

(English translation provided for informational purposes. If the English and German versions allow different interpretations, the German version is legally binding. Note: In the text are used the German abbreviations for the roles.)

Information Security Policy of the Gesellschaft für wissenschaftliche Datenverarbeitung mbH Göttingen

– Information Security Policy / Informationssicherheitsrichtlinie (ISRL)
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The Management of GWDG has issued the revised version of the Information Security Policy on 10.01.2022.

The Works Council of GWDG gave its consent in 01.12.2021.

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Section I: Principles

§ 1 Subject matter and scope

- (1) The information security Policy defines responsibility structures, assignment of tasks and the cooperation between those involved as well as the content-related specifications of GWDG's information security process.
- (2) It applies to all employees of GWDG, especially when they use the IT infrastructure of GWDG or process data of GWDG or GWDG's customers, and to the entire IT infrastructure of GWDG, including the IT systems that are operated.

§ 2 Framework conditions

- (1) Running a computing centre increasingly requires the integration of procedures and processes that are based on the possibilities offered by the communication and information technology (IT). Functional and secure IT processes are therefore the key basis for the efficiency of GWDG as IT service provider, especially in the areas of research, teaching, medical care, public health services, training, advanced training and continuing education as well as technology transfer.
- (2) Information security is of fundamental and strategic importance here, and it requires the development and implementation of an information security policy. Not least, secure IT processes are the basic requirement for all data protection measures that have to be implemented when personal data is processed.
- (3) Due to the complex subject matter, the rapidly developing technical possibilities and the limited financial and human resources, this can only be done through a continuous information security process. This information security process must be developed and updated based on the tasks and the rights of GWDG on the one hand and, on the other hand, can only be achieved through continuous information security process within regulated responsibility structures.
- (4) The information security policy not only aims at meeting the existing legal requirements, but also at fundamentally protecting the data and applications used by GWDG and the infrastructure provided by GWDG as well as protecting GWDG from material and immaterial damage and, in the process, taking into account the freedom of research and teaching, worldwide cooperation based on professional exchange, common project structures, high staff turnover, various user groups with their different roles and rights and the rapid development cycles of information technology.
- (5) In this policy, the GWDG is guided by the corresponding policies of GWDG's shareholders.

§ 3 Security goals

- (1) For the purposes of this policy, information security means to establish and maintain
 - (a) "confidentiality"; i.e., to guarantee that only authorised persons have access to information,
 - (b) "integrity"; i.e., to ensure the correctness and completeness of information and processing methods,
 - (c) "availability"; i.e., to guarantee need-based access to information to authorised persons.

- (2) This information security policy is intended to ensure that security measures are taken, which are appropriate for the respective protection purpose and which correspond to the state of the art, in order to minimise the occurrence of information security incidents. These measures particularly serve
 - (a) reliable support of processes by the IT and the continuity of workflows,
 - (b) patient security and treatment effectiveness in medical care by the University Medical Center,
 - (c) the preservation of official, company, business and other secrets,
 - (d) that the requirements resulting from legal specifications are met,
 - (e) that the right of self-determination with respect to information of the person concerned is ensured when his or her personal data is processed,
 - (f) compliance with the regulation of GWDG's shareholders to ensure good scientific practice,
 - (g) the reduction of material and immaterial damage resulting from information security incidents and
 - (h) the implementation of secure and trustworthy procedures for exchanging information, for communication and for transactions with cooperation partners.

§ 4 Information security process

- (1) The information security process is used for securing data, whereby the security of data processing systems and entities must be guaranteed, and particularly includes the following tasks:
 - (a) Definition and determination of responsibilities,
 - (b) Determination of protection requirements and recognition of risks,
 - (c) Definition and determination of access to information as well as the type and scope of authorisation,
 - (d) Determination of security and control measures in accordance with the information security policy,
 - (e) Implementation, review and updating of security and control measures to protect information.
- (2) All information shall be assigned to categories with approximately equal protection requirements; where:
 - (a) "Normal protection required" means that the impacts of damage are limited and manageable,
 - (b) "High protection required" means that the impacts of damage could be considerable,
 - (c) "Very high protection required" means that the impacts of damage could reach an existentially threatening, catastrophic extent.
- (3) Based on possible damaging events and their causes and effects, risks must be assessed and handled with the help of a risk treatment plan by taking risk mitigation, risk avoidance, risk transfer or risk acceptance measures, considering the financial and organisational effort. Any remaining risks within the framework of risk acceptance must be described and the management should assume responsibility for them.

Section II: Organisational specifications

§ 5 Management (Geschäftsführung)

- (1) The overall responsibility of information security and the information security process lie with the management of GWDG.
- (2) The management delegates the organisation and implementation of information security management to the extent specified in § 7 and § 8 to the Information Security Officer (Informationssicherheitsbeauftragter, ISB) or the Information Security Manager (ISM).
- (3) The management is responsible for:
 - a) appointing specialists responsible according to Section (4),
 - b) deciding on the operational concepts according to Section (5),
 - c) deciding on the further handling of information security incidents according to § 13.
- (4) The management appoints an appropriate number of specialists responsible for the data sets, IT procedures, IT systems and infrastructures assigned to a unit. The appointment must be documented. If a specialist responsible is not appointed, then his/her tasks are the responsibility of the management.
- (5) The management decides on the operational concepts based on the statement from the ISB and is responsible for the risks assumed in these concepts.

§ 6 Specialists responsible (Fachverantwortliche)

- (1) Specialists responsible are responsible for implementing the information security processes for the datasets, IT procedures, IT systems and infrastructure assigned to them. This particularly includes the following tasks:
 - (a) Identification of the protection requirement for information, IT procedures, IT systems and infrastructure as well as the analysis of risks,
 - (b) Preparing and updating operational concepts based on the protection requirements assessment and risk analysis,
 - (c) Regular review of the protection requirements assessment, risk analysis and the operational concept according to the intervals to be defined in the operational concept,
 - (d) Initiating and controlling the implementation of the measures laid down in an operational concept, particularly also when using external IT service providers (e.g., order processing).
- (2) To perform their tasks, specialists responsible may seek advice from the ISB or other staff of GWDG.
- (3) A protection requirements assessment and risk analysis may also result in a decision that no further measures over and above the implementation of the information security policy and the catalogue of measures for basic IT protection are required for a dataset, IT procedure, IT system or an infrastructure (Addendum 1).

§ 7 Information Security Officer (Informationssicherheitsbeauftragte*r, ISB)

- (1) The management appoints an Information Security Officer (Informationssicherheitsbeauftragte*r, ISB). The appointment must be documented.
- (2) The tasks of the ISB particularly include:
 - (a) Coordination and further development as well as the monitoring of the implementation of the information security process for GWWDG,
 - (b) Preparing recommendations for the management for the following topics:
 - (i) Preparation and updating of the catalogue of measures for basic IT protection,
 - (ii) Additional information on the information security policy (e.g., recommendations for internal technical standards, model solutions, and contingency plans),
 - (iii) Changes to operational concepts based on security incidents (with respect to § 13 Section (4)),
 - (iv) Training concepts.
 - (c) Providing advice to the following:
 - (i) The management for information security related issues and for the implementation of this policy,
 - (ii) Data protection officers and data protection managers for technical and organisational measures,
 - (iii) Specialists responsible for the preparation of operational concepts.
 - (d) Statements for operational concepts,
 - (e) Preparing and updating an index of all specific information security concepts,
 - (f) Assessing information security incidents and deriving structural and conceptual recommendations in accordance with § 13,
 - (g) Preparing the annual report on information security for the management, including recommendations for the revision of this information security policy and other overarching information security concepts; if necessary, this report is also submitted to other authorities.
- (3) During the information security process, the ISO has to consider data protection issues and involve the Data Protection Officer in the formation of measures and concepts in the event of a conflict of objectives between information security and data protection.

