

## Data Security Policy and Procedures

Berkeley Policy Associates Data Security Policy and Procedures follows:

BPA require all its employees and contractors to adhere to the company's data security policy and procedures. Separate guidelines are established for a different class of information. The overview of these guidelines are summarized below.

### Definitions

**Class 1: Confidential** -- Anything that includes individual-identifying information such as names, SSN, dob, addresses, etc. These may include client and participant data as well as our personnel information.

**Class 2: Business critical/Proprietary** -- Any proprietary data and documents that are not Class 1. These may include program-level survey data, BPA's salary & sales info, and study notes and participant data without individual-identifying information.

**Class 3: Not confidential.**

### Policies for Class 1 Data

- (1) Can never leave BPA premises.
- (2) Always kept in a secure place.
- (3) Only authorized persons can access and use.
- (4) Must be properly disposed of or transferred.

### Procedures for Handling Class 1 Data

	Electronic Data	Paper Data
Receipt and tracking of Class 1 materials	<ul style="list-style-type: none"> <li>▪ Notify office manager if expecting to receive confidential data</li> <li>▪ Catalogue all data received</li> </ul>	<ul style="list-style-type: none"> <li>▪ Catalogue all data received</li> <li>▪ Notify Office Manager if expecting to receive confidential data</li> </ul>
Can never leave BPA premises	<ul style="list-style-type: none"> <li>▪ Must work on BPA premises with these data (working from home/during business trip is not permitted)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Must work on site with these data</li> </ul>
Create separate working analysis file	<ul style="list-style-type: none"> <li>▪ Strip individual-identifying information for analysis files, which can then be stored in access-limited folders on BPA's LAN</li> </ul>	
Always kept in a secure place	<ul style="list-style-type: none"> <li>▪ On data server or in locked cabinet in locked server room (CD or other disk media)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Locked cabinet in a locked room</li> <li>▪ Must not be left in public view (on desk or in common-use</li> </ul>

	Electronic Data	Paper Data
	<ul style="list-style-type: none"> <li>▪ Must not be left unattended in public view (e.g. on desk or screen)</li> <li>▪ May not be stored on laptop</li> </ul>	<p>areas)</p>
Only authorized persons can access and use	<ul style="list-style-type: none"> <li>▪ Limit access to the data server by use of passwords</li> <li>▪ The minimum number of people who absolutely need to use the data should be given access</li> </ul>	<ul style="list-style-type: none"> <li>▪ Key to locked cabinet to be kept securely by authorized persons</li> <li>▪ The minimum number of people who absolutely need to use the data should be given access</li> </ul>
Must be properly disposed of or transferred	<ul style="list-style-type: none"> <li>▪ Update catalogue whenever data are disposed of or transferred</li> <li>▪ Mail data in a password protected and/or encrypted form on an unmarked diskette and CD</li> <li>▪ Require recipient and delivery verification.</li> <li>▪ If absolutely necessary to transfer via email or internet, create encrypted, password-protected files; transmit password verbally (by phone). Do not include password in email!</li> </ul>	<ul style="list-style-type: none"> <li>▪ Update catalogue whenever data are disposed of or transferred</li> <li>▪ When mailing, require recipient and delivery verification.</li> <li>▪ Shred any paper with confidential data before disposing</li> </ul>

**Policies for Class 2:**

- (1) Only authorized persons can access and use.
- (2) Must be used and stored under responsible person's oversight. Must not be left in public view (e.g. sitting out on a desk, open on computer monitor).