STATE OF ALABAMA

OFFICE OF INFORMATION TECHNOLOGY

OIT Policy 340

Cloud-Based File Storage and Sharing Policy

POLICY NUMBER	OIT Policy 340-02
VERSION DATE	April 12, 2016
POLICY TITLE	Cloud-Based File Storage and Sharing Policy
OBJECTIVE	The State of Alabama Secretary of Information Technology mandates a Cloud-Based File Storage and Sharing policy to supplement the management, operational and technical security controls to ensure safeguards are in place to protect the Confidentiality and Integrity of Sensitive Data collected or maintained by the State of Alabama against loss, unauthorized access, or disclosure.
AUTHORITY	The authority of the Secretary of Information Technology to create and enforce policies relating to Information Technology is derived from the following legislation: *The Code of Alabama, Sections 41-28-1 through 41-28-8, (Act 2013-68)*
TERMS AND DEFINITIONS	The terms and definitions listed below will further clarify and explain the terminologies used in this policy. • Cloud-Based File Storage and Sharing Service – A commercial service in which a user is allotted storage space on a remote server where access to the server is carried out over a network, such as the Internet. • Electronic Device – Any electronic device that requires software for its operation, and has the capability to transfer, transmit, capture, receive, or store data. Examples include, but are not limited to: desktops, personal computers, laptops, notebooks, notepads, handhelds, and smart phones.

- File – Includes, but is not limited to, word processing documents, spreadsheets, e-mails, office productivity application, images of reports, screens, and all other forms of electronic data.

APPLICABILITY AND SCOPE

The requirements and responsibilities defined in this policy apply to all departments, agencies, offices, boards, commissions, bureaus, authorities, and individuals in the employment of the State (including contract staff).

This policy shall not apply to counties, municipalities, the Alabama State Port Authority, or institutions of higher education governed by a separate board of trustees, unless these entities or institutions enter into cooperative agreements and/or contracts related to Information Technology efforts with the State, in which case they will be bound by this policy and the standards implementing its application and enforcement.

STATEMENT OF POLICY

It is the policy of the Office of Information Technology (OIT) that the State of Alabama shall limit cloud-based file storage and sharing services to products that provide the following capabilities:

- Is licensed through a state contract vehicle;
- Licenses are managed and administered centrally by the State agency who manages their Active Directory;
- Enable users to synchronize their files for offline use across different electronic devices;
- Provide backup and recovery services; and
- Offer geographical restrictions (limited to continental United States) for storage.

Use of cloud-based file storage and sharing services that do not meet ALL of the above criteria are prohibited.

Additionally, any information subject to the following laws or guidelines are prohibited for storage in any cloud-based file storage and sharing service:

- Health Insurance Portability and Accountability Act (HIPAA)
- Protected Health Information (PHI)

- Personally Identifiable Information (PII)
- **Non-Publically Releasable** Criminal Justice Information (CJI)
- Federal Tax Information (FTI)
- Federal Educational Rights and Privacy Act (FERPA)
- Data protected by Code of Alabama, Alabama Administrative Code, or written agency policy.

Other limitations for use are as follows:

- Utilizing authorized cloud-base file storage and sharing services to sync files on personally owned or unmanaged electronic devices is prohibited.

- Utilizing authorized cloud-based file storage and sharing services for personal data, to include but not limited to; photos, texts, emails, recordings, notes, etc. is prohibited.

- Utilizing authorized cloud-based file storage and sharing services as a platform for application and/or web development or hosting, or as a vehicle to move home grown or commercial applications to a "cloud environment" is prohibited.

AGENCY RESPONSIBILITIES

Agencies that are not in compliance with this policy must migrate their current cloud-based file storage and sharing solution within the schedule established by OIT or within the renewal period of their current product. Agencies cannot renew, extend, or initiate agreements for non-compliant providers as of the effective date of this policy.

An agency may decide not to allow the use of any cloud-based file storage and sharing services for employees of the agency.

Supplemental policies, standards, procedures, and other governance documents relating to the agencies' cloud-based file storage and sharing plans must be submitted to OIT for review and approval.

IMPLEMENTATION AND ENFORCEMENT

The Office of Information Technology, under the authority of the Secretary of Information Technology, will promulgate policies, standards, procedures, and other documents governing the Security Planning Program for the State of Alabama.

SUPPORTING DOCUMENTS	The following documents support this policy: • Alabama OIT Cyber Security Policies (600 Series)
EFFECTIVE DATE	This Policy shall be effective upon its approval by the Secretary of Information Technology, as evidenced by the signature of the Secretary being affixed hereto.
SUPERSEDES	This is the initial policy and does not supersede a previous version.

The undersigned, as Acting Secretary of Information Technology of the State of Alabama, exercising the power vested in that Office by the laws of this State, declares this Policy to be adopted as of the 12 day of April, 2016.

Joanne E. Hale, PhD
Acting Secretary of Information Technology

DOCUMENT CHANGE HISTORY

Version	Release Date	Comments
340-01	3/30/16	Initial version
340-02	4/12/16	Clarified CJI Data, Corrected typo in footer