§ 8 Information Security Manager (ISM)

- (1) The management appoints an Information Security Manager (ISM) for GWWDG.
- (2) The tasks of the ISM particularly include:
 - (a) Assignment for the management and monitoring of the implementation of information security measures in the context of risk treatment plans, including awareness-raising and training measures, as well as documentation of measures,
 - (b) Assessing and forwarding information security incident reports and preparing the recommended course of action for handling information security incidents in the operational area in accordance with § 13 Section (2). Checking whether an

information security incident could also be a data protection incident at the same time.

- (c) Preparing an information security report insofar as it concerns
 - (i) the progress and problems involved in the implementation of information security measures (operational aspects) or
 - (ii) information security incidents.

§ 9 Data Protection and Information Security Coordination Team (Datenschutz- und Informationssicherheits-Koordinationsteam DIKT)

- (1) The Data Protection and Information Coordination Team comprises:
 - (a) the ISB of GWDG,
 - (b) the ISM of GWDG,
 - (c) the Data Protection Officers (Datenschutzbeauftragte*r, DSB) of GWDG,
 - (d) the Data Protection Manager (Datenschutzmanager*in, DSM) of GWDG,
 - (e) the respective deputies of ISB, ISM, DSB and DSM
 - (f) a member of the management of GWDG
 - (g) one member of the Works Council of GWDG as well as
 - (h) other persons appointed by the management or the ISB as required.
- (2) The meetings of the DIKT take place as often as the state of business requires, but at least four times a year. They are convened and chaired by the ISB.
- (3) The DIKT serves the following purposes:
 - (a) Information exchange and coordination between those involved in the information security process and the data protection process,
 - (b) Drafting recommendations for amending the information security policy and overarching concepts or advisories on information security and data protection.

§ 10 External service providers

- (1) External IT service providers entrusted with performing tasks on IT systems shall be obliged to comply with the information security policy, insofar as this is in line with the protection requirement.
- (2) Compliance with the information security policy by external IT service providers must be verified by the competent IT staff of the ordering party.
- (3) External IT service providers shall be obliged to inform the client of the risks that can arise in the IT system as a result of the services they provide.

Section III: Content-related specifications

§ 11 Catalogue of measures for basic IT protection

- (1) Content-related specifications for IT systems with a normal protection requirement (basic IT protection) are defined in the "Catalogue of measures for basic IT protection", which is subdivided into measures for IT users and IT staff.
- (2) The provisions of the catalogue of measures are binding; deviating from them is possible solely in accordance with Section (3).
- (3) Provisions that deviate from the catalogue of measures may be drawn up in operational concepts for restricted datasets, areas of the IT infrastructure or IT systems taking into account specific risks and protection requirements, provided that no information security or data protection requirements with regard to the data to be processed or the IT infrastructure are in conflict with them.
- (4)

§ 12 Additional measures

- (1) For all IT systems, the respective specialist responsible must check if there is a higher protection requirement over and above basic IT protection.
- (2) Where a higher protection requirement is identified, additional measures within the framework of an operational concept must be determined by the specialists responsible.
- (3) IT systems for which a higher protection requirement has been identified may be put into operation only after an operational concept for these has been decided upon, implemented and released for operation based on risk assessment.
- (4)

§ 13 Handling of information security incidents

- (1) Employees of GWDG must immediately notify the responsible ISM about incidents relevant to information security (information security incidents).
- (2) The ISM assesses the severity of the information security incident and informs the ISB of the reported information security incident and seeks his/her statement. Based on his/her own assessment and the statement of the ISB, the ISM informs the management about the reported information security incident immediately and/or in the form of an information security report. In consultation with the ISB, the ISM prepares the recommended course of action for the operational processing of the information security incident. Information security incidents which concern data protection must be report to the DSM - in accordance with the applicable data protection policy of GWDG (after their adoption).
- (3) The management decides on the further handling of an information security incident reported by the ISM to the management.
- (4) After an information security incident, the ISB checks whether there is a need to change information security regulations, in particular the policy as well as overarching information security concepts and operational concepts and prepares the recommended course of action for the management, based on the statement of the ISM, in the case of data protection incidents also of the DSB and of the DSM.

- (5) The ISM reports information security incidents to the competent authorities. Insofar as information security incidents are also data protection incidents, the DSM reports them to the competent authorities after their adoption in accordance with the applicable data protection policy of the GWGDG.
- (6) If an information security incident affects user accounts or IT systems of an institution authorized to use it, the contact persons responsible for handling information security incidents must be informed by the ISM and involved in the handling of the information security incident.
- (7) The management can, in a policy document, regulate further details on how to handle information security incidents.
- (8)

§ 14 Threat intervention

- (1) In order to avert a current threat to information security, the IT staff in their respective spheres of responsibility, takes the necessary measures to prevent or eliminate the impact of the damaging event. If the threat is significant, blocking of network connections and user accounts may be taken as a necessary measure.
- (2) If there is an important reason, network connections and user accounts may be blocked without giving prior notification to those affected by the blocking.
- (3) The ISM must be informed immediately.
- (4) The measures are lifted with the consent of the ISM after the necessary IT security measures have been carried out.
- (5) If the measures taken affect user accounts or IT systems of an institution authorized to use, the contact persons responsible for handling information security incidents must be informed by the ISM and involved in the handling of the information security incident, in particular for revocation of measures.

Final provisions

Entry into force and expiry

- (6) The information security policy of the Gesellschaft für wissenschaftliche Datenverarbeitung mbH (GWDG) will come into force on January 11th, 2022.
- (7) At the same time, the IT security policy of the GWDG of February 10th, 2004 expires.

Addendum 1 Catalogue of measures for basic IT protection

A. Measures for users

A.1 User qualification

Responsible for initiation:	Management
Responsible for implementation:	Superiors

- (1) Staff members must be trained in a task-specific manner for the IT procedures used in the workplace. Training objectives are:
 - (a) Secure handling of the application,
 - (b) Sensitisation towards information security issues,
 - (c) Encouraging self-assessment when problems occur (When should experts be involved?),
 - (d) Knowledge of existing provisions,
 - (e) Knowledge of data protection requirements.

A.2 Reporting of IT problems

Responsible for initiation:	ISM
Responsible for implementation:	all employees

- (1) The respective IT user must report any type of IT problem (system crashes, faulty behaviour of applications that have run error-free so far, hardware failures, intrusion by unauthorised persons, manipulations, virus attacks etc.) to the competent IT staff.

