



POLICY/INSTRUCTION (P/I) : 9.2/5

Privacy Policy

SUPERSEDES: P/I 9.2/4

APPLICABLE TO: All Metro Employees

1.0 POLICY

It is the policy of the Washington Metropolitan Area Transit Authority (Metro) to protect the privacy of individuals who are the subjects of records maintained by Metro in Systems of Records, by generally preventing the disclosure of records without the permission of the person who is the subject of the record and by providing individuals access to their information contained in Metro's Systems of Records an accounting of disclosures and an opportunity to request amendment of those records. Metro will interpret and apply this Policy/Instruction (P/I) consistent with the Federal Privacy Act, 5 U.S.C. § 552a, and federal practice.

2.0 PURPOSE

Metro, in the regular course of its business, receives information about individual customers, employees, and members of the public. Some of the information, if released, could harm these individuals and violate their privacy. This P/I establishes Metro's Privacy Policy and provides guidance on restricting access to records relating to individuals, guarantees the person who is the subject of a record access to the record, and establishes a procedure to correct any misstatements of fact contained in a record.

3.0 SCOPE

This P/I establishes a means to regulate the collection, use, and safeguarding of personal data. It applies to information in Systems of Records and is intended to protect individual privacy by establishing rules regarding the collection and use of data, as well as data subjects' rights, including penalties for violations and judicial review of Metro decisions.

4.0 DEFINITIONS

4.1 **Employee** - a person employed by Metro.

4.2 **Individual** - a natural, living person, but does not include a person doing business with Metro in the role of sole proprietor.

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4.3 **Maintain** - collect, use, or disseminate.

4.4 **Official Employment Records** - employment-related records maintained by the Department of Human Capital that may contain, for each employee, without limitation:

- (a) contact information (name, work and home contact information, and emergency contact information);
- (b) job details and history, including job title and organizational information, such as department, work location, shift, supervisor, and payroll status; and
- (c) other records related to the employee's employment with Metro, including but not limited to:
 - (1) application records;
 - (2) performance evaluations;
 - (3) payroll and compensation information;
 - (4) education and training records;
 - (5) records concerning job offers;
 - (6) promotion, demotion, transfer;
 - (7) layoff, separation, and termination; and
 - (8) warnings and disciplinary notices.

4.5 **Receipt** - receipt of a request by the Privacy Administrator, or the Chief People Officer in the case of requests for official employment records.

4.6 **Privacy Records** (Records) - any item collection, or grouping of information about an individual that is maintained by or for Metro, including, but not limited to, the individual's education, financial

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transactions, medical history, and criminal or employment history and that contains the individual's name, or the identifying number, symbol, or other identifying particular assigned to the individual, such as a finger or voice print or a photograph.

4.7 **Registered User** - an individual or entity that has registered their SmarTrip® card with Metro.

4.8 **Requester** - any person or entity (including corporations and federal, state, local, or foreign governments) who requests records under this P/I.

4.9 **Routine Use** - with respect to the disclosure of a record, the use of such record for a purpose that is compatible with the purpose for which it was collected.

4.10 **Statistical Record** - a record in a System of Records maintained for statistical research or reporting purposes only and not used in whole or in part in making any determination about an identifiable individual.

4.11 **System of Record** - a group of any records under the control of Metro or a Metro contractor from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifier assigned to the individual.

4.12 **System of Records Notice (SORN)** - a statement or other notice intended to inform the public about what kinds of records Metro maintains, the types of information contained in the records, how the records are used, and the routine use(s) of the records.

5.0 RESPONSIBILITY

5.1 Contracting Officers shall be responsible for ensuring that the appropriate requirements of this P/I are included in any contract, where a contractor is responsible for creating, operating, or maintaining a System of Records to accomplish a Metro function.

5.2 The Chief People Officer or designee shall be responsible for responding to requests relating to official employment records of former and current employees and for keeping a record of the actions taken in regard to requests regarding official employment records.

