**Global Data Governance Policy**

**DC-DG-01**

**Purpose/Overview**

This Global Data Governance Policy provides the foundation for effective and compliant data governance at Walmart by defining the roles and responsibilities that establish and carry out the requirements for effective management of Walmart Data. Compliance with this Policy allows the company to make data-driven decisions, improve business performance, and enhance product and service offerings for Walmart’s retail and business customers.

**Definitions**

**Business Data Owner** is defined in section 1.1.B of “Roles and Responsibilities” below.

**Business Data SME** is defined in section 1.1.D of “Roles and Responsibilities” below.

**Business Data Steward** is defined in section 1.1.C of “Roles and Responsibilities” below.

**Business Unit** is a group of Walmart associates and any third parties responsible for performing a business function, such as Finance, H.R, or Walmart+.

**Structured Walmart Data** is Walmart Data that is contained in a database or other formatted repository that organizes information for effective processing and analysis. Structured Walmart Data excludes all “unstructured data” such as photographs, Word documents, text messages, and audio files.

**Technical Data Steward** is defined in section 1.1.E of “Roles and Responsibilities” below.

**Walmart Data** includes all types of data, in any format, owned, controlled, gathered, or processed by or on behalf of Walmart, such data stored or processed in infrastructure environments and all datasets, new and existing.

**Target Audience**

This policy applies to all Walmart associates who define, create, receive, transfer, process, or store Structured Walmart Data. “Walmart” means Walmart Inc., its subsidiaries, and any operating units in which Walmart Inc. has a majority or controlling interest. Any violation of this Policy may result in disciplinary action up to and including termination and may be referred to the appropriate law enforcement authorities when applicable.

Walmart expects its suppliers, vendors, service providers, and other third parties to uphold our digital trust commitments. The [Walmart Standards for Suppliers](https://corporate.walmart.com/suppliers/requirements) as well as Walmart legal agreements include specific requirements for third parties.

**Detailed Requirements**

**1.1**  **Roles and Responsibilities**

1. Digital Citizenship
2. Digital Citizenship creates and maintains all data policies, including associated standards and procedures.
3. Digital Citizenship monitors against policy requirements.
4. Digital Citizenship collaborates with business and technology stakeholders to ensure Business Units understand their responsibilities for compliance with this Policy.
5. Digital Citizenship collaborates with business and technology stakeholders to develop data governance training for all Walmart home office associates.
6. Digital Citizenship supports risk assessments related to business data activities.
7. Business Data Owner
8. A Business Data Owner is accountable for the business vision and strategy for data use within its Business Unit.
9. A Business Data Owner is accountable for ensuring compliance with data governance policies within its Business Unit, in coordination with Business Data Stewards and Technical Data Stewards.
10. The Business Data Owner function is typically fulfilled by an officer within a Business Unit.
11. Business Data Steward
12. A Business Data Steward is responsible for executing the business vision and strategy for data use within its Business Unit.
13. A Business Data Steward is accountable, within its Business Unit, for the implementation, maintenance, and monitoring of Structured Walmart Data in accordance with Walmart data governance policies and standards and market-level laws and regulations.
14. The Business Data Steward function is typically fulfilled by Product Owners, Data Analysts, or associates designated as Data Stewards.
15. Business Data Subject Matter Expert (SME)
    1. A Business Data SME is responsible for supporting business processes and business operations in coordination with the Business Owner and Data Steward.
    2. The Business Data SME function must be held by a manager, or its equivalent, or a manager’s direct report within Global Tech.
16. Technical Data Steward
    1. A Technical Data Steward is responsible for working to ensure that the technology used by Walmart is in alignment with business vision as well as the policies, standards, and processes of Digital Citizenship and Global Tech.
    2. The Technical Data Steward function is typically filled by Global Tech associates who are Technology Data Architects or Data Modelers, Data Engineering Leads, and designated Data Custodians (*See* Identity, Authentication, and Access Controls Policy [GTPG-18-P](https://teams.wal-mart.com/sites/polstdgov/Standards/GTPG%20Publications/GTPG-18-P.pdf?CT=1637689810326&OR=ItemsView)).
17. Global Tech Associates

1. With input from Digital Citizenship, Global Tech associates are responsible for the development and deployment of tools and technology solutions to execute governance and enable monitoring.