A.3 Consequences and penalties in case of security breaches

Responsible for initiation:	Management
Responsible for implementation:	Management

- (1) Violations can have disciplinary or employment law consequences. Moreover, violations of legal provisions (e.g., data protection laws, medical confidentiality) can be prosecuted as a criminal or administrative offence.
- (2) Culpable non-observance of the information security policy particularly constitutes a violation according to Sentence 1 especially if it
 - (a) significantly impairs the security of the employees of GWDG, users, contractual partners, advisers,
 - (b) jeopardises the security of data, information, IT systems or the networks,
 - (c) causes material or immaterial damage to GWDG or institutions entitled to use it,
 - (d) facilitates unauthorised access to systems and information and their disclosure and/or modification,

- (e) facilitates the use of information of GWDG or institutions entitled to use it for illegal purposes and
 - (f) facilitates unauthorised access to personal data and other confidential data.
- (3) If there are sufficient factual indications of a violation, the IT staff can take measures - even without the knowledge of the person/persons concerned - that are appropriate for preventing, intercepting or recording the imminent damage as a result of the violation. The competent Data Protection Officer, a representative of the Works Council (hereinafter collectively referred to as: parties to be involved) must be consulted before taking action; their consent for the measures to be taken is required before they are implemented. The IT staff carrying out the measures informs the following about the course and the result of the measures:
- (a) the parties to be involved,
 - (b) in every case the person concerned, if necessary, the superior and other persons; in all cases in coordination with the parties to be involved.
- (4) Additional data collected or stored beyond the deletion periods as a result of the measure must be destroyed immediately after the measure has been completed. The parties to be involved must determine that a measure has been completed.

A.4 Controlled use of software

Responsible for initiation: ISM
Responsible for implementation: IT staff, IT users

- (1) Only that software which is necessary for the fulfilment of official tasks may be installed on the IT systems of GWDG.
- (2) IT users are not permitted to install or run additional software without authorisation. This particularly applies to downloading software from the Internet or launching software received via email.

A.5 Protection against viruses and other malware

Responsible for initiation: ISM
Responsible for implementation: IT staff, IT users

- (1) An up-to-date virus scanner, which automatically checks all files when they are accessed, must be installed on all workstation computers. This is intended to detect and prevent the intrusion of malicious programs.
- (2) The competent IT staff must be informed if malware infection is suspected.

A.6 Access control

Responsible for initiation: ISM
Responsible for implementation: IT staff, IT users

- (1) Rooms that have workstation computers must be locked outside the normal working hours (especially at night and on weekends) and when there is no one in them. Deviation from this may be allowed only if work organisation urgently necessitates this and if other security measures allow it.

- (2) In rooms open to the public, workstations must be set up such that sensitive data cannot be viewed from screens by unauthorised persons.
- (3) When sensitive data is printed, the removal of the printouts by unauthorised persons must be (ensuring confidentiality).

A.7 Locking and shutting down systems

Responsible for initiation:	ISM
Responsible for implementation:	IT staff, IT users

- (1) When leaving the workstation, the workstation computer must be locked with a password.
- (2) Locking must also be automatically time-controlled when the computer is not used.
- (3) In general, workplace computers are to be shut down at the end of the shift.
- (4) Deviation from the rules for locking and shutting down systems is possible only if work organisation urgently necessitates this (e.g., in the case of measurement and control computers) and if appropriate security measures allow it.

A.8 Securing notebooks, mobile storage media, smartphones

Responsible for initiation:	ISM
Responsible for implementation:	IT users

- (1) In principle, mobile end devices and storage media must be protected against theft using appropriate security measures.
- (2) Unauthorised access to mobile end devices and the data stored on them must be prevented by means of appropriate access protection measures (e.g., passwords, PINs, biometric procedures).
- (3) Storing of sensitive data on notebooks, mobile storage media (e.g., smartphones, USB sticks, etc.) is permitted only if there is a business need and the data is encrypted in accordance with the current security requirements¹. Furthermore, it must be ensured that unauthorised access to data by unauthorised persons is excluded.

A.9 Personal user accounts

Responsible for initiation:	ISM
Responsible for implementation:	IT staff, IT users

- (1) All IT systems (including smartphones) that are used for official purposes must be set up such that only authorised persons have access to them. This primarily requires a login with a suitable authentication method (password, smart card, biometric procedure, etc.).
- (2) The allocation of user accounts for working on IT systems must be person-related-specific [principally](#). Working under another person's user account is not permitted.

¹ Algorithm, key length according to the Federal Network Agency

- (3) User accounts that are to be used jointly by several people (jointly used functional accounts) may only be set up if such accounts are indispensable for the fulfillment of tasks.
- (4) Deputies (temporary delegation of duties) must not be organised by passing on login data for personal user accounts, but by appropriately assigning rights.
- (5) An IT user is prohibited from passing on login data required for the authentication process.
- (6) Dispensing with personal user accounts is permitted for IT systems, in which a quick change of user is required due to the work organisation (e.g., control centres in the UMG, reading rooms) or which are intended for general public access (e.g., kiosk systems, query stations for library catalogues).

A.10 Use of passwords

Responsible for initiation:	ISM
Responsible for implementation:	IT staff, IT users

- (1) Every person is responsible for all actions performed using his/her user account.
- (2) The passwords used for the use of IT systems operated by the GWDG (hereinafter business passwords) must not be identical or similar to passwords used for the usage of other IT systems not operated by the GWDG. The differences between the passwords must be significant; in particular, there must be no systematic connections that could be used to derive one password from the other.
- (3) The following must be observed when dealing with passwords:
 - (a) Passwords must be kept secret.
 - (b) Passwords for personal user accounts must not be passed on to other persons.
 - (c) For passwords of user accounts that are to be shared by several persons (shared function accounts) the following applies:
 - (d) The password of a function account may only be passed on to the persons involved in the function.
 - (e) If a person who knows the password of a function account leaves, the password of the function account must be changed.
 - (f) The entry of a password must take place unobserved.
- (4) The following rules apply to the storage of passwords in IT systems:
 - (a) The storage of official passwords in applications, in particular browsers or on programmable function keys, is generally not permitted.
 - (b) The following exceptions apply to the prohibition on storing official passwords:
 - (c) The storage of an official password in the Eduroam configuration is permitted on desktop and laptop systems and on smartphones.

- (d) The storage of official passwords for e-mail access is permitted on a smartphone.
- (e) The storage of official passwords in a password manager with a secure master password in accordance with the password strength regulation of paragraph (7) is permitted. Longer passwords are recommended.
- (5) The following rules apply to the writing down of passwords on paper
 - (a) Writing down passwords on paper shall be avoided.
 - (b) If writing down is unavoidable, the password shall be kept at least as secure as a bank card or bank note.
 - (c) It is permissible to deposit a password in a locked envelope in a safe under the supervision of the institution for which the holder of the account works.
- (6) Rules for changing passwords:
 - (a) A password must be changed if it has become known to unauthorized persons.
 - (b) Initial passwords must be changed immediately before using the services.
 - (c) Old passwords must not be reused.
 - (d) New passwords and previously used passwords must be significantly different, in particular there must be no systematic correlations which could be used to deduce the new password from the previous password.
- (7) Unless other rules have been explicitly issued for certain passwords, the following requirements apply to passwords:
 - (a) No common or easily guessable strings of letters and/or numbers, such as names, car registration numbers, dates of birth, single words in German or other languages, or only slightly varied versions of such strings shall be used.
 - (b) The password must be at least 8 digits long. 10 digits are recommended.
 - (c) Each password must contain at least one upper and one lower case letter, one number and one special character.
 - (d) Alternatively, (c) may be waived if it is ensured that a chosen password is just as secure as one chosen in accordance with (b) and (c), e.g., by being longer.
- (8) If a user does not gain access to the system for unexplained reasons when logging in with his password, there is a risk that his password should be determined by trying it out in order to gain illegal access to the system. Such incidents should be reported to the relevant supervisor and IT staff (See A.2).
- (9) If a user forgets his or her password, he or she shall request a reset from the responsible IT staff or, if available, via self-service functions without repeated attempts. This provision is intended to prevent the process from being logged and treated as an attempted intrusion.

