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Approved By:	Policy & Ethics Committee

ENTERPRISE INFORMATION MANAGEMENT POLICY

PURPOSE

Good governance of our corporate information ensures that legal and operational needs of the organization are met; that the system established and maintained to meet these objectives is efficient and effective; and that all employees understand their responsibilities. Information assets critical to conducting business at ATC must be managed in a compliant, consistent, and auditable manner.

The Enterprise Information Management (EIM) Program provides an efficient, effective, and standardized approach to the creation, maintenance, use, and disposition of ATC information.

The program:

- Provides management controls to properly retain records for business and compliance requirements
- Provides a method to identify business information for efficient access and retrieval
- Protects confidential, privileged, and vital information
- Outlines procedures to suspend destruction of records in the ordinary course of business, as may be required due to litigation, government investigation, or audit
- Educates and supports employees in the implementation of ATC's information management policies and procedures

SCOPE

The scope of this policy encompasses all enterprise information produced or received by ATC employees or contractors.

DEFINITIONS

Enterprise Information – Data or documents that are used to support ATC business activities.

File Plan – Index of information types and the information management requirements for each.

Information Custodian – An ATC employee who has management accountability for a particular type of information. Information Custodians are identified by title (usually a team leader, manager, director, or executive). Each type of information can have only one Information Custodian, although many departments may be involved in the creation and use of the information.

Information User – All (internal and external) users of ATC information.

EIM Principles – The EIM program is based on the "Generally Accepted Recordkeeping Principles" developed by ARMA International. The principles are accountability, transparency, integrity, protection, compliance, availability, retention, and disposition.

RESPONSIBILITIES

Program Sponsor is responsible for overseeing the EIM program and delegating program responsibility to appropriate individuals.

EIM Program Manager is responsible for management of the File Plan, retention schedule, off site file storage, information management awareness, repository assessments, and information management standards development.

Information Custodians are responsible for ensuring that the File Plan is kept current with the management rules for the types of information for which they are accountable.

Information Users are responsible for reviewing information management requirements prior to acting on information they create or receive.

For guidance on information management responsibilities, refer to the procedures, standards and guides found on the EIM Program site in SharePoint.

Address any questions to EIM@atcllc.com.

REPORTING

It is the responsibility of all ATC employees to report any suspected violations of this policy, in accordance with ATC's Open Door Policy.

EXCEPTIONS/VIOLATIONS

Exceptions to this policy require the approval of the Policy Owner(s) listed above.

Employees who violate this policy are subject to disciplinary action, up to and including termination.