

Department:	Administration/IT
Document Reference Number	CMC- IT-ADHICS- 002
Issue Date:	01/07/2020
Review Date:	01/05/2021
Next Revision Date:	01/05/2023

ASSETS MANAGEMENT POLICY

1. PURPOSE

- 1.1 The regulatory structure surrounding nearly every facet of the healthcare operations, from protecting patient data and improving health outcomes, to reporting on compliance-related issues, necessitates healthcare entities to monitor and record the use of information assets.
- 1.2 Information assets include information/data in all its form, as well as the underlying application, technology, and physical infrastructure to support its processing, storing, communicating and sharing.
- 1.3 The following are considered information assets:
 - 1.3.1 Information (in physical and digital forms)
 - 1.3.2 Medical device and equipment
 - 1.3.3 Applications and Software
 - 1.3.4 Information System
 - 1.3.5 Physical Infrastructure (Data centre, access barriers, electrical facilities, HVAC systems, etc.)
 - 1.3.6 Human resources (in support of care delivery)

2. POLICY STATEMENT:

- 2.1 Canadian Medical Center Group of Companies understands the importance of identifying, recording and classifying our assets and utilizes an Information Asset Register (IAR) to retain a complete list of all current assets, their location, value, access and other vital data.
- 2.2 Canadian Medical Center facilities have the responsibility to manage our physical and information assets, stemming from various legal, regulatory, contractual and business obligations: -
 - 2.2.1 General Data Protection Regulation (GDPR)
 - 2.2.2 Contractual (client agreements, business objectives etc.)
 - 2.2.3 Security Requirements (e.g. encryption, backups, updates etc.)
 - 2.2.4 Equipment Management (service, replacement, disposal)
- 2.3 Canadian Medical Center Group of Companies ensures that all assets used and retained during business, are properly documented, are assigned an owner and are subject this policy and subsequent procedures. Managing our assets is paramount to the continuity of our core business and to Canadian Medical Center Group of Companies reputation. Assets are protected where applicable, further aiding in the protection of personal information and confidential data.
- 2.4 Canadian Medical Center & Group of facilities will exclude the below scope as it is maintained and managed under school clinics or as per university regulations.
 - 2.4.1 Applications and Software
 - 2.4.2 Information System
 - 2.4.3 Physical Infrastructure (Data centre, access barriers, electrical facilities, HVAC systems, etc.)

3. SCOPE:

Department:	Administration/IT
Document Reference Number	CMC- IT-ADHICS- 002
Issue Date:	01/07/2020
Review Date:	01/05/2021
Next Revision Date:	01/05/2023

ASSETS MANAGEMENT POLICY

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
- 3.1.6 CMC Healthcare L L C – SOLE PROPRIETORSHIP L.L.C.

4. TARGET AUDIENCE

4.1 This policy applies to all Users of Canadian Medical Center Group of Companies. The scope includes all information assets owned and managed by CMC management.

5. RESPONSIBILITY

- 5.1 Canadian Medical Center Group of Companies Information Technology Department responsible for development, maintenance, enforcement and endorsement of the policy.
- 5.2 Canadian Medical Center Group of Companies Information Technology Department is responsible in implementation of the defined controls and ensuring compliance with this policy.
- 5.3 All Canadian Medical Center Group of Companies Users are responsible to read, understand and adhere to this policy in their day-to-day activities.
- 5.4 The Canadian Medical Center Group of Companies Information Technology Department is responsible to conduct awareness about the policy to Users.
- 5.5 Higher Management Executive Committee & ADHICS Steering Committee are responsible for compliance to this policy within their area(s) of concern.
- 5.6 All information assets owners are responsible for ensuring that this policy is complying within their area of work.

6. PROCEDURE:

6.1 Information Assets Management

- 6.1.1 All information assets shall be identified, recorded and maintained through an information asset inventory.
- 6.1.2 The asset inventory shall be reviewed and updated on regular basis and as and when there is any major organizational restructure.
- 6.1.3 All information assets shall have the following defined & documented: Owner/Author of information.
 - 6.1.3.1 Custodian of information.
 - 6.1.3.2 Distribution list/Access control list.