A.11 Access rights

Responsible for initiation:	ISM
Responsible for implementation:	IT staff

- (1) A user may only be given those access rights that he/she needs to carry out his/her official tasks. In particular, work that does not necessarily require higher privileges not allowed to be performed using privileged user accounts ("administrator", "root", etc.).
- (2) Privileged user accounts may only be assigned to the IT staff, or persons with privileged user accounts must be regarded as IT staff and must observe and implement the measures laid down for the IT staff.
- (3) In addition to technical measures, organisational rules must also be observed (e.g., technically possible but prohibited viewing of users' data by administrators).

A.12 Network access

Responsible for initiation:	ISM
Responsible for implementation:	IT staff, IT users

- (1) IT systems may only be connected to the data network operated by GWDG via the infrastructure provided for this purpose. Set-up or use of additional network access (routers, switches, modems, WLAN access points, etc.) that is unauthorised or carried out without the prior consent of the network operator is prohibited.
- (2) The "Network Operation Regulation of the University Medical Center" and the "Usage Regulation of GWDG" must be observed during implementation.

A.13 Teleworking, mobile working and home office

Responsible for initiation:	Management
Responsible for implementation:	IT staff, IT users

- (1) In teleworking, mobile working and home office, data goes out of the spatially limited area of the data processing body.
- (2) For the establishment and operation of such workplaces, the existing company agreements² as well as further regulations on data protection and data security shall be observed.

A.14 Secure network usage - general requirements

Responsible for initiation:	ISM
Responsible for implementation:	IT staff, IT users

- (1) As far as technically possible, the use of encrypted communication services must be preferred over the use of unencrypted services.
- (2) The transmission of sensitive data must be encrypted or secured by other appropriate measures (e.g., isolated separate networks).

² See appendix "Related documents"

A.15 Secure network usage - email

Responsible for initiation:	ISM
Responsible for implementation:	IT staff, IT users

- (1) Only official email accounts may be used for official email communication.
- (2) Automated forwarding of official emails to external providers (Internet providers) is not permitted.
- (3) Existing technical solutions for secure and encrypted data transmission or data provision must be used for the electronic forwarding of sensitive data.
- (4) If official emails are accessed from outside GWDG or networks operated by GWDG, it is mandatory to use encrypted transmission protocols. The regulations laid down in measure (A.8) must be observed.
- (5) If official emails are accessed from IT systems not operated by GWDG, it must be ensured that no content remains on the external systems after use.
- (6) It is generally prohibited to log in via Internet links stored in emails. This does not apply to emails that have been triggered to verify identity by one's own actions when registering for services.
- (7) It is expressly prohibited to respond to requests contained in emails for the disclosure of login data.
- (8) Attachments and Internet links received by email can be opened only if their harmlessness can be assumed, e.g., through their origin and context.

A.16 Data storage

Responsible for initiation:	Specialists responsible
Responsible for implementation:	IT staff

- (1) Official data must always be stored within the IT systems of GWDG.
- (2) The options of storing data on central servers must be used.
- (3) Storing of sensitive data on the hard disk of the workstation computer or on other local storage media is permitted only if the operational concept for the respective data set allows this and if the security measures specified therein have been taken.
- (4) Storing (and processing) of official data outside the IT systems of GWDG (e.g., on cloud services or private devices) is permitted only if this is required for official purposes and if the operational concept for the respective data set allows such storage. If data is stored externally, then it must be protected against loss of data, confidentiality and data integrity in a manner appropriate to the protection requirement. It must be possible to recover and delete data from an external storage.
- (5) Storing of sensitive data outside the IT systems of GWDG is permitted only in the states of the European Economic Area and secure third countries in accordance with the data protection law.

- (6) The synchronisation of e-mails on private devices and the associated data storage shall be permitted as long as it is not to be expected that e-mails contain contents requiring special protection in terms of data protection or other confidentiality requirements. Synchronisation on private devices is not permitted for e-mail accounts for which it is to be expected that e-mails contain contents requiring special protection in terms of data protection or other confidentiality requirements due to the function of the account holder.

A.17 Use of external communication services

Responsible for initiation:	ISM
Responsible for implementation:	IT users

- (1) The use of external communications services (e.g., Skype, Teamviewer) enables via the internet access to IT systems of GWDG.
- (2) The use of such services is permitted only if the operational concepts for the data processed on the computer used and the used sub-areas of the infrastructure allow such use.

A.18 Use of private hardware and software

Responsible for initiation:	ISM
Responsible for implementation:	IT users

- (1) Using private hardware and software in connection with the official data or IT infrastructure of GWDG is permitted only if the operational concepts for the respective data or sub-area of the infrastructure allow it.
- (2) Using private devices in designated areas and at designated connections especially in libraries, connections for lecturers in lecture halls and seminar rooms, in student work areas or guest networks and generally in the eduroam and GuestOnCampus wireless networks of GWDG is expressly permitted.
- (3) Admission of private devices in other parts of the infrastructure of GWDG necessarily presupposes that the end devices connected there meet the requirements of the catalogues of measures for basic IT protection of GWDG.
- (4) A.16 must be observed when storing and processing official data on private hardware.
- (5) The ISM must be informed in the event of loss of private hardware on which official data was stored. If personal data are affected by the loss, the DSM must also be informed.

A.19 Data backup and archiving

Responsible for initiation:	Specialists responsible
Responsible for implementation:	IT staff, specialists responsible

- (1) Data must be protected against loss resulting from faulty operation, technical faults, etc. To do so, data backups (creating copies of the data on separate storage systems) must be performed on a regular basis.

- (2) If storage on central servers with regulated data backup is not possible, the respective specialists responsible are responsible for data backups.
- (3) In the case of central data backup, specialists responsible must learn about the applicable regulations for data backup frequency and procedure.
- (4) The long-term archiving of academic data must be distinguished from a data backup for protecting data against loss. This must be ensured by specialists responsible.

A.20 Handling data storage devices

Responsible for initiation:	Specialists responsible
Responsible for implementation:	Specialists responsible

- (1) Data storage devices must be stored in secure locations. Data storage device safes must be procured if necessary.
- (2) Furthermore, data storage devices must be marked if the identification of the data storage device is not carried out by a different technical procedure.
- (3) Data storage devices must be protected from damage during transport. Encryption is required for sensitive data.

A.21 Deletion and disposal of data storage devices und confidential papers

Responsible for initiation:	Specialists responsible
Responsible for implementation:	IT staff, IT users

- (1) Data storage devices containing sensitive data must be securely deleted before being passed on to unauthorised persons. This can be done with suitable programmes or other suitable technical measures (e.g., with a device for magnetic flood erasure for hard disks and magnetic tapes).
- (2) Data storage devices that need to be discarded or are defective must be rendered completely illegible if they contain or have contained sensitive data.
- (3) Papers with confidential content shall be destroyed using a shredder that meets the protection requirements. Alternatively, disposal may also be carried out centrally by a service provider.
- (4) In the case of disposal via a service provider, the regulations of the GWDG and the requirements of the institutions authorised to use the data must be observed.
- (5) Further information can be obtained from the GWDG's data protection officer at the User Service and Operational Services Working Group.

