 For those elements of the HNG-X System migrated to Post Office Cloud:

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- A. Management of the distribution of updated anti-virus software and appropriate signatures across the PODG file shares to maintain protection of the PODG Service from viruses and malicious software;
- B. Initial configuration of alerting mechanisms and event filters to provide automatic notification and prompt virus incident response for PODG Service:
- C. Provision of regular updates to identify and cleanse new and emerging virus strains for PODG Service, only:
- D. Daily and periodic checks of emerging viruses and other malicious software to be informed of threats and to determine the available defensive measures for PODG Service, only; and
- E. Provision of event monitoring and incident response via normal incident handling procedures. Analysis of details to understand the threat and inform corrective actions for PODG Service, only.
- F. Monthly reporting in consideration of any of the above for PODG Service, only.

2.1.8 PREVAILING THREATS AND VULNERABILITY MANAGEMENT

- 2.1.8.1 The Security Management Service shall ensure that any prevailing threats and vulnerabilities arising from hackers and / or crackers are managed in accordance with ISO 27001. Such prevailing threats and vulnerabilities may be exploited despite the presence of anti-virus monitoring, firewalls and intrusion detection software which Fujitsu Services has in place throughout the HNG-X Service Infrastructure (this element of Security Management Service to be limited to the HNG-X Application for those elements of the HNG-X System migrated to Post Office Cloud) and may be as a result of:
 - A. Software defects requiring vendor issued patches;
 - B. Insecure accounts with weak or non-existent passwords;
 - C. Unnecessary services, for example, telnet or remote access;
 - D. Built in weaknesses, for example, backdoor accounts:
 - E. System misconfiguration; and
 - F. Trend analysis and forecasting of potential issues.
- 2.1.8.2 In managing such prevailing threats and vulnerabilities, the Security Management Service will:
 - A. Assess the existing vulnerabilities on each element of the HNG-X Service Infrastructure (this element of Security Management Service to be limited to the HNG-X Application for those elements of the HNG-X System migrated to Post Office Cloud);
 - B. Determine the degree of risk for each vulnerability identified;
 - C. Contain or resolve the vulnerability by the updating of Hardware and / or Software versions (this element of Security Management Service to be limited to Software, only, for those elements of the HNG-X System migrated to Post Office Cloud) or by applying vendor issued service packs, hot fixes or Software patches; and
 - D. In any investigation carried out by Post Office and/or by Fujitsu Services of any potential or actual security breach or threat, Post Office and Fujitsu Services shall report to each other (or Fujitsu Services shall report to Post Office Limited, if required by Post Office) any actual or potential security breach or threat identified in the course of such investigation that may have a material adverse effect upon the security of the Infrastructure. The procedures by which such threats shall be reported and the methodology for investigating and resolving business incidents (disputed Banking & Related Services Transactions are defined within the CCD entitled





"Reconciliation Service, Service Description" (SVM/SDM/SD/0015)) shall be as set out in the document entitled "POA Operations Incident Management Procedure" (SVM/SDM/PRO/0018).

2.1.9 SECURITY INCIDENT REPORTING AND PROBLEM MANAGEMENT

- 2.1.9.1 The security incident reporting and problem management element of the Security Management Service provides a number of security Incident reporting and problem management activities defined in detail in the document entitled: "POA Operations Incident Management Procedure" (SVM/SDM/PRO/0018). These are:
 - A. Provision of a central point of contact for all security related issues;
 - B. Investigation and reporting to post office of any actual or potential threats or breaches that may have a material effect on the HNG-X services in accordance with agreed procedures; and
 - C. Provision of ongoing liaison with Post Office and support to the Fujitsu Services' Security Board as defined in the CCD entitled "Post Office HNG-X Account Information Security Policy" (SVM/SEC/POL/0003).

