



POLICY:

It is the policy of Chatham Area Transit Authority to protect the confidentiality of Social Security numbers obtained and used in the course of business. All executives, managers and employees are expected to rigorously adhere to this policy. Any employee violating the provisions of this policy and its operating procedures will be disciplined in accordance with Company rules.

POLICY SPECIFICS:

Collection of Numbers

Social Security numbers will be collected from applicants and employees as required in order to meet federal and/or state reporting requirements. These purposes include:

- To conduct pre-employment background checks.
- To verify eligibility for employment.
- To withhold federal and state taxes.
- To comply with state new-hire reporting.
- To facilitate enrollment in Company benefits plans.

Note: Social Security numbers may also be collected from creditors, suppliers or independent contractors where no tax identification or employer identification number is accessible. Social Security numbers so obtained will be subject to the same provisions of the privacy policy as those for applicants and employees.

Use of Numbers

Except for verification and reporting uses for the above-referenced reasons, no Social Security number or portion of a Social Security number will be used in the conduct of the Company's business; and,

- No Social Security number or portion of a Social Security number will be permitted to be used for the following purposes: identification badges, parking permits, time cards, posted employee rosters, computer passwords, licenses, agreements or contracts.
- No Social Security number should be used in open computer transmissions except where such transmission of information is by secure connection.

Storage of and Access to Numbers:

- Storage: All documents containing Social Security numbers shall be stored in locked secured filing cabinets. All computer applications containing Social Security numbers shall be maintained on secured, authorized-access computer stations only.



- Access: Only persons who have a legitimate business reason will have access to Social Security numbers; such access will be granted through department heads responsible for functions with reporting or transporting of such data responsibilities. Department heads and employees granted such access must take all necessary precautions to ensure the integrity of records that include such numbers when the records are not being used.

Destruction of Numbers

Records that include Social Security numbers will be maintained in accordance with federal and state laws. When such documents are released for destruction, the records will be destroyed by shredding.

State Laws: Where this Company policy and operating procedures may conflict with a state law in any state in which the Company operates, the state law shall supersede this policy.

APPLIES TO:

All employees of Chatham Area Transit Authority.