I. Measures for IT staff

I.1 Early consideration of information security issues

Responsible for initiation:	Management
Responsible for implementation:	IT staff, IT users

- (1) Issues related to information security and data protection must be taken into account at the planning stage itself when new IT systems have to be procured or significant changes have to be made to IT procedures.
- (2) Insofar as personal data is processed, the competent Data Protection Officer must also be involved from an early stage.

I.2 Definition of responsibilities and role separation

Responsible for initiation:	Specialists responsible
Responsible for implementation:	IT staff, IT users

- (1) For each IT process, responsibilities must be clearly defined in the respective operational concepts.
- (2) Conflicts in task assignments and areas of responsibility should be prevented by separating roles. In particular, a role concept must ensure the separation of roles for all administrative applications that must comply with legal requirements and applications with an increased need for protection.
- (3) Each person must be informed of the responsibilities assigned to him/her and the provisions concerning him/her.

I.3 Documentation and description of IT procedures

Responsible for initiation:	Management
Responsible for implementation:	Specialists responsible

- (1) Documentation and description must be prepared in order to ensure information security of an IT procedure. This particularly includes the following information:
 - (a) Purpose of the procedure
 - (b) System overview, network plan
 - (c) Interfaces to other procedures
 - (d) Data description
 - (e) Delegation/deputisation regulations, particularly in the administration area
 - (f) Access rights
 - (g) Organisation, responsibility and execution of data backup
 - (h) Installation and release of software including software updates
 - (i) Purpose, release and use of self-created programs
 - (j) Instructions

- (k) Work instructions for administrative and similar tasks
- (l) All types of information security events that occur
- (m) Emergency procedures
- (n) Maintenance agreements
- (o) Description of processing operations in accordance with Art. 30 GDPR

I.4 Documentation of information security events and incidents

Responsible for initiation:	ISM
Responsible for implementation:	IT staff, IT users

- (1) Information security events and incidents must be documented by the competent IT staff and immediately reported to the ISM.

I.5 Regulations on order processing

Responsible for initiation:	Specialists responsible
Responsible for implementation:	Specialists responsible

- (1) A written agreement is required for all IT procedures operated on behalf of GWDG by others or by GWDG on behalf of others. The responsibility for information security and the corresponding control options must be clearly assigned.
- (2) Regulations of the GDPR (particularly Art. 28) must be observed if personal data is processed in the context of order processing. The Data Protection Officer of GWDG must be involved.

I.6 Standards for technical equipment and configuration

Responsible for initiation:	Management
Responsible for implementation:	Specialists responsible, IT staff

- (1) Standardisation of technical equipment and configuration should be sought in order to achieve an appropriate security level for IT systems. The ISB and professionally qualified IT staff of the GWDG advise the operators of IT procedures.

I.7 Provision of central IT services

Responsible for initiation:	Management
Responsible for implementation:	Specialists responsible

- (1) Central IT services, such as user service, data backup measures, storage of data on central file servers, execution of programs on application servers, software distribution, software updates, software inventory and software license management, as well as email, support smooth IT use and improve the level of information security. Corresponding services must be offered centrally as far as possible.
- (2) Protection measures against malware must also be centralised.
- (3) For installation and inventory tools that are used across the network and for remote access, for example by the user service, special protection measures must be taken to prevent misuse. Users must be informed before such tools are used.

- (4) If the GWDG operates IT systems on behalf of third parties or provides facilities for the operation of IT systems to third parties in the infrastructure of the GWDG within the framework of hosting or housing, the implementation of this information security policy and supplementary regulations of the GWDG on information security shall be sought in the contractual regulations. Any deviations must be specified in writing when the contract is accepted.

I.8 Use of central services

Responsible for initiation:	Management
Responsible for implementation:	IT staff

- (1) The central provision of essential IT services will relieve the GWDG's employees so that they can better fulfil their actual tasks. Improved information security is achieved by centralising IT services.
- (2) GWDG's employees should use the central IT services. They may operate their own IT systems only if corresponding central IT services are not available for their tasks.

I.9 Delegation/deputisation

Responsible for initiation:	Management / Specialist responsible
Responsible for implementation:	Management

- (1) Delegation regulations are required for all tasks performed by the IT staff. Deputies must master all tasks required for this; work instructions and documentation must be made available to them.
- (2) The delegation regulation must be mapped in the system and must not take place by sharing passwords. This does not apply to system-specific, non-personal user accounts (for example root on UNIX systems). In this case, the deputy must be able to access the password of the user account stored in a suitable place only when necessary.
- (3) Compliance with the requirements for role separation must be ensured.

I.10 Qualification

Responsible for initiation:	Management / Specialist responsible
Responsible for implementation:	Management

- (1) The IT staff may work on IT procedures only after receiving adequate training.
- (2) Training must also include the applicable security measures, legal framework conditions and data protection requirements.
- (3) Continuous advanced training of the IT staff in all matters relating to their area of responsibility must be ensured.

I.11 Basic measures

Responsible for initiation:	Management
Responsible for implementation:	Security Officer

- (1) A large number of structural and technical specifications must be observed to secure the IT infrastructure. Technical measures for infrastructure are described in BSI's (Federal Office for Information Security)³ basic protection compendium for example. The fire brigade is responsible for fire protection and the Security Officer of GWDG and the responsible offices of the landlords are responsible for other security infrastructure. The following measures must be observed for securing the IT infrastructure:
 - (a) Uninterruptible Power Supply (UPS)
 - (b) Fire protection
 - (c) Protection against water damage
 - (d) Protected cable routing

I.12 Securing server rooms

Responsible for initiation:	ISM
Responsible for implementation:	Real Estate and Facilities Management

- (1) All IT systems with typical server function, including peripheral devices (consoles, external disks, drives, etc.), must be installed in separate, specially secured rooms.
- (2) Access to these rooms by unauthorised persons must be reliably prevented.
- (3) It is necessary to determine which server rooms cleaning and external service staff are permitted to enter only under supervision.
- (4) The doors shall only be openable by means of suitable locking systems and shall close automatically; the keys used must be copy-protected.
- (5) Key management requires special regulations that prevent keys from being handed over to unauthorised persons. Access must be limited to those who need access to the rooms due to the nature of their work.
- (6) Depending on the need for protection and external conditions (public accessibility, position towards the street, etc.), special structural measures, such as burglar-proof windows and doors, motion detectors, etc., must be provided to prevent forced entry.

I.13 Securing network nodes

Responsible for initiation:	Real Estate and Facilities Management
Responsible for implementation:	Real Estate and Facilities Management

- (1) Networking infrastructure (switches, routers, wiring centres etc.) must be set up in closed rooms or in closed cabinets in areas that are not accessible to public. These

³ See <https://www.bsi.bund.de/grundschutz>

rooms or cabinets must be protected against unauthorised access and destruction. Measure (I.12) shall apply accordingly.