2.1.10 SYSTEM SECURITY CHANGE MANAGEMENT

The system security change management element of the Security Management Service provides a number of system security change management activities. These are:

- A. Management of security compliance with agreed change processes and the assessment of the business and security impact of incident and problem management systems including the provision of options for resolution and containment of security and business risk; and
- B. Assessment of the business and security impact of change requests and the assessment and approval/rejection of security related operational change requests.
- C. Monthly reporting on existing service changes.

2.1.11 PCI PENETRATION TESTING SERVICE

A penetration testing service will be provided as a call-off service to POL. This service will be provided to POL annually or the test will also be conducted if significant changes occur to the infrastructure / applications within PCI cardholder environment.

Fujitsu will organise an internal tester to conduct an infrastructure penetration test of service accessible in the PCI cardholder environment from three external interfaces (Branch, Internet and Support). The testing will cover both Network and Application Layers.

The test will not cover plugging directly into the cardholder environment and a scan of the hosts; as such this test will concentrate on the compromise of services that the firewalls permit access to.

Exclusions:

- If an external test or support for an external test is required this will be subject to Change Control.
- Any remediation work identified as required as part of the penetration test.
- This element of Security Management Service is not provided for those elements of the HNG-X System migrated to Post Office Cloud.

2.1.12 FILE INTEGRITY MONITORING

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The file integrity monitoring service protects the integrity of personal and sensitive data within the PCI DSS card holder data environment by checking whether the data and logs are not being altered as required by the requirements 10.5.5 of the PCI DSS standard and critical system files. Configuration and content files are monitored as required by requirement 11.5 of the standard.

File integrity monitoring solution (Tripwire) acts to alert personnel about unauthorised modification of critical system files, configuration files or content files and the software should be configured to perform critical file comparison at least on a weekly schedule and monitored by security operations under proactive monitoring. The software is configured to operate over the platform types detailed in Section 3.1 Platforms of CCD PCI Cardholder Environment (DES/SEC/ION/2006). Those platform types identified within the table as not having file integrity monitoring deployed to them are platforms implemented using appliances onto which file integrity monitoring (Tripwire) is not able to be deployed.

File integrity monitoring activities will be provided Monday to Friday from 09:00 to 17:30 Hrs excluding public holidays.

For the avoidance of doubt, this element of Security Management Service is not provided for those elements of the HNG-X System migrated to Post Office Cloud.

2.1.12.1 Configuration Management / Baseline reviews:

- The Fujitsu system architect, platform owners and Security operations resources will identify and agree the initial scanning baseline, identifying files and folders to be scanned and the ones to be excluded.
- The baseline will require initial reviews to be carried out on a monthly basis until the baseline is stable and will then require quarterly reviews to be completed.
- Software, Hardware Maintenance and hosting capability in Fujitsu's Data Centre.

2.1.12.2 Weekly Scanning

Scans scheduled to run on a weekly basis on the applicable PCI platforms as detailed in the CCD PCI Cardholder Environment DES/SEC/ION/2006.

2.1.12.3 Monitoring of Tripwire Service and Scans

- A. Carry out checks to confirm that the Tripwire service is running on all the required PCI platforms, managing any issues / events raised as part of the daily checks.
- B. Provide product support to interfacing to the third party, to manage the file integrity monitoring product tool set.
- C. POA security operation will check the output of scheduled scans review reports produced and determine why changes occurred and raise an appropriate call for any exceptions that have been identified that are not covered by operational change activities.
- D. POA security will carry out periodic reviews of the baseline on a quarterly basis, identifying any files/folders that should be excluded/added to the schedules and presented for discussion at the next review session whilst including the necessary amendments to the baseline for any changes to the PCI platforms.
- E. Scans to be retained for period of 12 months and will be available for review.

2.1.12.4 Reporting

Report requirements to be agreed between POL and Fujitsu these will be produced and made available to the Information Security Management Forum (ISMF) and Service Management Reviews (SMR).

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2.1.12.5 Output from Fujitsu

Monthly reports

- Success/Failures status on reports run and remediation work
- Percentage of file folder exceptions
- Tripwire service availability.

