

Cottonwood, Inc.
Policies and Procedures

SECTION: Information Technology

POLICY NO: 07-002

SUBJECT: Cybersecurity Awareness Training

EFFECTIVE DATE: April 2023

Policy:

Cottonwood, Inc. has a responsibility to comply with federal and state laws & regulations related to information security. The purpose of this policy is to educate users on this responsibility ensuring appropriate confidentiality and integrity of Cottonwood, Inc.'s information assets.

The Information Technology department shall implement regular cybersecurity training opportunities, administer ongoing phishing test campaigns, and provide regular informational materials in the staff bulletin.

Procedures:

1. New users shall have 90 days to complete the initial cybersecurity training videos. This training shall focus on Security Awareness Foundations and how to properly report phishing scams using the Phish Alert Button.
2. All users will be required to complete an annual cybersecurity awareness training. Trainings will include topics covering the following topics:
 - A. Acceptable use of information technology
 - B. Relevant state/federal policies and risks to information systems
 - C. General cybersecurity topics (e.g., virus, malware, phishing, social engineering, or other relevant vulnerabilities)
3. The IT Manager, in coordination with the Technology Steering Committee, shall determine appropriate training opportunities based on current emerging threats and known security incidents. Training modules shall be administered through the **KnowBe4** web-based learning platform.
4. Regular phishing test campaigns shall be implemented throughout the year to help promote ongoing education and identify individual users who may require additional training or intervention.
5. The IT Department shall include a cybersecurity component in addition to other IT related topics as part of the Cottonwood, Inc. Staff bulletin.