



Easter Seals Goodwill Industries Rehabilitation Center, Inc.

**Privacy Protection Policy to Ensure Confidentiality of Social Security Numbers**

**IT IS THE POLICY OF EASTER SEALS GOODWILL INDUSTRIES REHABILITATION CENTER, INC. TO SAFEGUARD FROM MISUSE BY THIRD PARTIES ANY PERSONAL INFORMATION THAT CAN BE ASSOCIATED WITH AN INDIVIDUAL AND THAT IS GATHERED IN THE COURSE OF DOING BUSINESS. SUCH PERSONAL INFORMATION SHALL INCLUDE, BUT NOT BE LIMITED TO, SOCIAL SECURITY NUMBER, DRIVER'S LICENSE NUMBER, HEALTH INSURANCE IDENTIFICATION NUMBER, CREDIT CARD NUMBER AND GENERALLY OTHER INFORMATION USED TO COMPLETE FORM I-9, EMPLOYMENT ELIGIBILITY VERIFICATION. PROCEDURES HAVE BEEN DEVELOPED TO LIMIT ACCESS TO PERSONAL INFORMATION TO THOSE WITH A NEED-TO-KNOW FOR BUSINESS PURPOSES ONLY AND TO SAFEGUARD THE DOCUMENTS AND THE COMPUTER FILES AND DATA THAT CONTAIN THE INFORMATION. SUCH INFORMATION, BEFORE DISPOSAL, SHALL BE DESTROYED, ERASED, SHREDDED, OR OTHERWISE MADE UNREADABLE WHETHER IN A DOCUMENT, COMPUTER FILE OR GENERAL DATA. ANY KNOWN VIOLATION OF THE POLICY, WHETHER INTENTIONAL OR NOT, MUST BE IMMEDIATELY BROUGHT TO THE ATTENTION OF THE VICE PRESIDENT OF HUMAN RESOURCES OR APPROPRIATE ADMINISTRATIVE STAFF MEMBER FOR NECESSARY CORRECTIVE ACTION.**

In the course of doing business, Easter Seals Goodwill Industries collects personal information from prospective employees, active employees, program participants and customers or donors. Affirmative steps have been taken to safeguard documents, computer files and data that contain personal information from misuse by third parties. Adequate safeguards have been implemented and will be enforced when such documents, computer files or data must be transmitted in any form. Additionally, procedures have been established related to collection of such data, use of such data and destruction or disposal of such data.

All employees, board members, volunteers and other professional affiliates of the Agency are expected to adhere to the following procedures:

- Collection and use of personal information such as a Social Security number will be limited to the fulfillment of legal and other requirements in which personal information is essential (i.e. Employment Application, I-9 Form, payroll, retirement plan, background checks, insurance enrollment, and other situations that require individual identification).

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- Access to personal information such as a Social Security number will be limited to those parties within and outside of the organization with a need-to-know for business purposes only.
- Distribution of personal information such as a Social Security number will be performed in a manner to protect the security and confidentiality of such information. Information will be delivered in person, when practical to do so. At such times that information cannot be delivered directly and in-person to the intended recipient, any document, form or data containing personal information will be secured in an envelope or other closed container and sent directly to the intended recipient. All information containing personal information that must be faxed or sent via email, whether it is being sent within the organization or to an outside party, will be sent directly to the attention of the intended recipient and shall include a confidentiality notice. Emails containing SSNs and other personal protected information MUST be encrypted in accordance with the Agency Email Encryption Policy. Electronic transmittal of information containing a SSN or other personal protected information without encryption is strictly prohibited.
- Storage of any document, form or data maintained by the Agency that contains personal information such as a Social Security number will be maintained in a locked storage container such as a file cabinet. Access to such information will be limited to those with a need-to-know for business purposes only.
- Before disposal, documents, forms or data containing personal information such as a Social Security number, shall be destroyed, erased, shredded, or otherwise made unreadable whether in a document, computer file or general data. Generally, documents containing personal information are stored in a secured area until a sufficient amount is gathered to engage a vendor to shred the documents. A small paper shredder is also maintained on Agency premises for day-to-day shredding of documents containing personal information. Under no circumstances should any document, form or data containing personal information be disposed of in any manner unless the personal information is made unreadable.

Any Agency employee who fails to adhere to the procedures stated above will be subject to disciplinary action up to and including termination of employment. Any board member, volunteer or other professional affiliate of the Agency who does not reasonably safeguard personal information such as a Social Security number provided by the Agency may be subject to cessation of the professional relationship. Any person or entity that violates this policy and related procedures through intentional misuse of personal information related to any employee or program participant of the Agency shall be subject to a civil penalty.

**Approved by Board of Directors, September 18, 2008**

**2014 Review by Attorneys at Murtha Cullina, LLP**

Review 4/2012; 5/2015

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