1. **1.2**  **Business Requirements**
2. To implement data governance across its organization, each Business Unit must identify and assign at minimum one Business Data Owner and Business Data Steward.
3. For data classified as Highly Sensitive, the Business Unit must assign a Business Data Owner and a Business Data Steward, as well as an alternate for each role to mitigate the risk of associate turnover.

**1.3**  **Markets**

1. Local markets are responsible for execution and implementation of the requirements and controls set forth in data governance policies and standards.
2. Where a local market’s laws, regulations, or customs require stricter controls than those set forth in the global policies, the markets may establish market-specific data governance processes. If markets set different requirements, they must at least meet the requirements set in this Policy. A market must obtain an approved exception prior to implementing controls that are less stringent than required by policy or standard.

**Contact Information**

For assistance, contact Data Governance at GlobalDataGovernance@walmart.com

**Resources**

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| Policies: | [Global Data Classification Policy (DC-DG-03)](https://one.walmart.com/content/uswire/en_us/work1/policies/non-people-policies/data-governance/data-classification-policy--dg-03/data-classification-policy--dc-dg-03-.html)  [Global Data Sharing Policy (DC-DG-04)](https://one.walmart.com/content/uswire/en_us/work1/policies/non-people-policies/data-governance/data-sharing-policy---dg-04/data-sharing-policy--dc-dg-04-.html)  [Global Data Product Policy (DC-DG-05)](https://one.walmart.com/content/uswire/en_us/work1/policies/non-people-policies/data-governance/data-product-policy--dg-05/data-product-policy--dc-dg-05-.html)  [Code of Conduct](https://www.walmartethics.com/content/walmartethics/en_us/code-of-conduct.html)  [Walmart Global Records and Information Management Policy (DC-DG-09](https://one.walmart.com/content/uswire/en_us/work1/policies/non-people-policies/privacy-and-records/walmart-global-records-and-information-management-policy--dc-dg-/records-management.html))  [Identity, Authentication and Access Control (GTPG-18-P)](https://one.walmart.com/content/uswire/en_us/work1/technology/global-tech/tech-policy-digital-library/18-policy-group/18_policy.html)  *Applicable Market Privacy and Records Management Policy* |
| Standards: | [Data Access Standard](https://one.walmart.com/content/uswire/en_us/work1/global-governance/digital-citizenship/data-policies/data_governance/dg-standards/dg-01-st-01.html)  [Global Data De-Identification Standard](https://one.walmart.com/content/uswire/en_us/work1/global-governance/digital-citizenship/data-policies/data_governance/dg-standards/dg-01-st-02.html)  [Data Quality Standard](https://one.walmart.com/content/uswire/en_us/work1/global-governance/digital-citizenship/data-policies/data_governance/dg-standards/dg-01-st-03.html)  [Metadata Standard](https://one.walmart.com/content/uswire/en_us/work1/global-governance/digital-citizenship/data-policies/data_governance/dg-standards/dg-01-st-04.html)  [Global Roles and Responsibilities Standard](https://one.walmart.com/content/uswire/en_us/work1/global-governance/digital-citizenship/data-policies/data_governance/dg-standards/dg-02-st-01.html)  [Data Sharing Standard](https://one.walmart.com/content/uswire/en_us/work1/global-governance/digital-citizenship/data-policies/data_governance/dg-standards/dg-04-st-01.html) |
| Process: | [Know Your Data Process](https://one.walmart.com/content/uswire/en_us/work1/global-governance/digital-citizenship/data-policies/data_governance/dg-procedures/dg-pr-01.html)  [Data Retention and Disposal Process](https://one.walmart.com/content/uswire/en_us/work1/global-governance/digital-citizenship/data-policies/data_governance/dg-procedures/dg-01-pr-02-html.html)  [Data Product Process](https://one.walmart.com/content/uswire/en_us/work1/global-governance/digital-citizenship/data-policies/data_governance/dg-procedures/dg_05_pr_01.html) |