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- 5.3 The Department of Digital Modernization shall be responsible for posting a current copy of this P/I and a copy of each SORN on Metro's external website.
- 5.4 The Official Custodian of each department/office shall be responsible for complying with the record-keeping requirements of subsection 7.1, involving circumstances where records are disclosed; for placement of statements of disagreement in individual files and for ensuring that these are included with any disclosure of records in accordance with subsection 7.4; for identifying the circumstances when a SORN is required in accordance with subsection 7.6.2; and for drafting the proposed SORN, as required by subsection 7.6.3. In accordance with subsection 7.6.5, Official Custodians shall take reasonable steps to ensure that records which are disclosed, except in the case of routine uses, are accurate and complete. For purposes of this P/I, the Responsible Official shall be considered the Official Custodian unless the Responsible Official has designated a subordinate as the Official Custodian and so notified the Privacy Administrator. An Official Custodian must meet the qualification requirements and evaluation provisions of subsections 5.3(a) and (b) of P/I 9.3, Public Access to Records Policy (PARP).
- 5.5 The Privacy Administrator shall be responsible for administering this P/I. The Privacy Administrator shall ensure a timely response to requests for access to records; shall attempt to provide notice when records are released pursuant to compulsory legal process under subsection 7.6.7; shall review the SORNs drafted by Official Custodians as required by subsection 7.6.4; and shall ensure that the final SORNs are transmitted to the Department of Digital Modernization to be posted on Metro's external website.
- 5.6 A Responsible Official is the head of a Metro department or office (*e.g.*, an Executive Vice President, Senior Vice President, or Vice President) who shall be responsible for the implementation of this P/I for their department/office, including appointing an Official Custodian. Responsible Officials shall determine which personnel in their office or department must sign an Information Protection and Confidentiality Agreement, ensure that all such personnel execute an Information Protection and Confidentiality Agreement annually, and maintain copies of these agreements. Responsible Officials shall designate and supervise Official Custodians for their respective departments or offices. Responsible Officials shall notify the Privacy Administrator of the name, telephone number, facsimile

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number, and email address of the current Official Custodian for their respective departments or offices and shall update this information as necessary.

6.0 CONDITIONS OF DISCLOSURE

6.1 Metro shall not disclose any record that is contained in a System of Records by any means of communication to any person, or to another government agency, except pursuant to a written request by the individual to whom the record pertains or with their prior written authorization, as detailed in Section 7.2, unless disclosure of the record is:

- (a) to Metro personnel, Metro contractors, or agents who have a need for the record in the performance of their duties, which need should be related to the purpose for which the record is maintained;
- (b) for a routine use as defined in subsection 4.9 of this P/I and described under subsection 7.6.3 of this P/I;
- (c) to a Requester who has provided Metro with advanced, adequate written assurance that the record will be used solely as statistical research or reporting record, and the record is to be transferred in a form that is aggregated and/or not individually identifiable;
- (d) to an agency or an instrumentality of any federal, state, or local entity with jurisdiction within the transit zone for a civil or criminal law enforcement activity if the activity is authorized by law, and if the head of the agency or instrumentality has made a written request to Metro specifying the particular portion desired and the law enforcement activity for which the record is sought, and to any federal, state, or local law enforcement agency if the head of the agency establishes to Metro that the information is required in the course of an investigation where time is of the essence in preserving and protecting human life and/or public safety;

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- (e) to a person pursuant to a showing of compelling circumstances affecting the health or safety of an individual if, upon such disclosure, notification is transmitted to the last known address of such individual;
- (f) to either House of Congress, or, to the extent of matter within its jurisdiction, any committee or subcommittee thereof, any such joint committee of Congress or subcommittee of any such joint committee;
- (g) to the U.S. Comptroller General, or any of his authorized representatives, in the course of the performance of the duties of the Government Accountability Office, or to the Federal Transit Administration in the course of its audit activities;
- (h) pursuant to the order of a court of competent jurisdiction; or
- (i) required under Metro's Public Access to Records Policy.

6.2 Metro personnel shall not disclose or permit others to disclose to anyone outside Metro information obtained through their official position or work with Metro and not generally available to the public, except in the performance of their official duties or in connection with judicial proceedings, and in accordance with the provisions of this P/I and other relevant Metro rules and regulations. Any applicable statute, regulation, or Metro policy providing greater privacy protection controls over this P/I. Responsible Officials shall require their employees who have particularized access to sensitive information on either a recurring or a single-time basis to sign an Information Protection and Confidentiality Agreement by which they agree to comply with the requirements of this P/I, a sample of which is attached to this P/I. The Responsible Official or designee shall maintain a copy of the signed agreement.