I.14 Cabling and wireless networks

Responsible for initiation:	Management
Responsible for implementation:	Specialists responsible

- (1) The network infrastructure must be clearly structured and its documentation must be up-to-date and complete.
- (2) Requests for extensions and changes to the network infrastructure (e.g., cabling, network distributors, wireless networks) must be submitted to the working group IT-Infrastructure.

I.15 Induction and supervision of external staff

Responsible for initiation:	ISM
Responsible for implementation:	Specialists responsible

- (1) External staff that has to work in secure rooms that have IT equipment (e.g., server rooms) must be supervised and the work must be documented.
- (2) Supervision may be waived for regularly deployed, instructed and committed external personnel. The exceptions have to be documented.
- (3) Non-specialist persons (e.g., cleaning staff), who needs to access secure IT rooms, must be instructed on how to handle the IT equipment.
- (4) If there is a possibility of the external staff accessing sensitive data, even if during remote maintenance, they must be obliged to maintain data secrecy. They must also be obliged to maintain data secrecy when accessing personal data. Contracts for maintenance and service must then be concluded in accordance with Art. 28 GDPR.

I.16 Procurement, software development

Responsible for initiation:	ISM
Responsible for implementation:	Specialists responsible

- (1) The procurement of software and hardware and the development of software must be coordinated with the competent ISB. In the process, standards according to I.6 and state of the art security measures must be observed. The specialist and technical requirements must be specified in advance.

I.17 Controlled use of software

Responsible for initiation:	ISM
Responsible for implementation:	IT staff

- (1) Only software that is required to perform official tasks may be installed on the IT systems of GWDG.

- (2) Using software from the Internet, or launching software received via email, is permitted only if it is ensured that this software does not pose a risk to the IT systems or data network.
- (3) Consent of the management must be obtained in case of doubt. The ISB can advise the management if needed.

I.18 Separate development environment

Responsible for initiation:	ISM
Responsible for implementation:	IT staff

- (1) The development or customisation especially of server-based software must not be carried out in the production environment. Transferring the software from development to production facilities requires the approval of the competent specialists responsible.

I.19 Protection against malware

Responsible for initiation:	ISM
Responsible for implementation:	IT staff

- (1) A virus scanner, which automatically checks all incoming data and files, must be installed on all workstation computers. The virus scanner, including signatures, must be updated regularly (if possible, in an automated manner).
- (2) The use of virus scanners must be checked for all other IT systems (e.g., servers, measurement and control computers) and carried out as far as appropriate and technically possible.
- (3) If malicious program code is detected on a system, this must be reported to the competent ISM and the outcome of the measures taken must be documented.
- (4) A malware search must be carried out on all IT systems at risk at regular intervals as well as when there is a specific requirement or suspicion; the results must be documented.
- (5) Software updates provided by manufacturers to eliminate security gaps must be installed promptly, provided that no problems with the update are apparent.
- (6) Operating systems and applications for which manufacturers no longer provide software updates must not be used on the data network. If, for overriding reasons, the continued usage of such systems cannot be avoided, these systems must be documented, and operational concepts must be developed for their continued usage and submitted to the ISB for his/her statement.
- (7) Applications, especially network applications such as mail programs and web browsers, must be configured securely.
- (8) Applications are to be executed with the minimum required rights in the operating system.

I.20 Interfaces for external data storage devices in case of increased protection requirement

Responsible for initiation:	Specialists responsible
Responsible for implementation:	IT staff

- (1) If there is an increased protection requirement, all external accesses to the PC (e.g., CD drives, USB ports, removable storage devices, wireless connections) must be removed, blocked or controlled if they are not required for official tasks. The possibility of using application servers and drive-less workstations or terminals is to be examined.
- (2) Access to the computer BIOS must be protected by a password.

I.21 Failure safety

Responsible for initiation:	ISM
Responsible for implementation:	IT service providers, IT staff

- (1) Failure safety measures must be taken in accordance with the respective requirement.
- (2) IT systems that are necessary to maintain orderly operation must be kept adequately available by means of fallback solutions (e.g., through redundant system design or use of similar devices) or maintenance contracts with short response times.

I.22 Use of anti-theft devices

Responsible for initiation:	ISM
Responsible for implementation:	Real Estate and Facilities Management, IT staff

- (1) To reduce the risk of theft, anti-theft devices must be used at all places where things of significant value need to be protected and where other measures ((e.g., suitable access control to the workstations (see A.6)) cannot be implemented or where there is a particular risk of theft (e.g., due to public traffic or fluctuation of users).
- (2) Data storage devices containing valuable research data and personal data must be adequately protected.

I.23 Personal user accounts (authentication)

Responsible for initiation:	ISM
Responsible for implementation:	IT staff

- (1) The following must be observed in addition to measure A.9:
- (2) Each person should only be assigned one user account. The assignment of several user accounts to one person within an IT system should take place if special roles are mapped and special rights are assigned via the additional accounts. The additional accounts should also be allocated per person.

- (3) The creation and activation of a user account may only take place in a regulated procedure. The creation and activation must be documented.
- (4) Pre-installed standard accounts are to be deactivated or deleted if not required.

I.24 Administrator accounts

Responsible for initiation:	ISM
Responsible for implementation:	IT staff

- (1) Administrators receive a personal administrator account for their tasks. The use of this administrator account must be restricted to the tasks for which administrator rights are required. User accounts without administrator rights must be used for non-administrative work.
- (2) Predefined administrator accounts must be renamed as far as technically possible so that their meaning is not immediately evident.

I.25 Administration of user accounts upon entry, change or withdrawal

Responsible for initiation:	Management
Responsible for implementation:	Management, superior of the person leaving the organisation

- (1) In the organisational procedure, a process for the administration of user accounts and user rights must be reliably established when a person joins, is reassigned within or leaves.
- (2) In the event of an organisational change or if a person leaves, the management has to decide on the use of the official data that is assigned to that person's user account.
- (3) All authorisations for admission and access rights set up for the reassigned or leaving person must be withdrawn or deleted.
- (4) In exceptional cases, if user accounts for an IT system have been shared between several persons, the password must be changed after one of the persons is reassigned or leaves.

I.26 Passwords

Responsible for initiation:	ISM
Responsible for implementation:	IT staff, IT users

- (1) In addition to the provisions laid down in measure A.12, IT staff must also observe the following:
 - (a) Increased requirements are to be placed on the authentication process for privileged accounts. A multi-factor authentication should preferably be enforced here. If this is not technically possible, at least a higher password strength (complexity and/or length of the password) must be prescribed and enforced as far as technically possible.
 - (b) Preset passwords (e.g., set by the manufacturer when systems are delivered) must be immediately replaced with individual passwords.

