

Computer Systems and Data Management Policy

Policy

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Preamble

- a. Protecting information confidentiality and data loss is a critical security objective for Nordiq Canada. It is important for Nordiq Canada 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

- b. 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

- c. 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) "Nordiq Canada computer systems" means all computer systems owned by Nordiq Canada or used pursuant to an agreement between Nordiq Canada and a third-party provider (e.g.: Winsport servers), and includes, without limitation, all mobile phones, tablets, laptops, and devices capable of storing data owned by Nordiq Canada.
 - c) "Users" means all users of Nordiq Canada computer system and users of personal equipment for which Nordiq Canada pays a technology allowance.

Ownership of Data

- d. All data on Nordiq Canada computer systems is the property of Nordiq Canada and Nordiq Canada shall be provided with access thereto.

Privacy

- e. **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.

- f. **Maintenance Monitoring.** Nordiq Canada has the right to access, inspect, remove or alter all material stored on Nordiq Canada computer systems without prior notice.

- g. **Enforcement Monitoring.** Nordiq Canada reserves the right to access files and documents residing on Nordiq Canada's equipment and on personal equipment for which a technology allowance is paid by Nordiq Canada. Nordiq Canada has the right, but not the duty, to monitor any or all aspects of Nordiq Canada 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 Nordiq Canada may use automated software to monitor material created, stored, sent, or received on its computer network.

- h. **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.
- i. **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.

 - j. **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

- k. **Software ownership.** Users shall not move or copy programs or any form of Nordiq Canada computer system software from one computer to another without prior authorization from the Director of Administration and Communication (“DAC”).

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

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

- n. **Antivirus.** All devices accessing the Winsport network, including without limitation Nordiq Canada 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 Nordiq Canada find a computer system that is accessing Nordiq Canada computer systems or the Winsport network without adequate virus protection (adequacy determined pursuant to Nordiq Canada or Winsport's sole discretion) , Winsport and/or Nordiq Canada have the right to refuse of service and/or restrict access until such time the user installs adequate

Storage and Security of Data

- o. 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 Nordiq Canada staff person working with or managing any Nordiq Canada 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 Nordiq Canada 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.

- p. Back-up.** Nordiq Canada currently outsources backup of this data to Winsport. The following data is backed-up daily:

 - Shared drive: Nordiq Canada on 'Fileserve2'
 - Restricted financials and HR folders
 - E-mails – all email accounts using the Nordiq Canada 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 Nordiq Canada ski.com accounts is retained on CODA's exchange server in Calgary, and backed up with emails on Winsport's exchange server (as detailed above).

- q. **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

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

- s. **Personal Uses.** Reasonable use of Nordiq Canada computer systems may be allowed by the DAC and the Executive Director of Nordiq Canada 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 Nordiq Canada computer systems;
 - d. incur cost to Nordiq Canada;
 - e. violate any other provision of this policy or any other policy, guideline or standard of Nordiq Canada.

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

Staff using computer equipment that is personally owned for Nordiq Canada 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.

- t. **Prohibited Uses.** Nordiq Canada's computer systems shall not be used for the dissemination, storage or viewing of:
 - u. non- Nordiq Canada commercial or personal advertisement,
 - v. non- Nordiq Canada solicitations,
 - w. non- Nordiq Canada promotions,
 - x. destructive programs (e.g.: viruses and self-replicating code),
 - y. political material,
 - z. pornographic material,
 - aa. material that may be damaging to Nordiq Canada or its reputation,
 - bb. material that may create any potential liability for Nordiq Canada, or
 - cc. any other illegal, immoral, or disallowed content.