



CAMBRIDGE
PROPERTY & CASUALTY

SOCIAL SECURITY NUMBER PRIVACY POLICY SAMPLE

I. POLICY:

A. Company recognizes that social security numbers have important consequences and can be used for improper purposes such as identity theft. As a result, all employees, contractors, students, volunteers or anyone else performing work on behalf of the Company are obligated to maintain the privacy of all social security numbers (SSN) that the Company possesses or obtains, whether the SSN is of an applicant, a current employee, or anyone else per the requirements of the Michigan Social Security Privacy Act.

B. Prohibited Activity:

The Company or its representatives shall not:

- Publicly display all or more than 4 sequential digits of the SSN.
- Use all or more than 4 sequential digits of the SSN as the primary account number for an employee.
- Visibly print all or more than 4 sequential digits of the SSN on any ID, badge or card, membership card, or permit or license.
- Require an individual to use or transmit all or more than 4 sequential digits of his or her SSN over the internet or a computer system or network unless the connection is secure or the transmission is encrypted.
- Require an individual to use or transmit all or more than 4 sequential digits of his or her SSN to gain access to an internet website or a computer system or network unless the connection is secure, the transmission is encrypted, or a password or other unique personal ID number or other authentication device is also required to gain access. Employees are prohibited from utilizing their SSNs as passwords for access to computer systems.
- Include all or more than 4 sequential digits of the SSN in or on any document or information mailed or otherwise sent to an individual if it is visible on or, without manipulation, from outside of the envelope or packaging.
- Include all or more than 4 sequential digits of the SSN in any document mailed to a person.

C. The Company is allowed to use all or more than 4 sequential digits of a SSN in the ordinary course of business to verify an individual's identity; to investigate an individual's claim,

credit, criminal, or driving record; to provide or administer employee health insurance or membership benefits, claims, or retirement programs. The Company will avoid providing SSN's to third parties unless required by law or reasonably necessary for a legitimate business purpose. In the case where the Company provides security numbers to any third party, it will make the third party aware of this privacy policy. The Company will, where possible, only communicate the last four digits of the SSN.

- D. The Company will internally strictly limit access to SSN's. Information or documents containing the SSN shall only be accessible to those with a need to know such as individuals who must use or access this information as a requirement of their job duties. Social security numbers on job applications or other employment documents will be kept in personnel files of employees which are maintained in a locked cabinet with limited access by human resources professionals. Medical records of employees that contain social security numbers will be maintained in a separate file with limited access by human resource professionals.
- E. The method of disposal for paper documents containing SSN's shall be the shredding of the documents by those individuals authorized to access such information as a requirement of their job duties. The method of disposal for computer disks and electronic medium containing SSN's shall be smashing or wiping of the computer disks.
- F. The Company will strictly enforce this policy and take stern action, up to and including termination, against any employee that violates this policy.