

<b>Volume I1:</b> Information Technology	<b>I1.99.2</b> <b>Vendor Management</b>  <b>INTERIM POLICY</b>  <b>Effective Date:</b> 06/20/2024	<b>Responsible Offices:</b> University Technology Services University Procurement
<b>Chapter 99:</b> General		<b>Responsible Officers:</b> Information Security Officer Director of Procurement

## POLICY STATEMENT

The University is responsible for ensuring that third-party vendors demonstrate adequate internal controls to safeguard its information and IT Resources that vendors access or manage on behalf of the University, and that the service level agreements are satisfied and maintained.

## PURPOSE OF THE POLICY

This policy establishes the expectations and guidelines for managing third-party vendor services and provides the code of conduct that vendors must comply with throughout their engagement with the University.

## WHO IS AFFECTED BY THIS POLICY

All employees who are responsible for the procurement and management of third-party vendor solutions and services and third-party vendors who provide these services and solutions.

## DEFINITIONS

**Third-party vendors:** individuals or organizations who provide solutions and services to the University.

## REGULATIONS

### University Departments

University departments shall ensure that all vendors who provide IT software, equipment, and services have appropriate controls in place to satisfy the University's "due diligence" requirements. This includes but is not limited to the following:

1. Information security and data privacy contract language must be added to all contracts that involve access to University systems, data, and restricted areas, or provide custom system development on behalf of the University. This is coordinated through the University's Procurement Department and University Technology Services.
2. User Departments shall ensure that vendors' System and Organization Controls (SOC) reports are received and reviewed by the Information Security Team before a procurement is approved. Please refer to the [University's SOC Reporting Policy](#).

### Managing Third-Party Vendors

- A. Third-Party Vendor Selection
  1. Third parties shall be selected based on their ability to meet the needs of the University as detailed in the [Procurement Policy and Standard Procedures](#).
- B. Third-Party Vendor Information
  1. All third parties shall be registered and recorded as appropriate.
  2. The following information shall be maintained for all vendors:



- a. Vendor name and contact details;
  - b. Service provided to the University;
  - c. The data they hold, process, or transmit;
  - d. Contact information, if applicable.
- C. Data Sharing and Processing Agreements and Subcontracting
1. Contracts with vendors that process University data shall include appropriate data privacy, sharing, and processing clauses. These clauses must be agreed upon before finalizing the contracts.
  2. University data held or processed by vendors shall be adequately protected from data breaches.
  3. Third-party vendors are expected to have undertaken their due diligence on their sub-contractors.
- D. Third-Party Audit and Performance Review
1. User Departments shall review all service-level agreements for each vendor periodically (as deemed necessary) to ensure the requirements and expectations of the agreements are satisfied.
- E. Third-Party Vendor Security Incident Management
1. Third-party vendors shall have a security incident management process in place.
  2. Third-party vendor security incidents impacting the University must be reported to the University per the contractual arrangement.
  3. Third-party vendor security incidents shall be managed as part of the University's cyber incident response plan where necessary.
- F. Third-Party Vendor Compliance
1. The necessary steps to verify compliance with this policy shall be undertaken. This includes but is not limited to, business tool reports, and internal and external audits.
  2. Failure to adhere to this policy will be addressed under the University's disciplinary processes and relevant third-party contractual clauses relating to non-conformance with the University's policies.
- G. Third-Party End of Contract Agreement
1. At the end of the contract, the contract shall be terminated in line with the obligations set out in the contract agreement.
  2. All third-party access to University systems and information shall be revoked.
  3. Where applicable, all assets including University information shall be returned to the University.

### **Code of Conduct for Third-Parties**

Third-party vendors doing business with the University are expected to adhere to the following Vendor Code of Conduct.

1. In doing business with the University, vendors and their representatives are expected to honor all business commitments and display professional behavior, fairness, and reliability in all business transactions.
2. It is inappropriate for a vendor to make a donation of any sort to a department/school that may influence a future purchasing decision. In addition, NEIU employees, students, and student organizations have no authority to commit the University to the purchase of any solution or service.
3. The University has the right to request a detailed spending report from any vendor registered in its financial system. Requested reports must be provided on time.
4. The University has the right to utilize third-party benchmarking services when analyzing proposals and quotes submitted by vendors.
5. The University strongly discourages significant marketing efforts directed at departments and schools where a contract already exists.
6. All indicia, including but not limited to names, logos, marks, emblems, and designs, associated with or identifying the University are owned and legally protected by the University and must not be used without prior written consent from the University. In addition, news releases (including promotional literature and commercial



advertisements) shall not be made without prior written University approval, and then only by explicit written instructions from the University.

## PROCEDURES

All University employees will adhere to the procedural directives outlined in the Regulations section of this policy.

## AUTHOR REFERENCE

[Northwestern University Vendor Code of Conduct](#)

[University of Greenwich Policy for Third-Party Supplier Security](#)

## HISTORY

Draft - May 2024

## RELATED POLICIES AND OTHER INFORMATIONAL MATERIAL

[Procurement Policies and Standard Procedures](#)

[I1.02.9 System and Organization Controls Reporting](#)

[I1.99.1 Data Governance Interim Policy](#)

## CONTACT INFORMATION

Please direct questions or concerns about this policy to:

Contact	Phone	Email
Information Security Officer	(773) 442-4357	<a href="mailto:helpdesk@neiu.edu">helpdesk@neiu.edu</a>
Director of Procurement	(773) 442-5300	<a href="mailto:purchasing@neiu.edu">purchasing@neiu.edu</a>

## DISCLAIMER

The University reserves the right to modify or amend sections of this policy at any time at its sole discretion. This policy remains in effect until such time as the Responsible Officer calls for review. Requests for exception to any portion of this policy, but not to the policy statement, must be presented in writing to the Responsible Officer.