

701a Privacy Protection Policy

Effective Date: 10/1/08

Morris Foundation, Inc. (“The Company”) is committed to insuring the privacy of third parties, including employees. In the ordinary course of its business and for a variety of legitimate business reasons, Morris Foundation may collect and store the social security numbers and personal information of its employees, job applicants, and clients/customers in hard copy or digital form. Personal information includes an individual’s social security number, driver’s license number, state identification card number, credit or debit card number, a passport number, an alien registration number or a health insurance identification number (“Personal Information”).

Morris Foundation takes measures to prevent the unauthorized disclosure of all Personal Information in its possession, including without limitation:

- Ensuring the confidentiality of Personal Information ;
- Prohibiting unlawful or unauthorized disclosure of Personal Information ;
- Limiting the number of employees with access to Personal Information
- Ensuring the proper disposal of documents (hard copy or digital) that contains Personal Information ;
- Restricting the circumstances where employees have access to Personal Information ; and
- Disciplining any employee who violates the privacy protection policy.

Morris Foundation and every one of its employees with access to social security numbers, will maintain the security and confidentiality of every document containing social security numbers. This means, at a minimum, that the Company’s Human Resources Department will maintain all employee files under lock, and that any access to digital files containing all or any part of a person’s social security number will be password protected.

Furthermore, except as otherwise permitted by the Morris Foundation in writing, no Company employee shall display or disclose a person’s social security number without the express written consent of that individual or Director of Human Resources. The Company will not mail any document containing a person’s social security number that is visible on, or from, the outside of the mailed article. Nor will the Company use social security numbers as a general identifying number for its employees or job applicants, or visibly print it on identification tags, badges, passes, cards, or licenses. Morris Foundation will not require any person to use or transmit their social security number over the Internet, or any Company intranet, computer system, or network unless the connection is secure or the transmission is encrypted.

Morris Foundation restricts access to any document displaying a person’s social security number to those: with a legitimate business need to access those documents; who are acting consistent with Company policy; and in accordance with their assigned job tasks. Access to these documents by *anyone other than those authorized* under Company policy must be specifically authorized, in writing, by the Director of Quality & Administrative Outpatient Services or by the person to whom the social security number is assigned. Documents containing a person’s social security number will be disposed of in accordance with the Company’s document retention policy and procedures.

Nothing in this policy is intended to modify an employee's right to access their own personnel file, as permitted by Morris Foundation policies and Connecticut law. Nor does this policy prohibit the use of an employee's Personal Information where the use is authorized by state or federal statute, rule, regulation, court order, or pursuant to legal discovery or process.

Violations of this policy will result in disciplinary action up to and including termination of employment. Violators may also be subject to civil and criminal penalties authorized by applicable state or federal law.