6.2 Information Assets Classification Guidelines

- 6.2.1 The owners of the information assets shall be responsible for assigning/maintaining appropriate classifications based on the following criteria:
- 6.2.2 Value of content/information it holds or carries.
- 6.2.3 Intended Users of the information.
- 6.2.4 Resulted risk impact if the information was accessed by unauthorized individuals.

6.3 Assets Classification Categories

Department:	Administration/IT
Document Reference Number	CMC- IT-ADHICS- 002
Issue Date:	01/07/2020
Review Date:	01/05/2021
Next Revision Date:	01/05/2023

ASSETS MANAGEMENT POLICY

6.3.1 Information assets of Canadian Medical Center facilities shall be classified into one of the following classifications.

6.3.1.1 The classification is wholly based on the examination of the value of the information, who will have access to the information assets, and the resulted risk impact if the information was compromised or accessed by unauthorized individuals.

CLASSIFICATION CATEGORY	DESCRIPTION	RISK IMPACT	EXAMPLES
Secret •Secret/سري 	Information that requires substantial and multilevel protection due to its highly sensitive nature. Disclosure of such information could have a serious and sustained impact upon the government, national security, social cohesion, economic viability and health of the country. Information disclosure could potentially threaten life or seriously prejudice public order.	The compromise of information in this category could result in serious damage Canadian Medical Center facilities financial status, of reputation of, customers trust, critical systems operations of legal implication etc.,	VIP health information, Critical health information, Credit Card Details, IP addresses, Network and Infrastructure Diagrams, etc.
Confidential •Confidential/سري 	Information that requires robust protection due to its critical support to decision-making within the Entity, and across health sector and government. Information that could disclose designs, configurations or vulnerabilities exploitable by those with malicious intent. Information that the Entity, or through government or regulatory mandates, has a duty of care to others to hold in safe custody (e.g., critical personal information, health/healthcare information, government information, financial information etc.).	The compromise of information in this category could result in damage to Canadian Medical Center facilities competitive advantage, strategic operational plans, government relations, legal binding.	Strategic/Critical Projects Contracts, payroll data, employee private records (medical records), audit reports, risks registers, assets registers, financial details in relation to projects or proposals, strategic/critical projects RFPs, Information Security Incident Reports etc.
Restricted •Restricted/محظور 	Information that must be afforded limited confidentiality protection due to its use in the day-to-day operations. Disclosure of such information could have limited adverse impact on the functioning or reputation of. Canadian Medical	Disclosure of such information with unauthorized individuals could result in undesirable effect or minimal impact on Canadian	External Government Correspondences, Policies, Procedures, Standard Operating Procedures, Internal Circulars, contract of non-critical projects, projects charters, etc.

Department:	Administration/IT
Document Reference Number	CMC- IT-ADHICS- 002
Issue Date:	01/07/2020
Review Date:	01/05/2021
Next Revision Date:	01/05/2023

ASSETS MANAGEMENT POLICY

	Center facilities Information that relates to the internal functioning of CMC and will not have general relevance and applicability to a wider audience. Although individual items of information are not sensitive, taken in aggregate they may reveal more information than is necessary, if they were to be revealed.	Medical Center facilities financial, operational or reputation status.	
Public 	Information destined to be used in public domain or public use, and has no legal, regulatory or organizational restrictions for its access and/or usage. Intended purpose from the creation, access and use of the information is the general advancement of society, promotion of the interest of the organization and of the country, providing essential information equipping citizens, patients and other stakeholders understand better the country's/governmental/organizational vision and values	No impact	Website information, news articles, marketing disseminations, etc.

6.4 Sharing of Information classified as Secret and Confidential with third parties or any other Canadian Medical Center & Group employees shall be based upon obtaining proper authorization as defined previously and applying strict controls such as signing NDA.

6.5 Any information where the classification is not obviously clear or not done shall be treated as Confidential irrespective of the content or the data it carries.

