

Department:	CMC- IT-ADHICS- 012
Issue Date:	01/07/2020
Revision Date:	01/07/2022
Next Revision Date:	01/07/2022
Version :	01

COMPLIANCE POLICY

1. PURPOSE

- 1.1 To define the process and guidelines to be followed, for the purpose of implementing the statutory and regulatory contractual requirements of Canadian Medical Center related to information security.
- 1.2 To comply with the applicable UAE laws, Intellectual Property Rights (IPR), contractual obligations with vendors and contractors.

2. POLICY STATEMENT:

- 2.1 This Policy document shall be made available to all the employees covered in the scope, to ensure compliance risks are identified, and adequately mitigated.

3. SCOPE:

- 3.1 All Canadian Medical Center Group of Companies Staff for the following :

- 3.1.1 Canadian Medical Center LLC
- 3.1.2 Canadian Medical Center LLC Branch -2
- 3.1.3 Canadian Medical Center LLC Branch - 3
- 3.1.4 Canadian Medical & Rehabilitation Center LLC
- 3.1.5 CMC First Aid Clinic

4. TARGET AUDIENCE:

- 4.1 This policy applies to all Users of Canadian Medical Center and group of facilities

5. RESPONSIBILITY

- 6.1 The Information Technology Department is responsible for development, maintenance, enforcement and endorsement of the policy.
- 6.2 The Information Technology Department is responsible to support the relevant business unit / section in implementation of the defined controls and ensuring compliance with this policy.
- 6.3 All Users are responsible to read, understand and adhere to this policy in their day-to-day activities.
- 6.4 Top management is responsible for compliance to this policy within their area(s) of concern.

6. PROCEDURE:

6.1 Identification of Applicable Legislation

- 6.1.1 Based on the risk assessment, IT Department shall identify list of legal and regulatory laws pertaining to information security that are applicable to the Entity.
- 6.1.2 List of applicable statutory and regulatory requirements pertaining to information shall be documented and approved by the top management.
- 6.1.3 Higher Management or legal Department shall ensure that adequate clauses in relation to information Security are considered in the standard contract templates used in Canadian Medical Center.

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6.1.4 The contractual clauses may also include the following minimum controls, based on the criticality of the contract:

6.1.4.1 Compliance with legal and regulatory requirements.

6.1.4.2 Compliance with Intellectual property rights requirements.

6.1.4.3 Compliance with information security policies and procedures

6.1.4.4 Clear allocation of responsibilities to all the involved parties.

6.1.4.5 Statement on Non – Disclosure of information

6.1.4.6 Canadian Medical Center rights to review and audit the compliance with the contracts

6.1.4.7 Adequate Service Level Agreements (SLA), where applicable.

6.1.5 Canadian Medical Center contract templates shall be reviewed by IT Department to ensure inclusion of information security requirements as mentioned in the above point.

6.1.6 IT Department shall ensure that proper information security controls are implemented to comply with statutory and regulatory requirements applicable to Canadian Medical Center and group facilities.

6.2 Intellectual Property Rights

6.2.1 Canadian Medical Center facilities shall ensure compliance with the Intellectual Property Rights through implementing the following controls:

6.2.2 Ensuring that software installed and used in Canadian Medical Center & group systems are strictly in accordance with the applicable licenses conditions.

6.2.3 Conducting periodic information security awareness to Canadian Medical Center's Users on the importance of protecting Canadian Medical Center IPR as well as any external party IPR, and the risk implication of using pirated or unlicensed software on Canadian Medical Center facilities systems.

6.2.4 Maintaining records and evidence of procurement and ownership of software licenses.

6.2.5 Maintaining an Inventory of all Canadian Medical Center & Group assets and identifying the requirements to protect IP rights.

6.2.6 Ensuring the usage and inclusion of copyright markings and disclaimer over owned documents or materials, or any other type of written information, in order to present Canadian Medical Center copyright status to the Users or readers of such information.

7. DEFINITIONS AND ABBREVIATIONS:

SI No	TERMS	DEFINITIONS AND ABBREVIATIONS
7.1	Compliance	Compliance is defined as the adherence to laws, including the spirit of the law, regulations, generally accepted practices, standards, and financial industry codes of conduct
7.2	CMC facilities	Licensed facilities in Abu Dhabi where ADHICS standards are applicable:

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		Canadian Medical Center LLC Canadian Medical Center LLC Branch -2 Canadian Medical Center LLC Branch - 3 Canadian Medical & Rehabilitation Center LLC CMC First Aid Clinic
7.3	ADHICS	Abu Dhabi healthcare information and cyber security standards

8. DISTRIBUTION LIST:

On shareholder Policies IT

9. SPECIAL INSTRUCTIONS:

- 9.1 Any violation or breach to the policy may be subject to HR disciplinary procedure in accordance with the Code of Conduct for Employees and any other applicable UAE Laws in this regard.
- 9.2 Any employee found to have violated this policy may be subjected to disciplinary action in line with Disciplinary code policy.
- 9.3 If Users are unsure or not clear of anything in this policy, they should seek clarification or advice from IT Department.
- 9.4 The IT Department reserves the right to check the compliance of this policy as & when required.
- 9.5 Any exceptions to this policy with valid business justification require approval from IT Manager on a case-to-case basis.

10. CROSS REFERENCE, RELATED LEGISLATION, FORMS, POLICY & DOCUMENTS:

- 10.1 Guidelines for the implementation of the Abu Dhabi healthcare information and cyber security standard (ADHICS) 2019 ADHICS-Implementation-Guidelines
- 10.2 Code of conduct Canadian Medical Center & Group: CMC-HR-006

11. KEY RESULT AREAS:

- 11.1 The procedure is fully implemented if there are nil incidences of non-compliance with this policy.

12. AMENDMENT HISTORY:

Version	Revision Date	Description of Amendments	All pages
01	01/07/2020	New policy	All pages

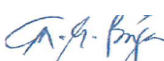
13. APPENDIX:

NA

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14. APPROVALS:

Document Developed By:			
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