

SOCIAL SECURITY NUMBER & PRIVACY PROTECTION POLICY

I. POLICY

Community Action Agency of New Haven, Incorporated, (“CAANH”) its subsidiaries and designated affiliates are committed to maintaining the confidentiality of Social Security numbers and personal information that it collects during the regular course of business. Accordingly, CAANH has established this policy to restrict access, disclosure, use and disposal of Social Security numbers and personal information that have been collected by the CAANH and its employees. The purpose of this policy is to comply with Federal, state and local law protecting the confidentiality of Social Security numbers and personal information, including but not limited to Connecticut Public Act No. 08-167, effective October 1, 2008.

II. PROCEDURES TO PROTECT THE CONFIDENTIALITY OF SOCIAL SECURITY NUMBERS AND PERSONAL INFORMATION

Authorized Collection And Access To Social Security Numbers and Personal Information

The Community Action Agency of New Haven collects the Social Security numbers and personal information of employees, client applicants, independent contractors, interns, temps, and other individuals only for legitimate business reasons. Examples of such reasons may include:

- The intake and handling of client information in connection with operating its social service programs;
- Background checks for applicants for employment;
- Determining eligibility for employment;
- Enrollment in employee benefits programs;
- Reporting that is required by law, such as for tax purposes.

CAANH restricts access to the Social Security numbers and personal information that it collects only to CAANH employees and certain third parties who are authorized to access this information. Authorized

employees are those whom CAANH has determined to have a legitimate business need to access this information. Authorized third parties are those who have a legitimate need to access this information and owe a duty to maintain its confidentiality (e.g . . . insurance providers and vendors who are provided Social Security numbers and personal information to run background checks).

Disclosure And Use Of Social Security Numbers and Personal Information

The CAANH prohibits the disclosure and use of Social Security numbers and personal information unless such disclosure and use complies with this policy and with Federal, state and local law. Social Security numbers and personal information shall not be displayed on identification cards or badges, bulletin boards, or any similar materials that are publicly displayed. Documents, materials or computer screens that display Social Security numbers and personal information shall be shown only to authorized employees and third parties and shall be kept out of public view at all times. Social Security numbers and personal information may only be used by authorized CAANH employees for legitimate business reasons, including but not limited to those reasons described above.

Storage And Disposal Of Personal Information Including Social Security Numbers

The CAANH shall take reasonable steps so that all documents and files (both electronic and in hard copy) that contain personal information such as Social Security numbers shall be stored in a physically secure manner. "Personal information" is defined under the law as information capable of being associated with a particular individual through one or more identifiers. Examples of personal information include a person's Social Security number, driver's license number, passport number, credit or debit card numbers and health insurance identification numbers. The CAANH requires that personal information be stored in a way that prevents unauthorized access. For example, hard copy documents that contain personal information

should be stored in files that can only be accessed by authorized CAANH employees or third parties, and computers or other electronic devices that contain personal information should be secured against unauthorized access, such as through the use of a password. The CAANH requires that any authorized personnel who maintains personal information must take appropriate steps consistent with this policy to safeguard such information. Documents or other materials (both electronic and in hard copy) that contain personal information shall be disposed of in a manner such that the personal information is erased or made unreadable at the time of disposal. It may be necessary to consult with the Community Action Agency of New Haven's IT department to ensure proper disposal of personal information that is stored electronically.

III. NON-COMPLIANCE WITH THIS POLICY AND THE LAW

Failure to comply with this policy may result in disciplinary action up to and including termination. Furthermore, the law provides civil and criminal penalties for individuals who violate laws protecting the confidentiality of Social Security numbers and personal information. If you have any questions about this policy, including about how to dispose of personal information, please contact your supervisor for assistance with protecting or deleting electronic documents, or Human Resources.

Connecticut Public Act 08-167
Privacy Protection Policy.CT.08