



Bogner/Brown

**RESOLUTION NO. 6635**

**WHEREAS**, since February 2024, the Board's Governance Committee (the "Committee") requested, and the Board of Directors ("Board") reviewed, a recommendation to revise Board Policy SD-12: Information Management and Security; and

**WHEREAS**, the proposed revisions were posted on OPPDCommunityConnect.com for public comment between February 14, 2024 and March 17, 2024, and the Board reviewed the public comments that were received.

**NOW, THEREFORE, BE IT RESOLVED** by the Board of Directors of the Omaha Public Power District that the proposed revisions of Board Policy SD-12: Information Management and Security are approved, effective March 21, 2024, as set forth in Exhibit A, attached hereto.

Adopted March 21, 2024



**BOARD OF DIRECTORS**

# Board Action

March 19, 2024

ITEM

Revisions to SD-12: Information Management and Security Policy

PURPOSE

To ensure full Board review, discussion and acceptance of SD-12: Information Management and Security policy revisions.

FACTS

- a. The Governance Committee is responsible for evaluating and monitoring Board Policy SD-12: Information Management and Security.
- b. During the SD-12: Information Management and Security monitoring report discussion on November 14, 2023, members of the Board expressed interest in management’s recommendations for potential revisions to this policy.
- c. The Governance Committee proposed revisions for Board consideration and public feedback on February 13, 2024. Public comments were accepted on OPPDCommunityConnect.com from February 14, 2024 to March 17, 2024.
- d. The Governance Committee is recommending to the Board that Board Policy SD-12: Information Management and Security be revised as outlined in Exhibit A.

ACTION

Board of Directors approval of SD-12: Information Management and Security policy, as outlined in Exhibit A.

**RECOMMENDED:**

DocuSigned by:

*Kathleen W. Brown*

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Kathleen W. Brown  
Vice President and Chief  
Information Officer

**APPROVED FOR BOARD CONSIDERATION:**


DocuSigned by:

*L. Javier Fernandez*

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L. Javier Fernandez  
President and Chief Executive Officer


Attachments: Exhibit A – Clean Version of SD-12  
Exhibit B – Redline Version of SD-12  
Resolution

	<b>OMAHA PUBLIC POWER DISTRICT Board Policy</b>	<b>Category:</b>	Strategic Direction
	<b>Policy No. and Name:</b>  <b>SD-12: Security and Information Management</b>	<b>Monitoring Method:</b>	Governance Committee Board Report
		<b>Frequency:</b>	Annually
<b>Date of Approval:</b>	October 15, 2015 March 10, 2016 October 13, 2016 March 21, 2024	<b>Resolution No.:</b>	6082 6114 6146 6635

Robust security and information management practices are critical to effective risk management and to ensure regulatory compliance, business resiliency and customer-owner satisfaction, and the safeguarding of people and facilities.

Therefore, OPPD shall take prudent and reasonable measures to ensure:

- A safe and secure environment for all OPPD personnel, contractors, visitors, operations, and properties.
- Security processes support emergency management, vulnerability, and behavioral threat management programs, and utilize applicable national, industrial and communications security best practices.
- Processes and methodologies protect print, electronic, or any other form of information or data from unauthorized access, misuse, disclosure, destruction, or modification.
- Customer privacy and protection of customer-owner information, preventing any dissemination of customer-owner information to a third party for non-OPPD business purposes without customer-owner consent or except as provided by law or for a business purpose.
- Efficient and systematic control of OPPD records inclusive of, identification, classification, storage, security, retrieval, tracking and destruction or permanent preservation of records.
- Technology compliance with contractual and legal requirements through the use of technical controls, system audits and legal review.

	<b>OMAHA PUBLIC POWER DISTRICT Board Policy</b>	<b>Category:</b>	Strategic Direction
	<b>Policy No. and Name:</b>  <b>SD-12: <u>Security and Information Management and Security</u></b>	<b>Monitoring Method:</b>	Governance Committee Board Report
		<b>Frequency:</b>	Annually
<b>Date of Approval:</b>	October 15, 2015 March 10, 2016 October 13, 2016 <u>March 21, 2024</u>	<b>Resolution No.:</b>	6082 6114 6146 <u>66XX</u>

Robust security and information management ~~and security~~ practices are critical to effective risk management and to ensure regulatory compliance, business resiliency and customer-owner satisfaction, and the safeguarding of people and facilities.

~~OPPD shall safeguard and protect data, information and assets from inappropriate use, improper disclosure and unauthorized release.~~

Therefore, OPPD shall take prudent and reasonable measures to ensure:

- A safe and secure environment for all OPPD personnel, contractors, visitors, operations, and properties.
- Security processes support emergency management, vulnerability, and behavioral threat management programs, and utilize applicable national, industrial and communications security best practices.
- ~~Information Security: OPPD will implement p~~Processes and methodologies ~~to~~ protect print, electronic, or any other form of information or data from unauthorized access, misuse, disclosure, destruction, or modification.
- ~~Customer p~~Privacy: ~~Except as provided by law or for a business purpose, OPPD and protection of customer-owner information, preventing any will not dissemination of~~ customer-owner information to a third party for non-OPPD business purposes without customer-owner consent or except as provided by law or for a business purpose.
- ~~Records Management: The e~~Efficient and systematic control of OPPD records inclusive of, identification, classification, storage, security, retrieval, tracking and destruction or permanent preservation of records.
- ~~Compliance: Comply~~ Technology compliance with contractual and legal requirements through the use of technical controls, system audits and legal review.