7.0 EXCEPTIONS

7.1 Accounting of Certain Disclosures

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7.1.1 For disclosures made under subsection 6.1, except for disclosures made under subsections 6.1(a) and 6.1(i), with respect to each System of Records under its control, Metro shall keep an accurate accounting of:

- (a) the date, nature, and purpose of each disclosure of a record; and
- (b) the name and address of the person or agency to whom the disclosure is made.

7.1.2 Metro shall retain the accounting made under subsection 7.1.1 for at least five (5) years after the disclosure for which the accounting is made or, however long the record is ordinarily retained, whichever is longer.

7.1.3 Except for disclosures made under subsection 6.1(d), Metro shall make the accounting made under subsection 7.1.1 of this P/I available to the individual named in the record at their request.

7.1.4 Metro shall inform any person or agency to whom records have been disclosed of any correction or notation of dispute made by Metro in accordance with subsection 7.4 of this P/I.

7.2 Access to Records

7.2.1 Upon request by any individual to access their record or to amend any information pertaining to them that is contained in a System of Records, Metro shall permit the individual, and upon their request, a person of their own choosing to accompany them, to review the record and have a copy made of all or any portion thereof.

7.2.2 A request shall be made in writing or by e-mail and be directed to the Privacy Administrator, except for official employment records relating to former and current employees. In the case of official employment records relating to former and current employees, the request shall be directed to the Chief People Officer or designee. The Privacy Administrator, or the Chief People Officer in the case of official employment records, shall acknowledge receipt of a request within ten (10) working days of receipt and shall respond to the request within thirty (30) working days after the date the acknowledgment is mailed. If Metro refuses to disclose the record(s), it shall inform the individual of the reason for the refusal and the procedure for judicial review. No

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record shall be disclosed unless the requester demonstrates to Metro that the requester is who they claim to be. If the Requester appears in person, they must provide an identifying document containing a photograph issued by a recognized governmental organization. If the request is made in writing, the Requester must provide their full name, current address, date and place of birth, and must have the request notarized.

- 7.2.3 In the case of medical records regarding former or current employees, including psychological records, the decision to release directly to the individual or to withhold direct release shall be made by the Chief Medical Officer, Occupational Health and Wellness, or designee. If the Chief Medical Officer determines that direct release is reasonably likely to endanger the life or physical safety of the individual who is requesting access, release through the individual's chosen medical practitioner will be recommended.

7.3 Amendment to Records

- 7.3.1 An individual may request amendment of a record pertaining to such individual. The request must be in writing, must be addressed to the Privacy Administrator, or to the Chief People Officer in the case of official employment records, and must pertain solely to issues of fact. The request must contain any and all documentary evidence supporting the request for amendment.
- 7.3.2 No later than ten (10) working days after receipt, the Privacy Administrator, or the Chief People Officer in the case of official employment records, shall acknowledge such receipt.
- 7.3.3 In the case of official employment records, the Chief People Officer or designee shall determine whether the record shall be amended. In the case of other records, the Privacy Administrator shall transmit the request to the Official Custodian, who shall make the determination whether to amend the record.
- 7.3.4 No later than forty (40) working days after receipt, the Privacy Administrator, or the Chief People Officer or designee(s) in the case of official employment records, shall either:

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- (a) make any amendment of any portion thereof which the individual believes is not accurate, relevant, or complete, and shall provide notice of the correction to the individual; or
- (b) notify the individual of the refusal to amend the record in accordance with the request, the reason for the refusal, and the procedures for judicial review.

7.4 Statement of Disagreement

If Metro's decision is to refuse to amend a record, the individual may file with Metro a concise statement setting forth the reasons for the disagreement with Metro's refusal. In any disclosure by Metro containing information about which the individual has filed a statement of disagreement, Metro shall clearly note any portion of the record that is disputed and provide copies of the statement, and, at its discretion, a concise statement of the reasons for not making the requested amendment.

