Physical Security and Access Policy

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<th>Version</th>
<th>Approval Date</th>
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<td>1.0</td>
<td>October 25, 2017</td>
<td>Security Officer</td>
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1. Purpose

The purpose of these policies is to protect all employees, consultants, interns, and subcontractors of HSX from physical harm and to provide the physical security to any health information contained within the HSX suite.

2. Scope

These policies apply to all employees, consultants, interns, and subcontractors of HSX and to the Ten Penn Center Building Staff.

3. Policy

HealthShare Exchange (HSX) Suite access at Ten Penn Center, 1801 Market Street, Suite 750, Philadelphia, PA 19103 will be governed by the following security settings:

- Beyond what is stated below, HSX upholds the policies contained and maintained within the Ten Penn Center Tenant Manual and Ten Penn Center Building Security Staff.
- Building Access Policies:
  - Access to the HSX Suite will be permissible:
    - HSX Employees: A full time employee of HSX will have access to the suite 24 hours a day 7 days a week.
    - HSX Fellows: A fellow will have access to the suite 8:00 AM to 8:00 PM Sunday through Saturday.
    - HSX Interns and Co-ops: An intern or co-op employee of HSX will have access to the suite 8:00 AM to 8:00 PM Monday through Friday. No weekend access will be provided.
HSX Consultants: A consultant of HSX will have access to the suite 24 hours a day Monday through Friday and may request for weekend access depending on the related work requirements.

HSX Part Time Employees: A part time employee of HSX will have access to the suite 8:00 AM to 8:00 PM Monday through Friday. No weekend access will be provided.

Ten Penn Center Building Staff: Staff employees of the Ten Penn Center building will have access to the suite 24 hours a day 7 days a week.

Weekend Access: A fellow, intern, co-op, consultant, and part time employees can request weekend access Saturday and Sunday 8:00 AM to 8:00 PM for specific job-related activities if needed. This will be authorized for a specific period of time only and not permanently.

- Monitoring of HSX Suite Access
  - A visitor log containing appropriate information (i.e. name, date, time) is reviewed monthly and maintained for at least 2 years.
  - An audit trail of all physical access is maintained.
  - Physical access rights are reviewed and physical access devices are inventoried every 90 days and updated accordingly.

- Building Security Policies
  - Doors to the HSX Suite are locked automatically and electronically.
  - Keys for the HSX Suite high-risk entry/exit points are changed when lost or stolen or combinations are compromised. When an electronic key card is lost, the identification code for access is discontinued.
  - The Ten Penn Center Security Staff actively monitors unoccupied areas at all times and sensitive and restricted areas in real time as appropriate for the area.
  - Any security threats presented by neighboring premises are identified through Ten Penn Center’s notifications to the HSX Operations Manager.
  - HSX maintains an electronic log of alarm system events which is reviewed no less often than monthly.

- Prevention and Maintenance Policies
  - Repairs or modifications to the physical components of the HSX Suite which are related to security (e.g., hardware, walls, doors and locks) are documented and retained by the Operations Manager retained by the
Operations Manager a suggested 7 years (not a substitute for counsel’s own research and determination as to the appropriate periods)

- All HSX Suite maintenance requests are fielded and regulated by the Operations Manager and subsequently relayed through the Ten Penn Center Staff for completion. The Operations Manager maintains records of all maintenance incidents.
- The appropriate tools for maintenance used by Ten Penn Center Staff are approved, controlled, monitored and periodically checked.
- Following maintenance, security controls are checked and verified by Ten Penn Center Staff.
- Perimeter security alarm training will be provided by Ten Penn Center.
- Fire prevention and suppression mechanisms, including workforce training of the Operations Manager by Ten Penn Center Staff, are provided.
- Fire suppression and detection systems are supported by an independent energy source monitored by Ten Penn Center Building Staff.
- Water detection mechanisms maintained by Ten Penn Center Building Staff are in place with master shutoff or isolation valves accessible, working, and known.

4. Procedure

The following procedures apply to HSX internal operations only:

- Physical Security and Access Procedures

5. Enforcement

- Ten Penn Center Building Staff shall be responsible for enforcing their building policies as referenced above
- The HSX Operations Manager shall take the lead in responsibility for HSX internal compliance with this policy.
- During the onboarding process, all new HSX employees, interns, contractors, and consultants will be required to sign an attestation stating full awareness and compliance with Ten Penn Center Building policies which can be found on the HSX OneDrive.
6. Definitions

For a complete list of definitions, refer to the *Glossary*.

7. References

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| Security Officer   | Daniel.wilt@healthshareexchange.org | Glossary  
| Approved By        | Approval Date                  | Ten Penn Center Tenant Manual      |
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