



A Member of Trinity Health

INFORMATION SECURITY
INFORMATION SERVICES POLICY NO. 1

POLICY

It is the policy of Trinity Health to recognize information is a vital asset and that the preservation of the confidentiality, integrity, and availability of information is essential to the success of Trinity Health. As with other assets, there is a need for a policy and procedures that properly safeguard the access and use of information within Trinity Health.

PROCEDURES

Enterprise Information Security shall be responsible for maintaining Procedures to protect the security of information and mitigate damages resulting from, but not limited to, unauthorized access, disclosure, duplication, modification, appropriation, destruction, loss, misuse, and denial of use, whether accidental or intentional. Procedures will include processes and steps to identify, protect, detect, respond and recover from information security risks and incidents modeled on the National Institute of Standards and Technology (NIST) cybersecurity framework. Specifically, Procedures will address information security in the following categories:

- Acceptable Use;
- Organization of Information Security;
- Information Security Risk Management;
- Asset Management;
- Access Control;
- Operations Management;
- Information Security Incident Management;
- Physical Security;
- Business Continuity Management; and
- Information Security Compliance.

Each User has a responsibility to assure the security of the information and to use it in an authorized manner. Every User of Trinity Health Information - no matter their status (employee, contractor, consultant, medical staff, temporary, etc.) must comply with Enterprise Information Security Policies and Procedures posted by Trinity Health. Any unauthorized use of Trinity Health Information is grounds for disciplinary action and referral to law enforcement agencies for civil and/or criminal action, where appropriate.

SCOPE/APPLICABILITY

This Policy and the associated Information Security Procedures are intended to apply to Trinity Health, its Ministries, Subsidiaries and all Users of Trinity Health Information.

This Policy applies to information that is collected, stored or shared via any means, including electronic information, audio recordings, information on paper, and information shared orally or visually (such as telephone, fax, or video conferencing). Further, this Policy applies to all computer and network systems owned by and/or managed by Trinity Health and all platforms (operating systems), all computer sizes (such as mobile devices, personal computers, servers, etc.), and all application systems (whether developed or hosted on premises or by Third Parties).

DEFINITIONS

Executive Leadership Team (“ELT”) means the group that is composed of the highest level of management at Trinity Health.

Ministry means a first tier (direct) subsidiary, affiliate, or operating division of Trinity Health that maintains a governing body that has day-to-day management oversight of a designated portion of Trinity Health System operations. A ministry may be based on a geographic market or dedication to a service line or business. Ministries include Mission Health Ministries, National Health Ministries, and Regional Health Ministries.

National Institute of Standards and Technology (“NIST”) means the unit of the U.S. Commerce Department that develops and maintains standards for information technology and cybersecurity.

Policy means a statement of high-level direction on matters of strategic importance to Trinity Health, or a statement that further interprets Trinity Health’s governing documents. Policies may be either stand alone or Mirror Policies designated by the approving body.

Procedure means a document designed to implement a policy or a description of specific required actions or processes.

Subsidiary means a legal entity in which a Trinity Health Ministry is the sole corporate member or sole shareholder.

Third Party means an external entity with whom Trinity Health has a relationship. External entities may include, for example, service providers, vendors, supply-side partners, demand-side partners, alliances, consortiums, and investors, and may include both contractual and non-contractual parties.

Trinity Health Information means data or a record in paper or electronic form that contains information classified as unclassified, internal, confidential, or PHI confidential.

User means an individual who has been granted explicit permissions to access, modify, delete, and/or utilize Trinity Health information, including both internal Users and external Users.

RESPONSIBLE DEPARTMENT

Further guidance concerning this Policy may be obtained from the Enterprise Information Security Department.

RELATED PROCEDURES AND OTHER MATERIALS

- Information Security Procedure No. 1.1 – Acceptable Use
- Information Security Procedure No. 1.2 – Organization of Information Security
- Information Security Procedure No. 1.3 – Information Security Risk Management
- Information Security Procedure No. 1.4 – Asset Management
- Information Security Procedure No. 1.5 – Access Control
- Information Security Procedure No. 1.6 – Operations Management
- Information Security Procedure No. 1.7 – Security Incident Management
- Information Security Procedure No. 1.8 – Physical Security
- Information Security Procedure No. 1.9 – Business Continuity Management
- Information Security Procedure No. 1.10 – Information Security Compliance
- Information Security Control Alignment Matrix

APPROVALS

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