7.5 Administrative Review

- 7.5.1 An individual may seek administrative review of a denial of access to their records under subsection 7.2 of this P/I, or a refusal to amend records following a determination under subsection 7.3.4 of this P/I by filing a written appeal of the action with the Chief Customer Experience Officer within thirty (30) working days of the date of the denial letter.
- 7.5.2 The date of receipt of an appeal shall be the date it is received by the Chief Customer Experience Officer.
- 7.5.3 An appeal panel consisting of the Chief Customer Experience Officer or designee, the General Counsel or designee, and the relevant Responsible Official or designee shall be responsible for reviewing appeals. The appeal panel shall inform the Requester of its determination concerning the appeal within twenty (20) working days of receipt.
- 7.5.4 If the appeal panel grants the appeal, the Chief Customer Experience Officer or designee shall inform the Requester of the applicable conditions surrounding granting the request (e.g.,

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amendment of record) and the approximate date upon which compliance will be effected. If the appeal panel grants only a portion of the appeal, it shall treat the portion not granted as a denial.

7.5.5 If the appeal panel denies the appeal, either in part or in whole, the Chief Customer Experience Officer or designee shall inform the Requester of that decision and of the following:

- (a) the reasons for the denial;
- (b) the name and title or position of each person on the Appeal Panel; and
- (c) the right to judicial review.

7.5.6 Any attorney assigned to the appeals process shall not have had any involvement with the initial denial of the request.

7.5.7 The Requester must exhaust this administrative appeal process prior to seeking judicial review of a denial of access or refusal to amend.

7.6 Other Requirements and General Principles

7.6.1 Metro shall maintain in its records only such information about an individual as is relevant and necessary to accomplish a purpose in accordance with the Metro Compact.

7.6.2 Metro shall state on the form that it uses to collect the information for a System of Records or on a separate form that can be retained by the individual:

- (a) whether disclosure of such information is mandatory or voluntary;
- (b) the principal purpose or purposes for which the information is intended to be used;
- (c) a summary of the routine uses of the information; and
- (d) the effects, if any, of not providing all or any part of the requested information.

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When collecting personal information for a System of Records from an individual through verbal/oral communication, Metro shall, if feasible, provide the individual with a notice consistent with this subsection. The notice may be provided verbally.

7.6.3 Each department or office or equivalent that maintains a System of Records shall provide the Privacy Administrator with a written SORN stating:

- (a) the name and location of the system;
- (b) the categories of individuals for whom records are maintained in the system;
- (c) the categories of records maintained in the system;
- (d) each routine use of the records contained in the system, including the categories of users and the purpose of such use;
- (e) the policies and practices regarding storage, retrieval, access controls, retention, and disposal of the records, consistent with applicable Metro record retention policies;
- (f) the title and business address of the official who is responsible for the system;
- (g) Metro's procedures whereby an individual can be notified how to gain access to any record pertaining to him contained in the system, and how to contest its content; and
- (h) the categories of sources of records in the system.

7.6.4 A copy of each written SORN described in subsection 7.6.3 shall be submitted to the Privacy Administrator for their review, after which it shall be posted on Metro's public website. It shall also be made available for public review upon request.

7.6.5 Prior to disseminating any record about an individual, unless the dissemination is required under Metro's PARP pursuant to subsection 6.1(i), Metro shall make reasonable efforts to ensure that such records are accurate and complete.

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7.6.6 Metro shall maintain no record describing how any individual exercises rights guaranteed by the First Amendment unless expressly authorized by statute, by the individual about whom the record is maintained, or pertinent to and within the scope of an authorized law enforcement activity.

7.6.7 Metro shall make reasonable efforts to serve notice on an individual when any record about an individual is made available to any person under compulsory legal process, provided such process has become a matter of public record.

7.6.8 Metro shall establish appropriate administrative, technical, and physical safeguards to ensure the security and confidentiality of records and to protect against any anticipated threats or hazards to their security or integrity that could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual about whom information is maintained.

7.6.9 An individual's name and address may not be sold or rented by Metro unless such action is specifically authorized by law. This provision shall not be construed to require the withholding of names and addresses otherwise permitted to be made public.

7.6.10 A current copy of this P/I shall be posted on Metro's public website.

7.7 Coordination with Public Access Records Policy and with Collective Bargaining Agreements

7.7.1 Metro shall not rely on any exemption contained in the PARP to withhold from an individual any record about the individual that is otherwise accessible under the provisions of this P/I.

7.7.2 Metro shall not rely on any exemption in this P/I to withhold from an individual any record that is otherwise accessible to such individual under the provisions of the Public Access to Records Policy.

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7.7.3 In the event that there is a conflict between the provisions of this P/I and the provisions of any collective bargaining agreement, the provisions of the collective bargaining agreement shall govern.