6.6 Information Assets Labeling

6.6.1 All information regardless of its form (electronic or physical) shall be classified and shall be appropriately labeled based upon the classification category identified.

6.6.2 All Information Systems or electronic data or information of Canadian Medical Center facilities which are used for processing information, where physical labeling is not possible, shall be considered as Confidential.

6.7 Information Assets Reclassification

6.7.1 Information Asset owner shall consider reclassification of the information asset at any point of time whenever there is a need to change the classification due to changing business requirements.

6.7.2 The reclassification of assets shall be done by the information asset owner either in terms of degrading or upgrading its classification.

Department:	Administration/IT
Document Reference Number	CMC- IT-ADHICS- 002
Issue Date:	01/07/2020
Review Date:	01/05/2021
Next Revision Date:	01/05/2023

ASSETS MANAGEMENT POLICY

6.7.3 Since re-classification involves change in access control, appropriate pre-cautions/security controls shall be considered against information disclosure.

6.8 Information Assets Handling

- 6.8.1 All information assets shall be stored according to the assigned classification category of information.
- 6.8.2 Appropriate controls shall be in place to ensure security of the information during its transmission over different channels such as LAN, WAN, Internet or physical delivery. The level of controls shall be in line with the classification category of assets being transmitted.
- 6.8.3 The recipient of the information shall treat it in accordance with the information asset classification established by its originator.
- 6.8.4 The information asset owner shall consider proper transmission controls for the information assets transmission requirements.

6.9 Information Assets Disposal

- 6.9.1 All kinds of information assets shall be disposed-off in a secure manner at the end of their intended life cycle with proper authorization from the information asset owner.
- 6.9.2 The information asset owner shall ensure that appropriate security controls are considered while disposing the information assets so that the information contained in it is irrecoverable. Suggested retention and disposal procedure is provided in the policy appendix – Information assets management procedure. (attachment 1)

7. DEFINITIONS AND ABBREVIATIONS:

SL NO	DEFINITIONS	ABBREVIATIONS
7.1	Asset Management	Asset Management – Is the process of identifying; classifying, managing, recording and coordinating the assets (physical, IT and information) to ensure their security and the continued protection of any confidential data that Canadian Medical Center stores or gives people access to. Canadian Medical Center defines an 'Asset' as any item, system, application or entity that has potential or actual value to our organization. Such assets include but are not limited to: 1. Information (including personal data) 2. Paper records or Electronic records 3. Files and folders 4. Software licenses a) Systems b) Computers or Workstations c) Networks d) Servers e) Hardware f) Software g) Telephony Systems h) Equipment

Department:	Administration/IT
Document Reference Number	CMC- IT-ADHICS- 002
Issue Date:	01/07/2020
Review Date:	01/05/2021
Next Revision Date:	01/05/2023

ASSETS MANAGEMENT POLICY

		i) Databases j) Technology k) Printers/Scanners l) Fax Machines Assets can be both tangible and intangible and are of value to a business based on their importance, function and use. While information is one of the Canadian Medical Center Group of Companies most valuable assets, we understand the association and importance of the IT and physical assets that use, process, store and provide access to such information. As such, all forms of assets recorded by the CMC are valued and afforded a high level of protection and governance. 'Information Assets' we are collectively describing all assets within the CMC that are identified, recorded and secured. Most of our assets, including IT and physical are in place with the main purpose of holding and protecting personal information, and as such, we refer to all assets collectively as 'Information Assets'.
7.2	CMC facilities	Licensed facilities in Abu Dhabi where ADHICS standards are applicable: 1. Canadian Medical Center LLC 2. Canadian Medical Center LLC Branch -2 3. Canadian Medical Center LLC Branch – 3 4. Canadian Medical & Rehabilitation Center LLC 5. CMC First Aid Clinic 6. CMC Healthcare L L C – SOLE PROPRIETORSHIP L.L.C.

