



13.17 SOCIAL SECURITY PRIVACY

Pursuant to state law, it is the policy of LADD to protect the confidentiality of social security numbers. No person shall knowingly acquire, disclose, transfer, or unlawfully use the social security number of any employee, person supported, or other individual unless in accordance with the procedures and rules established by this policy.

Social security numbers shall not be placed on identification cards, badges, hard copy timecards, employee rosters, bulletin boards, or any other materials or documents designed for public display. Documents, materials, or computer screens that display social security numbers or other sensitive information shall be kept out of public view at all times. Only authorized employees shall have access to social security numbers. Social Security numbers of people supported must be safeguarded at all times.

Documents containing social security numbers shall only be disclosed in cases where state or federal law, rule, regulation, or court order or rule authorizes, permits, or requires that a social security numbers appear in the document. Documents containing social security numbers, which are sent through the mail, shall not reveal the number through the envelope window or otherwise be visible from outside the envelope or package. Social security numbers shall not be sent through email unless the connection is secure or encrypted.

All documents or files that contain social security numbers shall be stored in a physically secure manner. Social security numbers shall not be stored on computers or other electronic devices that are not secured against unauthorized access. Documents or other materials containing social security numbers shall not be thrown away in the trash; they shall be discarded or destroyed only in a manner that protects their confidentiality, such as shredding.

Social security numbers should only be collected where required by federal and state law or as otherwise permitted under the Michigan Social Security Number Privacy Act. If a unique identifier is needed, then a substitute for the social security number shall be used.

Any person who fails to comply with this policy shall be subject to discipline up to and including separation from employment.

If any questions regarding social security number privacy and security should arise contact the Corporate Compliance Officer.