2.1.13 PCI SUPPORT FOR POST OFFICE

CCN1332a introduced additional obligations on Fujitsu Services in supporting POL's PCI DSS compliance, as follows:

2.1.13.1 For those elements of the HNG-X System not migrated to Post Office Cloud:

- A. Update of DES/SEC/ION/2006 PCI card holder environment on annual basis
- B. Review of actual firewall configuration against SVM/SEC/STD/1985 Operational Firewall policy on a bi-annual basis
- C. Additional review steps to be added to SVM/SEC/PRO/0009 Patch Management process to include the ranking of vulnerabilities
- D. Ongoing population of the POL provided Omniport tool to record approximately 255 task per annum as detailed in PCI DSS Standard
- E. Management of the Fujitsu Services user accounts and ensuring timely updates are loaded in to Omniport
- F. Fujitsu Services will provide resources to support POL in their controlled self-assessment annual audit against the PCI DSS Standard.

2.1.13.2 For those elements of the HNG-X System migrated to Post Office Cloud:

- A. Additional review steps to be added to SVM/SEC/PRO/0009 Patch Management process to include the ranking of vulnerabilities
- B. Ongoing population of the POL provided Omniport tool to record approximately 255 task per annum as detailed in PCI DSS Standard
- Management of the Fujitsu Services user accounts and ensuring timely updates are loaded in to Omniport
- D. Fujitsu Services will provide resources to support POL in their controlled self assessment annual audit against the PCI DSS Standard.

2.1.14 SECURITY AWARENESS AND TRAINING

A programme of security awareness training, including Information Security overviews, is provided to all new arrivals, as part of induction training. The service covers the provision of periodic awareness activities and training including induction training, presentations and briefing notes and input to magazines, journals and other periodicals.

The Fujitsu Services POA Security Communications Strategy details the various communication channels that are used and the different vehicles and methods available for ensuring that key messages regarding Information Security are effectively communicated to staff at all levels engaged in the Fujitsu Services POA.

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2.1.15 INFORMATION RETRIEVAL AND AUDIT

2.1.15.1 **DESCRIPTION OF TERMS**

"Banking Transaction Record Query" means a record query in respect of a Banking & Related Services Transaction which the Data Reconciliation Service Host (DRSH) has reconciled or has reported as an exception, the result or records of which are subsequently queried or disputed by Post Office or a third party:

"Audit Record Query" means a record query that is not a Banking Transaction Record Query and which relates to Transactions.

"APOP Voucher Query" means a record guery for APOP voucher archived records;

"Old Data" Fujitsu Services is required to hold 7 years transaction records; 'Old Data' is no longer available;

"Period One" means, in respect of each Transaction the period of 90 days commencing on the date of that Transaction:

"Period Two" means, in respect of each Transaction the period commencing the day after expiry of Period One for that Transaction, expiring on the earlier of:

- A. seven (7) years in the case of Transaction records and
- B. the date of completion of transfer of Post Office Data (including the record of that Transaction) in accordance with Schedule E of the Agreement;

"Query Day" means each date against which an Audit Record Query is raised;

"New Data" means the extraction of records created on and following the 3rd January 2003 relating to Banking & Related Services Transactions (and, in the case of Audit Record Queries relating to all Transactions) meeting the Search Criteria, such extraction being limited to specific types of information/data fields as follows:

- A. in the case of an Audit Record Query for Horizon transaction records the ID for the User loggedon, Counter Position ID, stock unit reference, Transaction ID, Transaction start time and date, Customer Session ID, mode (e.g. serve customer), product number and quantity, and sales value, Entry Method, State, IOP Ident, Result, Foreign Indicator, and for HNG-X transaction records - the ID for the User logged-on, Counter Position ID, stock unit reference, Transaction ID, Transaction start time and date, Customer Session ID, mode (e.g. serve customer), product number and quantity, and sales value, Entry Method.
- B. in the case of a Banking Transaction Record Query Banking & Related Services Transaction ID, Banking & Related Services Transaction type, receipt date, receipt time, the reason code (in the case of a discrepancy) and DRSH sub-value(s) (e.g. C0 Confirmation, C1 Confirmation, NB Decline.

an 'Event Log' will also be produced and provided with the Audit Record Query, detailing; for Horizon transaction records - GroupID, ID, date, User, SU, EPOSSTransaction.T and EPOSSTransaction.Ti and for HNG-X transaction records - GroupID, ID, date, User, SU, ReportingEventID and EventDetailMsg.

