

## **P2008 - Information Security Policy**

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## **Purpose:**

The Information Security Policy provides a structure for developing an organization-wide information security program comprised of a set of policies, standards, and practices that serve as the basis to assure information security for Integrity Marketing Group (“Integrity”) and all of its Business Units. The Information Security Policy at Integrity defines the fundamental principles for the protection of information resources and the proper controls needed to ensure compliance with internal and external regulations to uphold Integrity’s security posture and reputation.

The Information Security Policy states Integrity’s responsibility for securing information assets and its delegation of that responsibility to Integrity’s Business Units. The Information Security Policy and program reflects Integrity’s commitment to protect the confidentiality, integrity and availability of information assets.

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## **Scope:**

The concepts, policies, standards and initiatives within Integrity’s Information Security Policy apply to Integrity and all of its Business Units. Each Business Unit must comply with the organization-wide information security program, associated policies, and standards as reviewed, approved and signed by the Vice President of Technology at Integrity.

All Integrity employees and contractors are responsible for the security and protection of electronic information resources over which they have control. Resources to be protected include, and are not limited to: networks, computers, software, and data. The physical and logical integrity of these resources must be protected against threats such as unauthorized intrusions, malicious misuse, or inadvertent compromise.

Integrity and its Business Units are able to develop more stringent local policies and standards that address specific local issues. Business Units may develop policies and procedures tailored to their environment that address areas not covered by organization-wide policies. If a Business Unit chooses to keep or develop information security policies or procedures of its own, those policies and standards are valid to the extent that they are more stringent than the requirements contained in the Integrity policies and standards, which constitute the mandatory baseline.

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## **Statement:**

All employees, contractors, and temporary or part-time workers, are responsible for ensuring that Integrity’s information assets are used only in proper pursuit of the organization’s operations; information is not improperly disclosed, modified, or endangered; and access to Integrity information resources is not made available to unauthorized personnel.

The Information Technology teams, and site leadership at each Integrity Business Unit, are responsible for following and enforcing the appropriate security controls as determined by Integrity Marketing IT. Business Unit IT Teams must evaluate all stored information, applications, and information systems to ensure compliance with the appropriate controls required to protect the information asset on the basis of its value to Integrity.

The Integrity Information Security Policy is intended to be a living document that must be periodically updated in order to maintain alignment with relevant developments around cybersecurity threats, risks, and compliance matters faced by the organization.

## Policy Sections:

### Section A: Roles and Responsibilities

**Section Name:** Roles & Responsibilities

**Statement:**

| Role                               | Job Functions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Responsibilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| Chief Technology Officer           | <ol style="list-style-type: none"> <li>1. Responsible for the overall planning, coordination and execution of the Information Technology functions across Integrity and its Business Units.</li> <li>2. Oversees the operation, maintenance, and availability of Integrity's IT infrastructure and associated services.</li> <li>3. In collaboration with the CISO, protects Integrity information and infrastructure from external or internal threats and assures that Integrity complies with applicable statutory and regulatory requirements.</li> </ol> | <ul style="list-style-type: none"> <li>• Lead the overall strategic planning, budget and decision management processes related to Information Technology and ensure it aligns with Integrity's business mission.</li> <li>• Oversee the IT on-boarding process for new Business Units including installation and configuration of new information technology equipment.</li> <li>• As an IRT ( Incident Response Team) member, primarily responsible for recommending policy and technology changes after any security incident.</li> </ul> |
| Chief Information Security Officer | <ol style="list-style-type: none"> <li>1. Assumes the role of Risk Manager as it relates to Information Security Risk. At the Administration or Business Unit levels, manages, develops, and</li> </ol>                                                                                                                                                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>• Overseeing the overall security risk management across Integrity and ensuring that the information security program is established and</li> </ul>                                                                                                                                                                                                                                                                                                                                                  |

