

Data Security Policy

We protect the personally identifiable information that you provide to us to perform our services. Access to this information is restricted to those employees who need to know that information as part of their job. We maintain physical, electronic and procedural safeguards that are reasonably designed to guard nonpublic personal information. This document defines the data security policy of 4506-Transcripts.com. 4506-Transcripts.com takes the privacy of our employees and clients very seriously. To ensure that we are protecting our corporate and client data from security breaches, this policy must be followed and will be enforced to the fullest extent.

Intent

The goal of this policy is to inform employees at 4506-Transcripts.com of the rules and procedures relating to data security compliance.

The data covered by this policy includes, but is not limited to all electronic information found in e-mail, databases, applications and other media; paper information, such as hard copies of electronic data, employee files, internal memos, and so on.

Audience

This policy applies to all employees, management, contractors, vendors, consumers, business partners and any other parties who have access to company data.

Data Types

4506-Transcripts.com deals with two main kinds of data:

- 1. **Company-owned data** that relates to such areas as corporate financials, employment records, payroll, etc.
- 2. **Private data** that is the property of our clients and/or employees, such as social security numbers, credit card information, contact information, etc.

Data Classifications

4506-Transcripts.com data is comprised of 3 classifications of information:

- Public/Unclassified. This is defined as information that is generally available to anyone within or
 outside of the company. Access to this data is unrestricted, may already be available and can be
 distributed as needed. Public/unclassified data includes, but is not limited to, marketing materials,
 annual reports, and corporate financials.
 - Employees may send or communicate a public/unclassified piece of data with anyone inside or outside of the company.
- Private. This is defined as corporate information that is to be kept within the company. Access to
 this data may be limited to specific departments and cannot be distributed outside of the
 workplace. Private data includes, but is not limited to, work phone directories, organizational
 charts, and company policies.

All information not otherwise classified will be assumed to be Private.

Employees may not disclose private data to anyone who is not a current employee of the company.

Page 1



3. Confidential. This is defined as personal or corporate information that may be considered potentially damaging if released and is only accessible to specific groups [e.g. payroll, HR, etc]. Confidential data includes, but is not limited to, social security numbers, contact information, tax forms, accounting data, and security procedures. 4506-Transcripts.com considers it a top priority to protect the privacy of our clients and employees. A separate privacy policy Privacy Policy outlines our commitment to protecting personal data.

Employees may only share confidential data within the department or named distribution list.

4. Secret/Restricted. This is defined as sensitive data which, if leaked, would be harmful to 4506– Transcripts.com, its employees, contractors, business partners, and clients. Access is limited to authorized personnel and third parties as required. Secret/restricted data includes but is not limited to audit reports, legal documentation, business strategy details and other proprietary documentation.

<u>Secret/restricted data cannot be disclosed by anyone other than the original author, owner or distributor.</u>

It is the responsibility of everyone who works at 4506-Transcripts.com to protect our data. Even unintentional abuse of classified data will be considered punishable in accordance with the extent and frequency of the abuse.

Responsibilities

All employees are responsible for adhering to the policy and reporting any activities that do not comply with this policy.

Management is responsible for ensuring that their direct reports understand the scope and implications of this policy. Human Resource must also ensure that all employees have a signed copy of this policy in their file.

Security staff will be monitoring data for any unauthorized activity and are responsible for updating access requirements as needed.

Any employee who authors or generates corporate or client data must classify that data according to the criteria outlined above.

Management

Ownership of this policy falls to the System Administrator. For any questions about this policy, or to report misuse of corporate or personal data, please contact him/her at (925)927-3333 admin@4506-Transcripts.com. The IT department will work in conjunction with the System Administrator to maintain data access privileges, which will be updated as required when an employee joins or leaves the company.

These are the accepted technologies used to enforce and ensure data security:

- 1. Access controls
- 2. Strong passwords
- 3. System monitoring



Data Breach

If a data breach occurs notifications to all participants will commence immediately. All parties involved (client, user, consumer, etc.) will receive notifications via phone, email, U.S. Mail, any communication method available. The communication will outline what corrective action is being conducted and what steps are needed on the reciprocating end to protect from any malicious activity.

Record Retention

Records are kept on the website for active client use for a period of 90 days. Records are then archived and maintained on servers for a 1 year period before destruction.

Review

Management is responsible for keeping this policy current. This policy will be reviewed annually or as circumstances arise.