8.0 FEES, JUDICIAL REVIEW, AND DISCIPLINE

8.1 Fees for copying records that are disclosed shall be assessed in accordance with the Metro Public Access to Records Policy, duplication rates in effect at the time the records are provided. No fee will be charged for searching for and reviewing the record. No fee will be charged for records furnished in response to a request from: an employee or former employee of Metro for his or her official employment records; a member of Congress for official use; a domestic governmental agency; or a court.

8.2 Whenever Metro:

- (a) makes a determination under subsection 7.3.4 of this P/I not to amend an individual's record in accordance with their request, or fails to make such review in conformity with that subsection;
- (b) refuses to grant an individual's request under subsection 7.2 of this P/I; or
- (c) fails to comply with any other provision of this P/I in such a way as to have an adverse effect on an individual,
- (d) the individual may bring a civil action, only for injunctive relief or a declaratory judgment, and only after exhausting the administrative review process in subsection 7.5 of this P/I.

Nothing in this P/I shall be construed to authorize any civil action for damages.

8.3 In any suit brought under the provisions of subsection 8.4, the court shall determine the matter de novo. The burden is on Metro to sustain its action. The court may assess against Metro reasonable attorney fees and other litigation costs reasonably incurred in any case under this subsection where

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the court determines both that Metro acted willfully and that the complainant has substantially prevailed.

8.4 In accordance with section 81 of the Metro Compact, an action to enforce this P/I may be brought in any state or federal court of the United States located in the District of Columbia, Maryland, or Virginia without regard to the amount in controversy, within two (2) years from the date on which the cause of action arises, except that where Metro has materially and willfully misrepresented any information required under this P/I to be disclosed to an individual and the information so misrepresented is material to establishment of the liability under this P/I, the action may be brought at any time within two (2) years after discovery by the individual of the misrepresentation.

8.5 Any Metro officer, employee, or agent who wrongfully and willfully denies a person access to a record about which they are the subject, or who willfully releases records other than in accordance with this P/I, or who unduly delays or refuses to cooperate with locating records shall be subject to discipline up to and including termination. Any employee who fails to complete an Information Protection and Confidentiality Agreement, as required by a Responsible Official, shall be subject to discipline.

9.0 EXEMPTIONS

9.1 Nothing in this P/I shall allow an individual the right to access a record, amend a record, or obtain an accounting of disclosures for:

- (a) any information compiled in reasonable anticipation of a civil action or proceeding, or where disclosure would violate applicable federal law;
- (b) investigatory material compiled solely for the purpose of determining suitability, eligibility, or qualifications for employment, personnel matters, or contracts, but only to the extent that the disclosure of such material would reveal the identity of a source who furnished information to Metro; or
- (c) testing or examination material used solely to determine individual qualifications for appointment or promotion in employment with Metro, the disclosure of which would compromise the objectivity or fairness of the testing or examination process.

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9.2 Metro may not share any information under a matching program, by which automated Systems of Records are compared, unless the requesting (i.e., recipient) agency enters into an agreement with Metro pursuant to 5 U.S.C. § 552a(o)(1) or, in the case of a state agency, under analogous state statutory authority.

9.3 No SmarTrip® information, including financial transaction information, may be released by Metro, unless the request is made (a) pursuant to a court order; (b) pursuant to a request from a law enforcement official pursuant to subsection 6.1(d) herein; (c) by the registered user of the SmarTrip® information/data upon proof of identity, in accordance with subsection 7.2.2, for release only to that user; and (d) at Metro's public website by the registered user, provided that the individual provides verification of identity and SmarTrip® card ownership consistent with current industry standards for comparable personal information. SmarTrip® information will not be released to a third party even with the written consent of the registered user, except in accordance with subsections 9.3(a) and (b) above.

9.4 Records maintained by the Metro Transit Police Department (MTPD) and which consist of (a) information compiled for the purpose of identifying individual criminal offenders and alleged offenders and consisting only of identifying data and notations of arrests, the nature and disposition of criminal charges, sentencing, confinement, release, and parole and probation status; (b) information compiled for the purpose of a criminal investigation, including reports of informants and investigators, and associated with an identifiable individual; or (c) reports identifiable to an individual compiled at any stage of the process of enforcement of the criminal laws from arrest or indictment through release from supervision, shall be exempt from making an accounting of disclosures available under subsections 7.1.3 and 7.1.4; from the rights of access (subsection 7.2), request for amendment (subsection 7.3), statement of disagreement (subsection 7.4) and judicial review (subsections 8.2 - 8.4); and from the principal and routine uses in subsections 7.6.1, 7.6.2, 7.6.3(h), and 7.6.7.

