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COMPUTER SYSTEMS AND DATA MANAGEMENT POLICY

Preamble

1. Protecting information confidentiality and data loss is a critical security objective for Cross Country Canada (CCC). It is important for CCC to have security controls, including preventative, detective, and responsive technologies as well as ways of directing and supporting effective and efficient management of information from planning and system development to disposal or long-term preservation.

Policy statement

2. The objective of this policy is to achieve efficient and effective information management to support program and service delivery; foster informed decision making; facilitate accountability, transparency, and collaboration; and preserve and ensure access to information and records for the benefit of present and future generations.

Definitions

3. In this policy:

   a) "Computer system" means all computer related hardware and software and includes, without limitation, all mobile phones, tablets, laptops, and devices capable of storing data.

   b) "CCC computer systems" means all computer systems owned by CCC or used pursuant to an agreement between CCC and a third-party provider (e.g.: Winsport severs), and includes, without limitation, all mobile phones, tablets, laptops, and devices capable of storing data owned by CCC.

   c) "Users" means all users of CCC computer system and users of personal equipment for which CCC pays a technology allowance.

Ownership of Data

3. All data on CCC computer systems is the property of CCC and CCC shall be provided with access thereto.

Privacy

3. **Expectation of Privacy.** The use of passwords to gain access to the computer system or to encode particular files or messages does not imply that users should have an expectation of privacy in the material they create, store, send or receive on the computer system.

4. **Maintenance Monitoring.** CCC has the right to access, inspect, remove or alter all material stored on CCC computer systems without prior notice.

5. **Enforcement Monitoring.** CCC reserves the right to access files and documents residing on CCC's equipment and on personal equipment for which a technology allowance is paid by CCC. CCC has the right, but not the duty, to monitor any or all aspects of CCC computer systems including, but not limited to, monitoring sites visited by users on the Internet, monitoring chat groups and newsgroups, reviewing material downloaded or uploaded by users to the Internet, and reviewing e-mail sent and received by users. Users understand that CCC may use automated software to monitor material created, stored, sent, or received on its computer network.

6. **E-mail Privacy.** Electronic communications are neither private nor secure. E-mail may be stored indefinitely on any number of computers, in addition to that of the sender or recipient. Copies of messages may be forwarded to others either electronically or in hard-copy. E-mail sent to non-existent or incorrect addresses may be delivered to persons never intended to receive the message.

7. **Accuracy.** The content of all communications should be accurate. Users should use the same care in drafting e-mail and other electronic documents as they would for any other written communication. Anything created on the computer may be reviewed by others.

8. **E-mail retention.** Unless directed to the contrary, employees should retain inactive e-mail located in their inbox and sent mailbox no longer than (60) sixty days after receipt. E-mail with non-transitory value should be filed in the appropriate records inventory.

Hardware and Software

9. **Software ownership**. Users shall not move or copy programs or any form of CCC computer system software from one computer to another without prior authorization from the Director of Administration and Communication ("DAC").

10. **Copyright.** Users must adhere to the terms and conditions of all software licences. This includes freeware and shareware that users may obtain directly.

11. **Software control.** Software that is owned by CCC may only be installed on CCC computer systems unless prior permission is obtained from the DAC or the Executive Director of CCC (e.g: for use on computer systems that are used for CCC business).

12. **Antivirus.** All devices accessing the Winsport network, including without limitation CCC computer systems, and personal computer systems, require adequate antivirus protection, as there is the potential of data corruption and user disruption network wide. Should Winsport IT Services or CCC find a computer system that is accessing CCC computer systems or the Winsport network without adequate virus protection (adequacy determined pursuant to CCC or Winsport's sole discretion) , Winsport and/or CCC have the right to refuse of service and/or restrict access until such time the user installs adequate

virus protection software. If assistance is required with the installation of virus protection, Winsport IT Services may assist at their applicable hourly rate (currently $65.00).

Storage and Security of Data

13. **File storage.** Electronic data held on the server in Calgary is held on a shared secure server managed by Winsport. It is the responsibility of any CCC staff person working with or managing any CCC work data to ensure that such data is regularly stored on the shared secure server managed by Winsport and located at the Canada Olympic Park (COP) in Calgary. Windows NT security is implemented to restrict access to only CCC staff as required in the performance of their duties. Security is implemented to restrict access to sensitive information including financial and human resources related material.

14. **Back-up**. CCC currently outsources backup of this data to Winsport. The following data is backed-up daily:

- Shared drive: CCC on 'Fileserve2'
- Restricted financials and HR folders
- E-mails – all email accounts using the cccski.com domain are managed by Winsport and are held on their MS Exchange server in Calgary. Emails on the Exchange server are backed up by Winsport on a nightly basis as well as weekly. The backups are performed in a different building than the mail server.
- Backups of the 'Fileserve2' server at COP in Calgary are stored daily (Monday-Thursday), weekly (every Friday) and monthly at the end of each month.
- Data not stored on the network server (e.g.: remote user data on laptops) is routinely backed up and is the responsibility of that end user to complete and safely store.
- Data stored on blackberries/PDA accessing cccski.com accounts is retained on CODA's exchange server in Calgary, and backed up with emails on Winsport's exchange server (as detailed above).

15. **Restoration of back-up data.** Back-up data may be accessed and/or restored by Winsport. In order to access stored data, a user must submit a ticket to support@winsportcanada.ca to log the issue for assistance. As of the time of last revision of this policy Winsport does not have a disaster recovery plan in place.

Other Permitted and Prohibited Uses

16. **Permitted Uses.** CCC computer systems are the property of CCC and may only be used for purposes approved by CCC. CCC staff and other users approved by CCC are permitted to access computer systems to assist them in the performance of their CCC work related duties. Users shall only use computer resources in a professional, ethical and lawful manner.

17. **Personal Uses.** Reasonable use of CCC computer systems may be allowed by the DAC and the Executive Director of CCC on the condition that such use does not:

a. interfere with performance of the user's work related duties;
b. interfere with the performance of any other user's work related duties;
c. negatively impact on the performance or operation of CCC computer systems;
d. incur cost to CCC;
e. violate any other provision of this policy or any other policy, guideline or standard of CCC.

The DAC or the Executive Director may revoke the privilege of personal use of CCC computer systems at any time.

Staff using computer equipment that is personally owned for CCC related business do so at their own risk. The user is responsible for all maintenance including, but not limited to maintaining adequate antivirus protection, security updates, and maintaining legal copies of software to perform their duties. The user is responsible for ensuring that all data is regularly backed up on the Winsport Server to enable recovery in the event of problems.

18. **Prohibited Uses.** CCC's computer systems shall not be used for the dissemination, storage or viewing of:
a) non-CCC commercial or personal advertisement,
b) non-CCC solicitations,
c) non-CCC promotions,
d) destructive programs (e.g.: viruses and self-replicating code),
e) political material,
f) pornographic material,
g) material that may be damaging to CCC or its reputation,
h) material that may create any potential liability for CCC, or
i) any other illegal, immoral, or disallowed content.