Procedure

[Full Name of Procedure]

Reference to Parent Policy:

[Full Name of Parent Policy]

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| Approval Date: | YYYY-MM-DD |

Table of Contents

[1. Overview and Purpose 2](#_Toc100605605)

[2. Scope 2](#_Toc100605606)

[3. Key Definitions 2](#_Toc100605607)

[4. Roles and Responsibilities 2](#_Toc100605608)

[5. Procedures 2](#_Toc100605609)

[5.1. Sub-Heading 1 3](#_Toc100605610)

[5.2. Sub-Heading 2 3](#_Toc100605611)

[5.3. Sub-heading 3 3](#_Toc100605612)

[6. Permissions and Tools 3](#_Toc100605613)

[7. Procedure Approval Requirements 3](#_Toc100605614)

[8. Enforcement and Exceptions 3](#_Toc100605615)

[9. Document Control 4](#_Toc100605616)

# Overview and Purpose

This section is a high-level statement of the overview and purpose of the Procedure. It should provide a reference to a corresponding Policy. This section is mandatory.

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| ***Example 1:***  *The purpose of this Procedure is to limit the risk of loss to PayPal information resources through information classification management.*  ***Example 2:***  *This Procedure governs the activities of BRM Operations teammates in reviewing accounts and/or websites that may be associated with transactions involving the sale of personal information.* |

# Scope

This section lists all to whom this Procedure applies. This section is mandatory.

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| ***Example 1:***  *This Procedure applies to all PayPal personnel and personnel affiliated with vendors or third parties, including non-PayPal personnel, who access, manage, update, store, process or otherwise handle PayPal information resources. This Procedure also applies to all information resources and equipment owned, operated or leased by or on behalf of PayPal.*  ***Example 2:***  *This Procedure applies to all Functional Areas within PayPal, its subsidiaries and markets, and third parties acting on the Company’s behalf.* |

# Key Definitions

This section includes any specific definitions that need to be defined in this Procedure.

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| ***Examples:***  ***Issue:*** *A breakdown or lack of a Control that requires remediation to prevent or reduce recurrence.*  ***Quality of Risk Management (QRM):*** *Assessment of the strength of the Control Environment designed to mitigate Inherent Risk.* |

# Roles and Responsibilities

This section identifies who is responsible for performing which aspects of this Procedure.

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| ***Examples:***  ***Head of Records and Information Governance Program***  *Head of Records and Information Governance Program (“RIG”), is responsible for supporting, overseeing, and ensuring sustainability of the RIG Program.*  ***Risk and Compliance Officers (“Risk and Compliance Officers” or “RCO”)***  ***RCOs*** *act as a point of contact for Functional Areas to provide expertise on Risk and compliance Management-related matters and are also responsible for overseeing the Functional Areas in meeting RIG policies and procedures.*  ***Internal Control******Partners (“ICP”)***  *ICPs within each Functional Area, are responsible for communicating, implementing, and overseeing adherence to the respective RIG policies and procedures in each Functional Area.* |

# Procedures

This section is the main body and the actual content of the Procedure. This is where the step-by-step instructions, which detail how to adhere to a corresponding Policy, are captured.

This section may include several sub-headings depending on the complexity of the Procedure matter. This section is mandatory.

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| ***Example 1:***   1. ***Procedures***    1. ***Key Principles***    2. ***Systems Requirements*** |

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| ***Example 2:***   1. ***Procedures***    1. ***Initial Planning***    2. ***Third Party Management Team Review*** |

## Sub-Heading 1

Sub-heading 1 content

## Sub-Heading 2

Sub-heading 2 content

## Sub-heading 3

Sub-heading 3 content

# Permissions and Tools

This section Identifies tools (and associated permissions required) referenced in the Procedure. This section is optional and should be included only if applicable.

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| ***Examples:***   * *Microsoft Excel* * *Kleopatra file encryption software* * *HyperOffice* * *Search tools to use for a manual sanctioned entity search for and verify missing Negative table entries.* |

# Procedure Approval Requirements

This section should include information on who maintains the Procedure, and how the approval and renewal of this Procedure is carried out. This section is mandatory.

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| ***Example 1:***  *This Procedure is maintained by [owner title], or his/her designee(s), and approved by [approver title]. This Procedure will be reviewed and approved at least once every 18 months from the most recent approval date. Non-material changes to this Procedure required outside of this cycle may be approved by [owner title] or his/her designee.* |

# Enforcement and Exceptions

This section indicates who is responsible for complying with the Procedure and the process for requesting exceptions to the Procedure.

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| ***Example 1:***  *All employees and agents of PYPL are responsible for complying with this Procedure. Functional Area Management, in collaboration with the RCOs and ICPs, are responsible for ensuring adherence to this Procedure within their respective organizations and for taking appropriate action for Functional Areas which do not comply with this Procedure. Each Functional Area shall periodically attest to their adherence to this Procedure. Proposed exceptions to this Procedure will be evaluated on a case-by-case basis. Exception requests should be documented and presented to the CRCSO, or his/her designee(s), for approval.* |

# Document Control

This sub-section lists all previous versions of the Procedure and should provide complete information on all changes made to the Procedure since its creation. This sub-section is mandatory.

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| Version | Change Summary | Owner | Policy Contact | Exception Reviewer | Approver | Approval Date |
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