

Policy Number:	PRIV-1-7
Policy Name:	Security in Contracting
Issued:	02.2025
Revised:	
Applies to:	E

PREFACE

McMan South Region (referred to as “McMan”) has business, ethical and legal responsibilities to protect all forms of personal information and personal employee information in its custody and/or control.

The purpose of this policy is to ensure appropriate information management and security practices by third parties contracted to provide service to, or on behalf of, McMan (e.g., contractors, consultants, support service providers or business partners).

This document should be read in conjunction with McMan’s Privacy Charter and all of the related policies and procedures referenced therein.

POLICY

1. McMan ensures contracted service providers (e.g., contractors, consultants, support service providers or business partners) comply with McMan’s privacy and security policies.
1. An agreement or contract is completed and signed between McMan and all contracted service providers that require access to the information systems and assets of McMan.
2. Until a contract detailing explicit information security provisions has been executed, the contracted service provider is not given access to premises or systems containing confidential business or personal information in the custody or control of McMan.
3. Information security provisions outlined in contracts with contracted service providers meet or exceed the standards set out in the information security policies and procedures. Any related contracted service provider information security and privacy policies should be made available to McMan upon request, including any updates or revisions that occur after execution of the contract.
2. All employees of contracted service providers who have exposure to and use McMan information assets and systems sign a Confidentiality (non-disclosure) Oath (See Appendix 4 Confidentiality Agreement). Contracted service providers should remind their employees on termination of their continued responsibility to maintain the confidentiality of McMan information.
4. Contracted service providers immediately report breaches of confidentiality and privacy to the McMan Privacy Officer.
3. Contracts with service providers that have access to McMan information assets and systems include provisions that protect McMan operations from circumstances where the information assets or systems may be compromised. In order to mitigate these situations, disaster recovery and system backup is included in all agreements, to a standard that meets or exceeds that of McMan.

5. Contracts with service providers include provisions for destroying or returning all McMan information assets, including hardware, system documentation and information assets upon termination of agreements and in accordance with contract provisions reflecting records retention and data management policy.
6. To ensure compliance with contracted provisions for information security, McMan:
 - a. Requests contractors sign an acknowledgement that they have received, read, and will comply with any McMan information security policies they are bound to follow under contract; and
 - b. Actively monitors contracted service providers with access to information assets or systems for inappropriate access or use and to ensure compliance with contract security provisions.
7. Whenever possible, McMan retains the right to inspect the premises and security practices of contracted service providers without notice. McMan will review security practices of contract service providers to ensure compliance with contract provisions and stated policies.
8. McMan avoids using contracted service providers that require the storage or transmission of personal information outside of Canada. If they are retained, McMan ensures that they meet the same standards of security and compliance that are required of Canadian service providers, in order to fulfill the FOIP Act's requirement to prevent unauthorized collection, use, access, retention, destruction and disclosure of personal information.

APPENDICES

Appendix 4 - Confidentiality Agreement