"Search Criteria" means: To be specified for each individual Record Query. In the case of an Audit Record Query of either:

- A. The date or dates (not exceeding 31 consecutive days), and either of: i) CRM Token, for Transactions performed at Counter Positions migrated to Payment and Banking Service; or ii) PAN (or equivalent identifier), for Transactions performed at Counter Positions not yet or prior to being migrated to Payment and Banking Service; or
- B. The date or dates (not exceeding 31 consecutive days), and Branch; or in the absence of a Branch the full Branch postal address;

In the case of a Banking Transaction Record Query of either:

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- A. Date, Branch and either of: i) CRM Token, for Transactions performed at Counter Positions migrated to Payment and Banking Service; or ii) PAN, for Transactions performed at Counter Positions not yet or prior to being migrated to Payment and Banking Service; or
- B. Date and Branch,

Fujitsu Services shall have access (such access being restricted to properly authorised Fujitsu Services staff) to records of each Banking & Related Services Transaction during Period One and Period Two.

- 2.1.15.1.1 Fujitsu Services shall carry out the data queries in accordance with the limits set out in section 2.4.1 of this Security Management Service, Service Description.
- **2.1.15.1.2** Fujitsu Services' responses to the data queries will be digitally signed and encrypted to ensure integrity, confidentiality, and non-repudiation. Currently, such security is managed by the use of PGP tooling for packaging the response data and Quatrix tooling for its delivery, though such tooling may be subject to change by mutual agreement between the Parties.

2.1.15.2 Audit Workstation PCI Data Scanning

Audit Workstations (AUW) are used to extract data to support the ARQ service, functionality on the Audit Workstations enables decryption of PAN numbers, this functionality is required to assist and support Police investigations into fraud. AUW may store the PAN numbers in the clear, and a PCI control states that where there is a business need to use PCI data in the clear, controls must be put in place to periodically check that the tools used are not permanently storing the data and are cleared down of any PCI data in the clear. Card Recon software has been deployed to periodically scan the Audit Workstations for PCI data in the clear, scanning will be performed quarterly, and any PCI data being found to have been stored in the clear will be cleared.

2.1.16 LITIGATION SUPPORT

- **2.1.16.1** Where Post Office submits an Audit Record Query in connection with litigation support, at Post Office's request Fujitsu Services shall, in addition to conducting that query:
 - A. Present records of Transactions extracted by that query in, Excel or native flat file format, as agreed between the Parties; and
 - B. Subject to the limits set out in section 2.4.1 analyse:
 - I. the appropriate Service Desk records for the date range in question; and
 - II.in order to check the integrity of records of Transactions extracted by that query;
 - III. request and allow the relevant employees of Fujitsu Services to prepare witness statements of fact in relation to that query, to the extent that such statements are reasonably required for the purpose of verifying the integrity of records provided by Audit Record Query and are based upon the analysis and documentation referred to in this section 2.1.16 of this Security Management Service, Service Description; and
 - IV. request and allow the relevant employees to attend court to give evidence in respect of the witness statements referred to in the sub-section C III above:
 - C. Provided that:
 - V. Fujitsu Services' obligations set out in sub-sections A and B above shall be limited, in aggregate, to dealing with a maximum of 150 (in aggregate) Record Queries per year (on a rolling year basis);