- (2) If technically feasible, the following framework specifications must be observed:
 - (a) The technical options for enforcing compliance with password policies must be activated.
 - (b) Every user must be able to change their own password at any time.
 - (c) Passwords must be assigned for the signup of new users. These passwords must be changed after being used once.
 - (d) The number of incorrect login attempts on a system within a period must be limited. If no other algorithms are available for the limitation, the limitation can be done by blocking the account, which can either only be lifted by the system administrator or is time-limited.
 - (e) Measures should be taken to detect password compromise.
 - (f) During authentication in networked systems, passwords may only be transmitted in encrypted form. Only one-time passwords are used in networks in which passwords have to be transmitted without encryption.
 - (g) When a password is entered, it must not be displayed on the screen.
 - (h) Passwords must be securely stored in the system, e.g., by means of one-way encryption.
 - (i) Repetition of old passwords during a password change must be prevented by the IT system (password history).
 - (j) For deployment scenarios with different security requirements, the option of using different passwords or authentication methods shall be provided.
- (3) If the system itself cannot enforce compliance with password policies, suitable organisational measures must be taken to inform users of the password policies and to oblige them to comply with these.
- (4) Deviations from the rules mentioned in Sentences (1) and (2) are permitted only for systems for which special password policies expressly allow this.
- (5) The use of alternatives and extensions (multi-factor procedures) for authentication using passwords is to be used where technically feasible, if such procedures should or must ensure increased protection. For applications with normal protection requirements, the use of multi-factor methods should be checked and used if possible.

I.27 Access rights

Responsible for initiation: Management
Responsible for implementation: IT staff

- (1) Access rights determine which persons are authorised to use IT systems, IT applications or data within the scope of their functions. The user may work with only those access rights that are intended for the performance of his/her tasks.
- (2) The procedures for granting access rights as well as the documentation of the granting and of the rights must be defined technically and organisationally.

- (3) It is necessary to examine the extent to which access authorisation can be limited to specific end devices.
- (4) It is also necessary to examine the extent to which access authorisation can or must be limited to specific times (e.g., restricted to normal working hours).
- (5) For users with privileged rights, especially for administrator accounts, access must be limited to the required systems (usually the server and end devices or applications in question).
- (6) For all administrative applications that have to comply with legal requirements (data protection, commercial code, etc.), the access rights for individual users are granted and modified when the users submit a written request. Separation of roles must be taken into account when granting access rights; administrators are not allowed to manage their rights themselves.

I.28 Locking, logging out and shutting down

Responsible for initiation:	ISM
Responsible for implementation:	IT staff, IT users

- (1) The following applies in addition to (A.6):
- (2) As far as technically feasible, the activation of automatic locking must be configured centrally.

I.29 Teleworking, mobile working and home office

Responsible for initiation:	Management
Responsible for implementation:	IT staff, IT users

- (1) The following applies in addition to A.13:
- (2) Appropriate technical measures must be taken to ensure that
 - (a) confidentiality and integrity of the data transferred during the communication between the external workplace and the office are guaranteed,
 - (b) only authorised persons can access official data from home,
 - (c) official data at the external workplace is treated confidentially and
 - (d) the entire process of external work meets existing revision security requirements.
- (3) The existing company agreements⁴ must be observed when setting up and working on external workplaces.
- (4) If personal data is processed during external working, the Data Protection Officer must be involved in the approval process.

⁴ See appendix "Related documents"

I.30 Need for logging and monitoring

Responsible for initiation:	ISM / specialists responsible
Responsible for implementation:	IT staff

- (1) Appropriate logging, auditing and inspection are essential aspects of information security. An evaluation of such protocols using suitable tools makes it possible to ascertain whether, for example, the bandwidth of the network corresponds to the current requirements or whether systematic attacks on the network can be identified.
- (2) Depending on the use of an IT procedure, adequate logging measures must be taken to ensure data security, data protection and inspection capability.
- (3) Depending on the data logged, the evaluation of the log files must be coordinated with the Data Protection Officer and the works council.

I.31 Logging on servers and in case of application programs

Responsible for initiation:	ISM / specialists responsible
Responsible for implementation:	IT staff

- (1) Depending on the capabilities of the operating system, the services and the applications, all access attempts, both successful and unsuccessful, must be logged automatically.
- (2) Changes to the parameters of system services and application programs, the booting and shut down of the IT system or system services as well as security-related events must be logged.
- (3) The principle of purpose limitation as per Art. 5 Section 1 Letter b) GDPR and the principle of data minimisation as per Art. 5 Section 1 Letter c) GDPR as well as the storage limitation according to Art. 5 Section 1 Letter e) GDPR must be observed.
- (4) If technically possible, the logs must be stored on dedicated servers.
- (5) They must be evaluated regularly and immediately after they are created. Hereby must be ensured that only those persons, who need the logs to complete the tasks assigned to them by the competent body, have access to them.

I.32 Logging of administrative activities

Responsible for initiation:	ISM
Responsible for implementation:	IT staff

- (1) Depending on the protection requirement of the procedure or of the data to be processed, administrators must be obliged by organisational regulations (instructions, etc.) to log the activities they carry out within the scope of their tasks. As far as possible, logging should take place automatically in the system.

I.33 Secure network administration

Responsible for initiation: ISM
Responsible for implementation: IT staff

- (1) It must be regulated in operating and security concepts and ensured that network administration is carried out by designated IT staff only.
- (2) Active and passive network components and servers must be protected against unauthorised access.
- (3) Network documentation must be kept locked and protected from unauthorised access.

I.34 Network monitoring

Responsible for initiation: ISM
Responsible for implementation: IT staff

- (1) Suitable measures must be taken to detect and localise overloading and faults in the network at an early stage.
- (2) It must be regulated in operating and security concepts and verified that the tools and data used for this purpose can be accessed by authorised persons only.
- (3) The group of authorised persons must be limited to the necessary number.

I.35 Controlled network accesses

Responsible for initiation: ISM
Responsible for implementation: IT staff

- (1) Unauthorised use of network access must be prevented by means of organisational and technical measures.

I.36 Division into areas based on varying protection requirements

Responsible for initiation: ISM
Responsible for implementation: Specialists responsible

- (1) The data network must be structured such that different IT systems have different sub-networks commensurate to their respective protection requirements.
- (2) IT systems with varying protection requirements must not be operated in the same sub-network. This way, IT systems with a higher protection requirement are not endangered by insufficiently secured systems in the same subnet or by insufficient protection measures at network ports. Conversely, this also ensures that the use of IT systems with a lower protection requirement is not made unnecessarily difficult because other IT systems with higher protection requirements in the same subnet have to be taken into account.

I.37 Controlled communication channels

Responsible for initiation:	ISM
Responsible for implementation:	Specialists responsible

- (1) All communication between the various sub-networks of GWDG or with external parties may only take place via controlled channels that are managed by special protection systems (Firewall, proxy, etc.).
- (2) Protection systems must be configured such that only desired communications are possible (whitelisting), thus preventing unnecessary communications and minimising attack targets.
- (3) Besides the network connections of GWDG, the installation and operation of other communication connections are generally not permitted. If the installation of other communication channels cannot be avoided due to special circumstances (e.g., operating a modem for remote maintenance purposes), this requires prior approval of the network operator. I.15 must be observed for access by external service providers.

I.38 Secured transmission procedure

Responsible for initiation:	ISM
Responsible for implementation:	Specialists responsible

- (1) If technically feasible, encrypted transmission procedures must be used for electronic communication.
- (2) Sensitive data must be transmitted in encrypted form.
- (3) Encrypted transmission procedures must be used for administrative activities and remote maintenance.