9.5 Investigative files, including subject/title index, maintained by the Office of Inspector General (OIG) that consist of (a) all records compiled for the purpose of conducting investigations and/or supporting any enforcement actions (whether criminal, civil or administrative) that result from such investigations; and (b) the OIG Hotline Complaint Files, including subject/title index, shall be exempt from making an accounting of disclosures available under subsection 7.1.3, from the rights of access (subsection 7.2),

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and judicial review (subsections 8.2-8.4); and from the principles of subsections 7.6.1, 7.6.2, 7.6.3(h), and 7.6.7. Investigative files shall also be exempt from notification of disclosure (subsection 7.1.4), request for amendment (subsection 7.3) and statement of disagreement (subsection 7.4), except with respect to final reports of Investigation in non-criminal investigations which are required to be made public pursuant to the PARP.

9.6 The Responsible Official shall provide the Privacy Administrator with a written justification for why any System of Records should be deemed exempt from any part of this P/I. The Privacy Administrator shall determine whether any System of Records is exempt from any of the requirements of this P/I.

9.7 Requests for access to records containing protected health information (PHI) governed by the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA), as amended, shall be disclosed only in accordance with applicable HIPAA rules and relevant Metro policies and/or procedures.

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SUPERSEDES: P/I 9.2/4

APPLICABLE TO: All Metro Employees

INFORMATION PROTECTION AND CONFIDENTIALITY AGREEMENT

As an employee of the Washington Metropolitan Area Transit Authority ("Metro"), you have been or may be granted access to certain sensitive, private, non-public, confidential and/or proprietary information, including but not limited to Metro's and/or third parties' business or financial information (for example, intellectual property, business plans, or trade secrets); critical infrastructure information ("CI"); safety sensitive information ("SSI"); information protected from disclosure by applicable law or privilege; audit or investigatory records; human capital and/or payroll data or information; individuals' private information (for example, social security numbers, birthdates, or home addresses); and/or personnel, disciplinary, medical/health, law enforcement, and registered SmarTrip® records (individually and collectively, "Protected Information"). Protected Information may be in an oral, written, electronic, or computer-generated format.

By signing this agreement, I acknowledge that:

A. I have read and understand my obligations under Metro's data and information protection policies, which may be amended from time to time, including but not limited to the following Metro Policy/Instructions:

- P/I 6.1 Records Management Policy
- P/I 7.3.1 Personnel Records
- P/I 7.8.10 Code of Ethics
- P/I 9.2 Privacy Policy
- P/I 9.3 Public Access to Records Policy
- P/I 15.4 Network Infrastructure Policy
- P/I 15.18 Voice and Data Communication Policy
- P/I 15.22 Mobile Device Policy
- P/I 15.27 Incident Response and Reporting Management Policy
- P/I 15.28 Cybersecurity Policy

B. I recognize that in the performance of my duties and responsibilities, I must exercise the highest degree of care to protect, safeguard, and preserve the integrity and confidentiality of all Protected Information to which I have been granted access.

C. I understand that my access to Protected Information is granted solely for legitimate business purposes consistent with my job duties. If my job duties change such that I no longer require this access, I will discontinue use of such Protected Information and will work with my department leadership to ensure my access is appropriately limited and return any copies of such Protected Information to Metro.

D. I understand that during my employment or thereafter, I may not, directly or indirectly, divulge, discuss, transmit, copy, or otherwise distribute any Protected Information, and/or any other information or document that I have obtained as a result of my employment with Metro, except in accordance with applicable law and/or Metro Policy/Instructions.

E. I understand that failure to comply with these requirements will result in disciplinary action, up to and including termination.

Name

Signature

Dept/Office

Date

STATUS

DATE
APPROVED

CLASS

LEAD

DATE OF
LAST
REVIEW

PAGE

A P P R O V E D

7/10/2026

Legal

Legal &
Compliance

6/12/2026

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