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- VI. Fujitsu Services' obligations in the case of provision of witnesses referred to in subsection C above shall be to provide witnesses to attend court up to a maximum (for all such attendance) of 60 days per year (on a rolling year basis).
- **2.1.16.2** For the avoidance of doubt the target times set out in Table 1 for dealing with Audit Record Queries shall not apply in respect of Fujitsu Services' obligations under subsection 2.1.16.1.C above.
- 2.1.16.3 Any information requested beyond that available by Audit Record Query and/or any witness statements or witness attendance beyond that available in accordance with section 2.1.16.1 of this Security Management Service, Service Description shall be agreed on a case by case basis and shall be dealt with in accordance with the Change Control Procedure.
- 2.1.16.4 Sensitive card data included in records of Banking & Related Services Transactions, shall be extracted by record query and provided to Post Office (but, for the avoidance of doubt, not that included in records for Transactions extracted for Audit Record Queries in respect of any other Business Capability and Support Facility) shall be in the encrypted form in which they are held.
- 2.1.16.5 The Security Management Service shall ensure reasonable access to the audit trail of Banking & Related Services Transactions for Post Office auditors for audit purposes which access shall be by written request and reasonable notice to Fujitsu Services.

2.1.17 Removed by CCN1660a

2.1.18 MANAGEMENT OF SECURITY RISKS

Fujitsu Services has an approved approach to the management of information security risk for POA which is documented in POA Information Risk Management Approach.

Fujitsu Services POA is required to conduct a robust programme of risk management (incorporating risk identification, assessment and mitigation) as a means of determining and confirming the appropriateness of information related security controls for Programme systems and services. The risk management programme is, on a day-to-day basis, undertaken by the Fujitsu Services POA IG staff. Although the options for risk management (i.e. acceptance, transfer, mitigation etc.) are determined by the IG staff and the decision taken by the appropriate Programme or Operational management team, security risk oversight lies with the Information Security Management Review Body (ISMR), which is the highest authority within the Fujitsu Services POA for the management of information security risks.

For the avoidance of doubt, this element of Security Management Service is limited to risks in respect of the HNG-X Application for those elements of the HNG-X System migrated to Post Office Cloud.

2.1.19 REPORTING

2.1.19.1 Monthly Reporting

Information Governance staff provide a monthly Information Security Reporting Pack which informs the Management Team, as an input to the Fujitsu Services POA ISMR, of progress towards ISO27001 compliance, results of audits and current risk status. It is intended that the details contained in this report will expand over time. This includes reports from the Operational Security Team such as a summary of the types and numbers of incidents that may impact on the confidentiality, integrity or availability of POA systems.

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This report, together with report sub-sets contained in the service review book, is provided to the customer on a monthly basis.

For the avoidance of doubt, this element of Security Management Service is limited to reporting in respect of the HNG-X Application for those elements of the HNG-X System migrated to Post Office Cloud.

2.1.19.2 Weekly Reporting

Security operations resources shall provide a weekly report to Post Office detailing the remote access made by the Fujitsu Services support users to RDT and Live Post Office Branch counter systems.

The report will be provided by Fujitsu Services on a weekly basis and consist of the following detail:

- Summary title
- Date and time of access
- Branch code
- Node
- Command Request
- Command Result
- Post Office ServiceNow reference number (where available)
- Rig (i.e. Live or RDT Counters)

Reporting will be carried out 1 week in arrears and will be provided on the first Working Day following the Sunday of each week. The report will be delivered in PDF format, via HORIce, and will show a week's worth of counter access logs for the period Monday to Sunday of the preceding week.

2.2 SERVICE AVAILABILITY

The Security Management Service will be available between 09:00hrs to 17:30hrs Monday to Friday excluding all Bank Holidays. In exceptional circumstances such as Business Continuity or in responding to major security incidents the service will be extended as necessary to support these requirements.

