



Subject: Information Management Policy of *Banco de la República*

I. INTRODUCTION

In 2011, the Administrative Council of *Banco de la República* approved the principle, policies, and assignment of responsibilities for the proper management of information seeking to improve the use, organization, conservation, and access to corporate information.

Corporate information corresponds to that which is produced as part of the Bank's processes, activities, services, and operations. Its management must recognize the value this has for the institution since it serves as a support for the rights, obligations, responsibilities, decisions, rules, or policies adopted by the Bank for the work carried out by its employees or by third parties rendering services to the Bank and for the institutional memory.

The fact that "corporate information is a strategic asset of the Bank" is recognized as a fundamental principle. Information governance policies seek to ensure that it is properly assessed, classified, valued, conserved, preserved, protected, access, publication, disclosure, and delivery. Both the principle and the policies cover corporate information in physical and electronic media (structured, semi-structured and unstructured), throughout its life cycle.

The Administrative Council updated the policy on publication, disclosure, and delivery of information, among others, in 2015 to incorporate the aspects related to the implementation of the Law on Transparency and Access to Public Information (Law 1712/2014) and the information management tools regulated in said law.

II. INFORMATION MANAGEMENT

Information management is defined as the way in which an organization plans, identifies, produces, receives, organizes, manages, maintains, uses, controls, exchanges, values, retains, and destroys its information. This includes all activities related to the use and handling of information in all its forms and formats.

In the Bank, the main objective of information management is to ensure that corporate information¹ is available in the correct format and medium to authorized persons during its life cycle and within the

¹ Corporate information: Corporate information is defined as information that meets at least one of the following characteristics: 1. It is produced, sent, or received in the performance of a function, activity, service, or operation assigned to the Bank. 2. It serves as support or evidence of rights, obligations, or responsibilities of the Bank or third parties in connection therewith. 3. It is that which contains the decisions, rules, or policies adopted or established by the Bank's competent authorities. 4. It is generated as a result of the interaction between the Bank and its customers, contractors, or users and that may be of interest to them or may produce legal effects. 5. It is required in order to comply with any regulation or policy, to leave evidence and proof of the work carried out by the Bank's employees or third parties rendering services to the Bank. 6. Contributes to institutional memory.



established retention period. To this end, the Information Management System (SGI in Spanish) seeks to achieve uniform performance in the management of corporate information that ensures confidentiality, integrity, availability, usability, reliability, and authenticity of the information so as to support the efficient and effective implementation of the Bank's processes and to provide future evidence of their development.

III. PRINCIPLE OF INFORMATION MANAGEMENT IN THE BANK

The Bank has assumed the following as its sole principle for information management: "Corporate information is a strategic asset of the Bank," with the following clarifications: i.- information belonging to other institutions that is required and managed by the Bank in carrying out its functions, processes, activities, or operations shall be treated as corporate information and shall have guidelines established for its management and preservation; ii. Documents belonging to the Bank's General Auditing Office are excluded from being subject to this principle since the management and preservation of its documents are carried out according to the Auditor General's instructions.

IV. INFORMATION MANAGEMENT POLICIES AT THE BANK

All employees and third parties working in the Bank are responsible for the proper management of corporate information and must also comply with the policies applicable to third parties² with whom they interact in the performance of their duties. Third parties must fully comply with these policies when they generate, receive, or have access to the Bank's corporate information. Listed below are the eight policies that apply to corporate Information Management:

- **P1. Information governance.** Corporate information management must have a governance framework that defines both the strategic direction and the roles and responsibilities in the use and management of information in the information life cycle.
- **P2. Management of information as an asset.** Corporate information must be analyzed, planned, valued, classified, and organized uniformly as per the Bank's functions, processes, and/or procedures.
- **P3. Retention and preservation of information.** The management of corporate information must establish retention periods according to its assessment and the Law and guarantee its preservation during that time.
- **P4. Integrity and completeness of Information.** Information management must ensure that corporate information is a complete and reliable representation of the facts it supports. In the case of modification, there must be mechanisms in place to determine what changes have occurred.

² Third parties: individuals who provide their services to the Bank as temporary workers, trainees, interns, apprentices, and employees or subcontractors of legal institutions or contractors.



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- **P5. Access to information.** Information management must ensure timely access to corporate information for those who are authorized within the established retention periods.
 - **P6. Publication, disclosure, and delivery of public information.** Information management must include the Bank's compliance with regulations regarding access to public information ([External Resolution 01/2015](#) of the Board of Directors of *Banco de la República*), confidentiality, protection of personal data ([Policies and General Guidelines for the Protection of Personal Data](#)), intellectual property ([Copyright and Intellectual Property Policies](#)) and interoperability, and other applicable regulations in accordance with its own legal regime.

Paragraph 1. The Board of Directors of *Banco de la República* shall define the policies for access and publication of the information related to the exercise of its functions and support for its decisions including the index of Classified and Reserved Information ([External Resolution 01/2015](#) of the Board of Directors of *Banco de la República*, Article 3, paragraph 1).

Paragraph 2. The Governor, or his designee, shall define the editorial policy of *Banco de la República*, which includes, among other things, the publication of statistical information and research and analysis papers ([External Resolution 01/2015](#) of the Board of Directors of *Banco de la República*, Article 3, paragraph 3).

- **P7. Information security.** Information management must incorporate security mechanisms and procedures that guarantee the protection of information and proper risk management. ([General Policy on Information Security](#)).
- **P8. The information is contemplated within Technological Changes.** Prior to the adoption, change, or disuse of technologies, the impact on information management should be assessed.