



Policy Owners:	Chief Financial Officer and Corporate Secretary
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ENTERPRISE INFORMATION MANAGEMENT POLICY

PURPOSE

The purpose of this policy is to set expectations regarding employee management of ATC information. Good governance of our corporate information supports the regulatory, legal and operational needs of the organization.

SCOPE

This policy applies to all ATC Enterprise Information, as defined below.

DEFINITIONS

Confidential Information – Information that is not intended for dissemination to the general public and that presents a considerable risk to the organization if a security breach occurs or information is misused.

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

File Plan – Index of information types and the associated information management requirements, which is integrated with the ATC record retention schedule.

Information Custodian – An ATC employee who has management accountability for a particular type of Enterprise 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.

RESPONSIBILITIES

ATC employees are responsible for:

- Managing Enterprise Information in a manner that follows the file plans, standards and procedures established by the Enterprise Information Management team (located [here](#))
- Managing Enterprise Information in a manner that complies with applicable laws, regulations, court orders or litigation holds

- Ensuring appropriate confidentiality protections are in place prior to sharing sensitive Enterprise Information (Confidential and/or non-public) via non-disclosure, confidentiality or other agreement governing the appropriate treatment and handling of such information
- Ensuring the File Plan is kept current for areas of accountability (*Information Custodians only*)
- Consulting the [Enterprise Information Management team](#), should questions arise on the proper treatment or classification of Enterprise Information.

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 Owners listed above.

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