2.3 SERVICE LEVELS AND REMEDIES

2.3.1 GENERAL PRINCIPLES

- 2.3.1.1 The performance of the Security Management Service against the Operational Level Target (OLT) applicable in respect of the relevant Security Management Service shall be measured and reported and success or failure against each shall be judged over the OLT calendar month.
- 2.3.1.2 The values applicable to each of the Security Management Service OLTs are identified within section 2.3.6 of this Security Management Service, Service Description.

2.3.2 SERVICE LEVEL RELIEF

This section is not applicable to the Security Management Service.

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2.3.3 RECTIFICATION PLAN

See paragraph 7.1 of Schedule C1 of the Agreement

2.3.4 SERVICE LEVELS FOR WHICH LIQUIDATED DAMAGES APPLY

There are no specific SLTs applicable to the Security Management Service for which liquidated damages apply.

2.3.5 SERVICE LEVELS FOR WHICH NO LIQUIDATED DAMAGES **APPLY**

There are no specific SLTs applicable to the Security Management Service for which liquidated damages do not apply.

2.3.6 OPERATIONAL LEVEL AGREEMENT

Table 1 describes the OLTs applicable to the Security Management Service.

TABLE 1

	(1) Banking Queries	(2) Limits on Audit Record Queries
	7 Working Days	Period One and Period Two
Target Time		Subject to section 2.4.1, and applicable only in respect of Audit Record Queries, 7 Working Days (for queries of 14 or less days' duration) and 14 Working Days (for queries of greater than 14 days' duration).

2.3.7 PERFORMANCE METRICS

There are no contractual performance metrics applicable to the Security Management Service.

2.3.8 DESIGN TARGETS

There are no design targets applicable to the Security Management Service.

SERVICE LIMITS AND VOLUMETRIC'S

2.4.1 RECORD QUERIES

Table 2 defines the limits on Record Queries, including APOP Voucher Queries which Fujitsu Services shall be obliged to complete.

TABLE 2

(1) Limits on Banking Transaction Record Queries	(2) Limits on Audit Record Queries
Periods One and Two	Period One and Period Two

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Limits	200 per year (on a rolling year basis) with no more than 24 in any calendar month	Subject to section 2.4.1, the limit per year (on a rolling year basis) shall be the first of the following to be reached; (i) 720 Audit Record Queries & APOP Voucher Queries or; (ii) 15,000 Query Days; APOP Voucher Queries being limited to 50 per year (on a rolling year basis) The limit per calendar month, allowing a 'burst rate' of 14% shall be the first of the following to be reached, of which not more than 10 shall be APOP Voucher Queries: (i) 100 Audit Record Queries, or (ii) 2100 Query Days subject to the constraints of the agreed annual limits above.
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- 2.4.1.1 The limits set out in column 1 in Table 2 above and the provisions of this section 2.4.1 of this Security Management Service, Service Description shall apply in connection with the application of those limits.
- 2.4.1.2 The limits set out set out in the column 2 in Table 2 above and the provisions of this section 2.4.1 of this Security Management Service, Service Description shall apply in connection with the application of those limits with effect from the date of commencement of HNG-X Project Workstream X4 (HNG-X Application Roll Out).
- 2.4.1.3 For the purpose of applying the limits in column 2 in Table 2 above from the date of commencement of HNG-X Project Workstream X4 (HNG-X Application Roll Out) the number of queries equivalent to Audit Record Queries (and associated Query Days) that were carried out in the period up to 12 months prior to that date shall be included in calculating whether the annual limit has been reached (on a rolling year basis).
- 2.4.1.4 For the purpose of applying the limits in column 2 in Table 2 to the month in which the HNG-X Project Workstream X4 (HNG-X Application Roll Out) commences, the Audit Record Queries carried out since the commencement of that calendar month shall count towards the limits of Audit Record Queries for that month.