I.39 Organisation of data backups

Responsible for initiation:	Specialists responsible
Responsible for implementation:	IT staff

- (1) Data backups must be carried out according to a documented data backup concept that is in line with the protection requirement of the data to be backed up. The data backup concept includes all data backup regulations (which data is backed up by whom, using which method, when, how often and where).
- (2) In the case of personal data, the required or permitted retention periods must be observed.
- (3) Original data and backup copies must be kept in separate fire-protected areas.
- (4) As a rule, data must be stored on central file servers, on which a central data backup takes place on a regular basis. If storage on central file servers is currently not possible, a suitable data backup must be set up for the local system.
- (5) In order to minimise recovery times, the extent to which system and program areas are also backed up along with data must be checked.

- (6) The configurations of all active network components must be included in a regular data backup that takes place at least once daily.

I.40 User information for data backups

Responsible for initiation: Specialists responsible
Responsible for implementation: IT staff

- (1) All users, who can use data backup systems, must be informed about the data backup regulations so that they can point out deficiencies (e.g., unsuitable time interval for their needs) or make individual additions if necessary.

I.41 Verification of data backups

Responsible for initiation: Specialists responsible
Responsible for implementation: IT staff

- (1) The consistency of data backup runs must be ensured by checking the readability of the data backup. Data backups must be restored on a test basis at least once a year to a reasonable extent.

I.42 Deletion and disposal of data storage devices and confidential documents

Responsible for initiation: Specialists responsible
Responsible for implementation: IT staff, IT users

- (1) The following applies in addition to A.21:
- (2) Repairing of damaged data storage devices on which sensitive data is stored is permitted only in particularly justified exceptional cases.
- (3) If data storage devices can only be repaired by external service providers, the contractor must be obliged to maintain data confidentiality. The obligation must be a part of the written agreement.
- (4) DIN 66399 must be observed when procuring shredders.
- (5) If documents have to be disposed via a service provider, it must be ensured that the contractor is certified for this. The contractor must be obliged to log the destruction.

V. Measures for administration and management

V.1 Review during recruitment

Responsible for initiation:
Responsible for implementation:

- (1) Qualifications and skills should be verified before recruitment.
- (2) Verification of information also serves to check trustworthiness.
- (3) Additional checks (e.g., police clearance certificates) should be carried out for staff who are required to meet special trustworthiness requirements due to their intended activities.

V.2 Briefing on recruitment

Responsible for initiation:
Responsible for implementation:

- (1) After recruitment, it must be ensured immediately that newly recruited staff are familiarised with the information security policy and are committed to it.
- (2) It must be ensured that newly hired personnel and personnel whose task assignment has been changed are instructed in the operating concepts that are relevant to the assigned tasks.
- (3) Special authorizations should only be granted if appropriate instruction has been given and competence for the assigned task has been ensured.

V.3 Regular training of personnel

Responsible for initiation:
Responsible for implementation:

- (1) Basic training on information security should take place regularly as mandatory face-to-face training or online training.
- (2) Training for specific information systems should be carried out in accordance with the specifications of the respective operating concepts.

V.4 Substitution regulations

Responsible for initiation:
Responsible for implementation:

- (1) Superiors must ensure that appropriate substitution regulations are ensured for all areas of responsibility.
- (2) Substitution regulations are to be documented.

Addendum 2 Applicable documents

- Company agreement on mobile working (s. <https://www.gwdg.de/about-us/company-internal-regulations/mobile-working>)
- Network operating regulations of the University Medical Centre (s. https://it.umg.eu/de/media/content/NETZE_betriebshandbuch_netzbetriebsordnung.pdf)
- Terms of Use of the GWDG (s. <https://www.gwdg.de/web/guest/about-us/catalog/terms-and-conditions/terms-of-use>)

Addendum 3 Glossary

Application

A computer program or a set of interacting computer programs that are used to execute IT procedures.

Application server

A server, on which applications (instead of a workstation computer) are running.

Dataset

A set of digitally stored data.

Data archiving

Is data storage on a system that is intended for long-term storage of data.

For research data in particular, data archiving requires the storage of additional data (metadata) to describe the data content and data format.

Data backup

Creation of additional copies of data on separate data storage devices as protection against data loss through hardware damage or accidental deletion.

Data backups usually protect against loss through accidental deletion only for a limited time because data backup procedures usually also delete copies of deleted data from the data backup data storage device after a predefined time.

Data storage

Is the process in which data is written on a data storage device.

Data storage device

Media on which data is stored, e.g., hard disks, disks, USB sticks, memory cards.

Increased need for protection

Summary for high or very high protection needs as opposed to normal protection needs.

Threat

a) Current threat:

A threat in which the impact of the damaging event has already begun or in which this impact is imminent immediately or in the very near future with a probability bordering on certainty.

b) Significant threat:

A threat to an important legal asset such as life, health, freedom, not insignificant assets and other goods protected by criminal law.

Hosting

Operation of third-party virtual IT systems (guests) on IT systems (hosts) of the GWDG.

Housing

Operation of physical IT systems of third parties in the IT infrastructure of the GWDG.

Information security events

(According to ISO27000) Detected occurrence of a system, service or network condition that indicates a possible violation of the information security policy, the failure of measures or a previously unknown situation that could be security-relevant.

Information security incidents

(According to ISO27000) Individual or a series of undesirable or unexpected information security events with a significant probability that business processes will be compromised and information security will be threatened.

Initiation

Under "Responsible for initiation", the catalogue of measures for basic IT protection specifies which person is responsible for starting and implementing a measure.

IT users (german: IT-Anwender)

Users of an IT system with a non-privileged user account who only use computers, operating systems and applications provided by other entities to process their data and to carry out their tasks.

IT staff

IT staff includes all employees of GWDG who are entrusted with the performance of tasks in the planning, support, maintenance and administration of IT systems that go beyond the mere use of IT systems. Here, it is irrelevant whether these people perform these activities as their main job. In particular, all persons with rights to change the installation of operating systems and applications on IT systems are considered as IT staff.

IT system

An IT system or information technology system is understood as an electronic data-processing system. This includes any computer from smartphones to mainframes, but also combinations of individual devices to form a composite system for joint data processing.

IT procedure

Defined procedure for electronic data processing including electronic communication.

Network operators

Groups and their employees entrusted by GWDG with the installation and operation of data networks.

Users (german: Nutzerinnen und Nutzer)

People who use an IT system for electronic data processing.

User ID

The name assigned to a user in an IT system.

User account

A representation of a user within an IT system, which is usually associated with a user ID and login data for the system and through which objects and rights in the IT system can be assigned to the user.

User account, privileged

Special user account that is associated with elevated rights in the IT system. This particularly also includes user accounts that have rights to install or modify the operating system or applications.

Risk acceptance

(According to ISO 27000) An informed decision to bear a specific risk.

Risk mitigation

Mitigation of risks through measures that reduce the probability of occurrence or extent of damage.

Risk transfer

Transfer of risks to others (e.g., through insurance).

Risk avoidance

(According to ISO 27000) Avoiding a risk by deciding not to start or continue the activity that gives rise to the risk.

Sensitive data

Sensitive data within the context of this information security policy is particularly

- Personal data pursuant to Art. 4 No. 1 GDPR (e.g., student data, staff data, patient data),
- Business data (e.g., financial data, confidential internal information/protocols),
- Patents as well as
- in individual cases, other data that has been classified as sensitive by an IT user (e.g., research results).

Transfer of data

Copy processes from one IT system to another via data networks.

Login data

Information that is used to verify a user's identity when the user accesses his/her user account, for example passwords and PINs, cryptographic keys or biometric data.