# **Access Policy**

## I. Purpose

The purpose of this policy is to maintain an adequate level of security to protect Nested Knowledge data and information systems from unauthorized access. This policy defines the rules necessary to achieve this protection and to ensure a secure and reliable operation of Nested Knowledge information systems.

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## II. Scope

**Who is Affected:** This policy affects all employees of this Nested Knowledge and its subsidiaries, and all contractors, consultants, temporary employees and business partners.

### Affected Systems:

This policy applies to all computer and communication systems owned or operated by Nested Knowledge and its subsidiaries. Systems include company shared drives, purchased software, as well as access to the Nested Knowledge AutoLit review platform. Similarly, this policy applies to all platforms (operating systems) and all application systems. Reviews developed in the AutoLit software by parties external to Nested Knowledge are not covered in this policy.

## **III. Access Control Policy**

### **Entity Authentication**

Any User (remote or internal), accessing Nested Knowledge networks and systems, must be authenticated. The level of authentication must be appropriate to the data classification and transport medium. Entity authentication includes but is not limited to:

- Automatic logoff
- Unique user identifier
- Password

### System Access Controls:

Access controls will be applied to all computer-resident information based on the class of the data and information to ensure that it is not improperly disclosed, modified, deleted, or rendered unavailable.

### Administrative Privileges:

Access to Nested Knowledge Systems is managed by internal administrators who approve employees and contractors. For sensitive information, admin privileges are granted to limited personnel.

### Need-to-Know:

Users will be granted access to proprietary data on a need-to-know basis. That is, users will only receive access to such information when required for performing their jobs.

### **Removal of Users:**

Individuals who are terminated, removed, or no longer in need of access to Nested Knowledge information systems will be removed from all systems within 24 hours in most cases, and within 72 hours under special circumstances. Individual's data contributions will be retained and anonymized.

#### **Access for Non-Employees:**

Individuals who are not employees, contractors, consultants, or business partners must not be granted a user-ID or otherwise be given privileges to use Nested Knowledge internal information systems unless the written approval of a Department Lead has been obtained. Before any third party or business partner is given access to this Nested Knowledge computers or internal information systems, a confidentiality, non-disclosure, or other similar agreement defining the terms and conditions of such access must have been signed by a responsible manager at the third party organization.

### **Unauthorized Access:**

Employees are prohibited from gaining unauthorized access to any other information systems or in any way damaging, altering, or disrupting the operations of these systems. System privileges allowing the modification of 'production data' must be restricted to 'production' applications.

### Access Reviews:

Nested Knowledge will perform quarterly access reviews on accounts for all internal systems, including but not limited to:

- Nested Knowledge application (AutoLit)
- Shared Google Drives
- Google Meets calendar invites
- Time tracking application

## IV. Audit Trails and Logging

Logging and auditing trails are based on the Data Classification of the systems. For confidential systems, access to confidential systems will be logged and audited in a manner that allows the following information to be deduced:

- Access time
- User account
- Method of access

All privileged commands must be traceable to specific user accounts/ Audit trails for confidential systems should be backed up and stored in accordance with Nested Knowledge back-up and disaster recovery plans. All system and application logs must be maintained in a form that cannot readily be viewed by unauthorized persons. All logs must be audited on a periodic basis. Audit results should be included in periodic management reports.

### Segregation of Duties:

Segregation of duties exist between individuals responsible for approving, granting, monitoring, and reviewing access logs.

## V. Remote Access Policy

### Remote Access (application):

The Nested Knowledge application is run in a VPC (for details, see Network Security Policy). This network is only accessible by release engineers who are granted SSH keys. These keys may be revoked or refreshed at any time, as necessitated by personnel changes or incidents. The VPC is only accessible through a single bastion host.

### **Remote Access (internal):**

Nested Knowledge has no internal network for employees, therefore remote access is not applicable. Should Nested Knowledge establish a network, access to the network through remote access will be managed by a Virtual Private Network (VPN). The VPN will request for username and password or some other form of advanced authentication. Remote access must conform at least minimally to all statutory requirements including but not limited to HCFA, HRS-323C, and HIPAA.

### Workstation Access Control System:

All workstations used for this business activity, no matter where they are located, must use an access control system approved by Nested Knowledge. Active workstations are not to be left unattended for prolonged periods of time, where appropriate. When a user leaves a workstation, that user is expected to properly log out of all applications and networks, and remove confidential information from desks, printers, and faxes. Users should avoid use of public charging stations.

When accessing Nested Knowledge systems from a personal computer, authorized users are responsible for preventing access to any of our computer resources or data by non-authorized Users. The authorized user bears responsibility for and consequences of misuse of the authorized user's access.

### **Remote Work Licenses:**

Remote workers must follow software licensing restrictions and agreements on all software used to process Nested Knowledge information at alternative work sites.

### **Remote Working Environmental Controls:**

Equipment should be located and/or protected to reduce the risks from environmental threats and hazards, and opportunities for unauthorized access

For cloud-related access protocols, please refer to our Cloud Security Policy.

### **Compliance Statement**

All Employees and Contractors who access Nested Knowledge's information systems will be provided with and required to review the Remote Access Policy.Employees who deliberately violate this policy will be subject to disciplinary action up to and including termination.

### **Revision History**

Author	Date of Revision/Review	Comments
K. Holub	11/18/2021	
K. Kallmes	1/20/2022	Approved; removed chain of trust language
P. Olaniran	10/6/2022	Minor revisions
K. Cowie	01/24/2023	Minor revisions to workstation policy

### **Return to Policies**

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