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 Relevant HR Law, the Code of Conduct for Employees and any other applicable UAE Laws in this regard.
- 9.2 If Users are unsure or not clear of anything in this policy, they should seek clarification or advice from IT Department.
- 9.3 The IT Department reserves the right to check the compliance of this policy on a periodic basis.
- 9.4 Any exceptions to this policy with valid business justification require approval from IT Manager on a case-to-case basis.
- 9.5 CMC facilities functioning at university level will be managed as per university rules and regulations as applicable in UAE internally & externally.

Department:	Administration/IT
Document Reference Number	CMC- IT-ADHICS- 002
Issue Date:	01/07/2020
Review Date:	01/05/2021
Next Revision Date:	01/05/2023

ASSETS MANAGEMENT POLICY

9.6 CMC Healthcare providing School Clinic's ADHICS requirements must be maintained as per applicability of the scope wherever necessary.

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 https://www.getsafeonline.org/themes/site_themes/getsafeonline/download_centre/Sample_Acceptable_Usage_Policy.pdf
- 10.3 Consent Policy Reference no. (DOH-Policies and Procedure Reference Number PPR/HCP/P0003/09 Issue Date:
- 10.4 DOH standards for consent policy - PPR/HCP/P0003/07
- 10.5 DOH Policy on the Abu Dhabi Health Information Exchange DOH/POL/STR/HIE/1.0/201
- 10.6 CMC ADHICS policies- a) Electronic Communication usage policy – Ref CMC-IT-ADHICS- CMC(Health information security policy CMC- IT-ADHICS- 010, Third Party Security Policy - CMC- IT-ADHICS- 01 Information security CMC high level policy - CMC- IT-ADHICS- 003)

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
02	01/05/2021	Revised scope -3.1.6	Page 1
02	01/05/2021	Policy statement updated 2.4	Page 1
02	01/05/2021	Special instructions – 9.6 & 9.7	Page 7

13. APPENDIX:

13.1 Attachment 1

Department:	Administration/IT
Document Reference Number	CMC- IT-ADHICS- 002
Issue Date:	01/07/2020
Review Date:	01/05/2021
Next Revision Date:	01/05/2023

ASSETS MANAGEMENT POLICY

TYPE OF MEDICAL RECORD / HEALTH INFORMATION (IF APPLICABLE)	MINIMUM RETENTION	
	PERIOD OF MEDICAL RECORD/HEALTH INFORMATION FROM DATE OF LAST ATTENDANCE	DISPOSAL SCHEDULE
Records of Royal Patients	Indefinite	Do not destroy
Records of UAE Nationals	25 Years	Destroy after completion of 25 years from last attendance/visit or last access on behalf of the patient
Expatriate patients	25 Years	Destroy after completion of 25 years from last attendance/visit or last access on behalf of the patient
Medico-Legal Cases	25 Years	Destroy after completion of 25 years
Deceased Patients	25 Years	Destroy after 25 years.
The patient health records of certain major diseases and incidents selected by the administrations and requested by the consultants for academic, research and administrative purposes may be retained for longer periods than specified.		
Operation Theatre(NA), Narcotic, Infection control Registers	3 Years	Destroy after the completion of 3 years
Daily Statistic Reports	3 Years	Destroy after the completion of 3 years
Monthly Statistics Reports	3 Years	Destroy after the completion of 3 years
Yearly Statistics Reports	3 Years	Destroy after the completion

Department:	Administration/IT
Document Reference Number	CMC- IT-ADHICS- 002
Issue Date:	01/07/2020
Review Date:	01/05/2021
Next Revision Date:	01/05/2023

ASSETS MANAGEMENT POLICY

Document Developed By:

IT Support	Mr. Muhamed Shifas Avudiyil		01/05/2021
	Name	Signature	Date

Document Developed & Reviewed By:

IT supervisor/IT Manager	Mr. Yahya Mannooparambil		01/05/2021
	Name	Signature	Date
Asst. Manager Quality	Ms. Dhanya Thankappen		01/05/2021
	Name	Signature	Date

Document Approved By:

Chief Operating Officer/Chief Financial Officer	Mr. Imran Saleem		01/05/2021
	Name	Signature	Date