



Policy Name:	Enterprise Information Management (EIM) Policy
Policy Owners:	VP Enterprise Technology, Information and Security; and Corporate Secretary
Effective Date:	5/1/2023

PURPOSE

The purpose of this policy is to set expectations regarding the 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

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.

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](#).
- Following [standards and procedures](#) established by the EIM team.
- Managing Enterprise Information in a manner that complies with applicable laws, regulations, court orders or litigation holds.
- Ensuring appropriate protections are in place prior to sharing Enterprise Information. (Includes non-disclosure agreements or other agreements governing the appropriate treatment and handling of such information, appropriate confidentiality labeling, and protection methods such as access rights and encryption).
- Ensuring the File Plan is kept current for areas of accountability (Information Custodians only)
- Ensuring those who report to them (either through a leadership role or as sponsor of a Contingent Worker, if applicable) are aware of and comply with the requirements described in this policy.
- 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.