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|                    | <p>implements risk management programs, policies, and procedures appropriate to the organization.</p> <p>2. Ensures continuity of information security program efforts with the Chief Privacy Officer.</p> <p>3. Maintains overall responsibility for developing and delivering a comprehensive information security program that complements and supports relating privacy and regulatory programs and requirements</p> <p>4. Leads Integrity's information security activities including security monitoring, vulnerability management, risk management, and incident response to support Integrity's Information Security program.</p> | <p>aligned with the mission and vision of Integrity and its Business Units.</p> <ul style="list-style-type: none"> <li>• Serving as the Information Security representative to the Executive Leadership team and interacting with Senior and Executive Leadership on information security matters.</li> <li>• Ensuring enforcement of Information Security policies at Integrity and its Business Units.</li> <li>• Establishing processes to measure Information Security risk and periodically reporting risk to the Information Security Governance Committee.</li> <li>• Leading the overall strategic planning and decision management processes related to Information Security Policy Development.</li> <li>• Conducting site visits as a risk manager, analyzing risks, and updating and maintaining the risk register to continuously improve processes.</li> <li>• Leading the incident response program, including reviewing and updating the incident response plan and leading the Incident Response Team in incident response scenarios</li> </ul> |
| Compliance Officer | Manage the implementation of,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <ul style="list-style-type: none"> <li>• Managing the</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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|                                           | and compliance with, Integrity Marketing Group's Privacy Policies and Procedures that provide guidance for the protection and safeguarding of all data classified as Regulated in the organization's Data Classification and Retention Policy. | <p>implementation of, and compliance with, Integrity's Privacy Policies and Procedures that provide guidance for the protection and safeguarding of all data classified as Regulated in Integrity's Data Classification and Retention Policy.</p> <ul style="list-style-type: none"> <li>• Overseeing the development, implementation, and oversight of privacy and compliance related programs.</li> <li>• Serving as the compliance and privacy representative to the Executive Leadership team and interacting with Senior and Executive Leadership on compliance and privacy matters.</li> <li>• Receiving, documenting, and responding to requests, complaints, and reports of alleged violations related to privacy.</li> <li>• Providing guidance and information about privacy-related matters to employees and stakeholders.</li> </ul> |
| Information Security Governance Committee | 1. Facilitate making organization-wide, datadriven decisions regarding development,                                                                                                                                                            | <ul style="list-style-type: none"> <li>• Executing the information security program, including authorization of decisions regarding access, usage</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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|                     | <p>maintenance, and enforcement of Information Security Policies.</p> <p>2. Develop and foster a culture of information literacy and sharing across all Business Units, thereby enabling users to make informed decisions.</p> | <p>and risk levels associated with data across Integrity.</p> <ul style="list-style-type: none"> <li>• Developing and providing a framework that allows all key security decisions to be reviewed by key stakeholders.</li> <li>• Developing a security improvement roadmap based on inputs from more focused security teams.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                 |
| Compliance Deputies | Responsible for updating and coordinating privacy compliance at each of Integrity Marketing Group's Business Units.                                                                                                            | <ul style="list-style-type: none"> <li>• Assuming the role of Compliance Officer delegate in day-to-day operations of managing privacy and compliance programs at a Business Unit.</li> <li>• Contributing to the oversight of privacy related policies and procedures at the applicable Business Unit.</li> <li>• Receiving, documenting, and responding to requests, complaints, and reports of alleged violations related to privacy at the Business Unit.</li> <li>• Providing guidance and information about privacy-related matters to employees and stakeholders at the Business Unit.</li> <li>• Coordinating with the Compliance Officer to maintain Integrity's overall compliance.</li> </ul> |
| Integrity IT Team   | Perform security operations,                                                                                                                                                                                                   | As leader of a team or individual                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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|                        | information security threat analysis, and tools maintenance.                                                                                                                                                                                                                                                                                                                                                                                        | <p>performer:</p> <ul style="list-style-type: none"> <li>• Provide guidance to the Business Units to meet or maintain compliance with applicable policies, standards, baselines, guidelines, and laws.</li> <li>• Ensure security program operations and controls are being consistently performed or applied • Establishes procedures to oversee the acquisition of supplies and equipment schedules.</li> <li>• Assess requirements for updates to security plans based on changes to business functions, technical vulnerabilities, and emerging threats.</li> </ul> |
| Business Unit IT Teams | <ol style="list-style-type: none"> <li>1. Manages the operation of an information technology unit or area including computer hardware, software, networking, and telecommunications equipment.</li> <li>2. Plans, organizes, and controls all aspects of the operation including supervision of respective Business Unit staff, prioritizing and assigning of the work, and coordinating activities with other Integrity Business Units.</li> </ol> | <ul style="list-style-type: none"> <li>• Provides technical support for all hardware and systems within the Business Unit.</li> <li>• Recommends hardware acquisitions, the acquisition and maintenance of support equipment, and the contracting and procurement of new equipment and software for Integrity IT team approval.</li> </ul>                                                                                                                                                                                                                              |



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**Policy References:**

| Document Name                  | Category                      | Document Author    | Document Owner     |
|--------------------------------|-------------------------------|--------------------|--------------------|
| P2002 - Asset Management       | 2000 - Information Technology | Jeremy Hart        | Matthew R Williams |
| P2012 - Risk Management Policy | 2000 - Information Technology | Matthew R Williams | Matthew R Williams |

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