2.4.1.5 Where:

- D. A new Audit Record Query which is received by Fujitsu Services or where Post Office requires analysis of an existing Audit Record Query; and
- E. A member of Fujitsu Services' personnel is needed to deal with that new or existing Audit Record Query; but
- F. That person is unavailable due to his or her attendance at court or other proceedings in connection with an Audit Record Query.
- 2.4.1.6 The target times specified in column 2 to Table 1 shall not apply to that new or existing Audit Record Query which the Security Management Service shall instead deal with as soon as reasonably practicable.
- For the avoidance of doubt, the limits set out in column 1 to Table 2 in respect of 2.4.1.7 Banking Transaction Record Queries shall not apply in respect of reconciliation incident management and settlement reporting carried out as a function of the DRSH.
- 2.4.1.8 Post Office may at any time on three (3) months' written notice vary the aggregate limits of Audit Record Queries which Fujitsu Services is required to carry out as specified in column 2 in Table 2, between:

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- A. The limits specified in Table 2; and
- B. The following substitutes for those limits (applicable on the same basis): 1020 Audit Record Queries or 21250 Query Days per year on a rolling year basis, and a maximum, allowing a 'burst rate' of 14%, of 142 Audit Record Queries or 2975 Query Days per calendar month;

and between:

A. The substitute limits set out above;

and

- The following substitutes for those limits (applicable on the same basis): 1500 Audit Record Queries or 31250 Query Days per year on a rolling year basis, and a maximum, allowing a 'burst rate' of 14%, of 210 Audit Record Queries or 4375 Query Days per calendar month.
- 2.4.1.9 Post Office shall submit Banking Transaction Record Queries to the Security Management Service.

ASSETS AND LICENCES

2.5.1 ASSETS

There are no assets associated with the Security Management Service.

2.5.2 LICENSES

The Security Management Service will ensure that all third party software licences from time to time required by Fujitsu Services to provide the Security Management Service are maintained to ensure they are current and valid for the version of third party software being used at the time. Where a licence or its associated support and maintenance is due to expire, and Fujitsu Services determine that renewal is required, the Security Management Service will ensure that the appropriate renewal process, as defined by the appropriate software vendor or licensor, is completed and a new licence is concluded prior to the expiry date to ensure continuity of the service.

2.6 CHARGES

2.6.1 OPERATIONAL FIXED CHARGES

See Schedule D1 of the Agreement.

2.6.2 OPERATIONAL VARIABLE CHARGE

The Security Management Service operational variable charge is calculated against the number of Branches at a price per Branch as defined in Schedule D1 of the Agreement.

ADDITIONAL OPERATIONAL VARIABLE CHARGE 2.6.3

2.6.3.1 The additional operational variable charge applicable to the Security Management Service is applicable to the number of Audit Record Queries logged as defined in section 2.4.1 of this Security Management Service, Service Description.

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2.6.1.2 Fujitsu Services' charges in respect of dealing with any Audit Record Queries up to the limits set out in section 2.4.1.2 shall be as specified in Schedule D1 of the Agreement.

2.7 DEPENDENCIES AND INTERFACES WITH OTHER OPERATIONAL SERVICES

Any changes agreed between Post Office and Fujitsu Services to the scope or availability of the Security Management Service and/or any of the other Operational Services will be agreed in accordance with the Change Control Procedure. As at the Amendment Date, this Security Management Service interfaces with all of the Operational Services.

2.8 POST OFFICE DEPENDENCIES AND RESPONSIBILITIES

In addition to the generic Post Office responsibilities set out in Schedule A5 of the Agreement, Post Office shall comply with section 2.4.1.8 of this Security Management Service, Service Description.

2.9 BUSINESS CONTINUITY

There are business continuity arrangements set up for the Security Management Service. The facilities are located at a Fujitsu Services location in Stevenage and provide a complete back up service to the Live Operation.

2.10 DOCUMENTATION SET SUPPORTING THE SERVICE

See the document set listed at section 0.4 of this Security Management Service, Service Description. Should any elements of the Security Management Service be changed following agreement with Post Office, Fujitsu Services will ensure these documents are also reviewed and amended where necessary in line with changes agreed.

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