

PAYMENT CARD DATA SECURITY POLICY

As a leading company within the Construction Industry, M J Church recognises the need for Information Technology within the Company in order to carry out its business activities. M J Church recognises that to ensure the most effective running of services, communications and business activities, it will be necessary for certain employees to have access to Payment Card Data. It is the Line Manager's responsibility for the continual monitoring of this usage, and continually assess the position.

M J Church currently uses one standalone, dial out card terminal to process all debit, credit and payment card transactions. The terminal is located at Star Farm and is not connected to any other systems or network within the Company environment.

In processing a card payment, the terminal will print a customer receipt (to be handed to the customer or posted if the cardholder is not present) and a copy receipt which, together with a VAT invoice, is to be processed through the accounts department.

To ensure that M J Church complies with the Payment Card Industry Data Security Standard, the following policies must be adhered to:

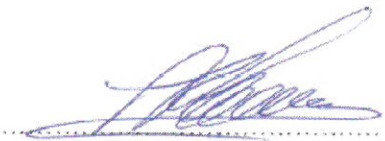
1. No credit, debit or payment card data, card verification codes or personal identification numbers (PIN) are to be uploaded, displayed or stored on any company systems or network, PC's, laptops, external hard drives, flash drives, PDA's or mobile phones, smartphones or tablets.
2. Any card data hand written on paper must be destroyed by shredding as soon as payment is processed via the card terminal. No card data on paper must be left on view at any time on desks etc.
3. No card data is to be sent to anyone via email, instant messaging, or any other electronic means.
4. VAT invoices and associated card terminal receipts must be handed to the Financial Controller (or nominated representative) on the day they are processed through the card terminal. All VAT invoices and associated card terminal receipts must be packed into an envelope clearly marked as being for the attention of the Financial Controller and marked as being private & confidential. During the interim period, they must not be left on view and must be secured in a locked cabinet.
5. Financial Controller (or nominated representative) must ensure that all VAT invoices & card terminal receipts are kept secure in a locked cabinet, both prior to and after processing the VAT invoice through the accounts software.
6. Card terminal receipts must only be kept until such time as the bank reconciliations for each month are complete. After that time all card terminal receipts must be destroyed by cross-cut shredding or incinerated so that cardholder data cannot be reconstructed. Any container where card terminal receipts are stored awaiting destruction must be locked to prevent access to its contents.
7. Until such time as card terminal receipts are destroyed, access to processed VAT invoices and card receipts is limited to the Financial Controller only. In the absence of the Financial Controller, authorisation to view this information must be obtained from a company Director.

8. Under no circumstances are card terminal receipts to be copied or scanned by any means whatsoever, without express authorisation of the cardholder direct for the purposes of supplying a duplicate receipt.
9. No visitors to the M J Church site at Star Farm are to be given access to any areas where the card terminal machine is located or where card terminal receipts are stored.
10. If, for any reason, any employee believes that any card or personal data has been stolen, misused or disclosed to any unauthorised person, this must be immediately reported to the Financial Controller. It is the responsibility of the Financial Controller to immediately contact Lloyds TSB Cardnet to advise that a security event may have occurred.

It is for every manager, employee and persons working on our behalf to promote and encourage compliance with this policy and to respond to any issues or discuss any possible improvements or requirements.

This policy will be periodically reviewed and amended if required, to ensure its effectiveness and the performance monitored.

For & on behalf of M J Church



**S.P. Blower.
Managing Director**

Last reviewed: April 2015