

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Kathleen Swantek	DATE SUBMITTED: 08/11/08	SECTION: Human Resource	
BOARD APPROVED ON: 08/11/08	DATE REVISED: 7/18/17	SUBJECT: Sensitive and Non Public Information	
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 03/21/18, 7/15/2020, 7/15/2022, 10/11/2023		POLICY #: ED-033	PAGE #: 1 of 4

I. APPLICATION

The provisions stated herein shall apply to employees, contractors, consultants, temporary workers, and other workers at Blue Water Developmental Housing, Inc. (BWDH), including all personnel affiliated with third parties.

II. POLICY

It is the policy of Blue Water Developmental Housing to adopt this policy to help protect employees, individuals supported, contractors and the organization from damages related to loss or misuse of sensitive information. This policy will:

- Define sensitive information
- Describe the physical security of data when it is printed on paper
- Describe the electronic security of data when stored and distributed

III. DEFINITIONS

Sensitive Information: includes the following items whether stored in electronic or printed format:

- a. Personal Information – sensitive information consists of personal information including, but not limited to:

Credit card information, including any of the following:

- Credit Card Number (in part or whole)
- Credit Card Expiration Date
- Cardholder Name
- Cardholder Address

- b. Tax Identification Numbers, including:

- Social Security Numbers
- Social Insurance Numbers
- Business Identification Number
- Employer Identification Numbers

- c. Payroll information, including, among other information:

- Paychecks

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- Pay Stubs
 - Pay rates
- d. Cafeteria Plan Check Requests and associated paperwork
- e. Medical Information for any employees or individuals supported, including but not limited to:
- Doctor names and claims
 - Insurance Claims
 - Prescriptions
 - Any related personal medical information
- f. Other Personal Information belonging to individuals supported, employees and contractors, examples of which include:
- Date of birth
 - Address
 - Phone numbers
 - Maiden name
 - Names
 - Customer Number
- g. Organization Information – Sensitive corporate information includes, but is not limited to:
- Organization, employee, individuals supported, vendor, supplier confidential, proprietary information or trade secrets
 - Proprietary and/or confidential information, among other things, includes: business methods, customer utilization information, retention information, sales information, marketing and other organization strategy, computer codes, screens, forms, information about, or received from, organization’s current, former and prospective individuals supported, sales associates or suppliers or any other non-public information. Proprietary and/or confidential information also includes the name and identity of any customer or vendor and the specifics of any relationship between and among them and the organization.

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- h. Any document marked “Confidential,” “Sensitive”, “Proprietary”, or any document similarly labeled.
- i. The organization personnel are encouraged to use common sense judgment in securing the organization confidential information to the proper extent. If an employee is uncertain of the sensitivity of a particular piece of information, he/she should contact their supervisor/manager.

Hard Copy Distribution: every employee and contractor performing work for the organization will comply with the following policies:

- a. File cabinets, desk drawers, overhead cabinets, and any other storage space containing documents with sensitive information will be locked when not in use.
- b. Storage rooms containing documents with sensitive information and record retention areas will be locked at the end of each workday.
- c. Desks, workstations, work areas, printers and fax machines, and common shared work areas will be cleared of all documents containing sensitive information when not in use.
- d. Whiteboards, dry-erase boards, writing tablets, etc. in common shared work areas will be erased, removed, or shredded when not in use.

Electronic Distribution: every employee and contractor performing work for the organization will comply with the following policies:

- a. Internally, sensitive information may be transmitted using approved organization e-mail. All sensitive information must be encrypted (when available) when stored in an electronic format.
- b. Any sensitive information sent external must be encrypted (when available) and password protected and only to approved recipients. Additionally, a statement such as this should be included in the email.

“This message may contain confidential and/or proprietary information, and is intended for the person/entity to whom it was originally addressed. Any use by others is strictly prohibited.”

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- c. No employee/individual supported files may leave organization premises or be stored in a personal electronic device without approval from management.

Encryption: the translation of data into a secret code. Encryption is the most effective way to achieve data security. To read an encrypted file, you must have access to a secret key or password that enables you to decrypt it. Unencrypted data is called plain text.

Hard Copy: a printout of data stored in a computer. It is considered *hard* because it exists physically on paper, whereas a *soft* copy exists only electronically.

III. NOTIFICATION/PROCEDURE

Management will have the responsibility to enforce this policy and ensure that it is followed by employees and contractors.

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.