

The University is responsible for ensuring that third-party vendors demonstrate adequate internal controls to safeguard its information and IT Resources that vendors access or manage on behalf of the University, and that the service level agreements are satisfied and maintained.

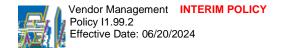
This policy establishes the expectations and guidelines for managing third-party vendor services and provides the code of conduct that vendors must comply with throughout their engagement with the University.

All employees who are responsible for the procurement and management of third-party vendor solutions and services and third-party vendors who provide these services and solutions.

Third-party vendors: individuals or organizations who provide solutions and services to the University.

University Departments

University departments shall ensure that all vendors who provide IT software, equipment, and services have



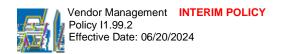
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Director of Procurement

Responsible Offices: University Technology Services and

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- a. Vendor name and contact details;
- b. Service provided to the University;
- c. The data they hold, process, or transmit;
- d. Contact information, if applicable.
- C. Data Sharing and Processing Agreements and Subcontracting
 - 1. Contracts with vendors that process University data shall include appropriate data privacy, sharing, and processing clauses. These clauses must be agreed upon before finalizing the contracts.
 - 2. University data held or processed by vendors shall be adequately protected from data breaches.
 - 3. Third-party vendors are expected to have undertaken their due diligence on their sub-contractors.
- D. Third-Party Audit and Performance Review
 - 1. User Departments shall review all service-level agreements for each vendor periodically (as deemed necessary) to ensure the requirements and expectations of the agreements are satisfied.
- E. Third-Party Vendor Security Incident Management
 - 1. Third-party vendors shall have a security incident management process in place.
 - 2. Third-party vendor security incidents impacting the University must be reported to the University per the contractual arrangement.
 - 3. Third-



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advertisements) shall not be made without prior written University approval, and then only by explicit written instructions from the University.

All University employees will adhere to the procedural directives outlined in the Regulations section of this policy.

Northwestern University Vendor Code of Conduct

University of Greenwich Policy for Third-Party Supplier Security

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Procurement Policies and Standard Procedures

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