

CONNECTICUT RIVER WATERSHED COUNCIL, INC.

DOCUMENT MANAGEMENT & WRITTEN INFORMATION SECURITY POLICY

The Council's document management policy is intended to cover all documents produced and held by the organization and meet or exceed any applicable legal requirements of each of the four states within the watershed.

This policy includes the retention schedule, management policies for donor and personal information and a summary of document locations.

DOCUMENT RETENTION SCHEDULE

<i>Document category</i>	<i>Retention timeframe</i>
Accounts payable ledgers and schedules	10 years
Accounts receivable ledgers and schedules	10 years
Audit reports of accountants	Permanently
IRS Form 990s	Permanently
Bank statements	10 years
Capital stock and bond records: ledgers, transfer payments, stubs showing issues, record of interest coupon, options, etc.	Permanently
Cash books	10 years
Cancelled checks (not included in bank statements)	10 years
Leases (expired)	10 years
Contracts (completed)	10 years
Correspondence – general	4 years
Credit card statements	10 years
Correspondence – legal, real estate, financial	Permanently
Depreciation schedules	10 years
Donation records of endowment funds and of significant restricted funds	Permanently
Donation records: including electronic and paper correspondence that document representations relied upon in making the gift.	10 years
Duplicate deposit slips	10 years
Employee personnel records (after termination)	7 years
Employment applications	3 years
Expense analyses and expense distribution schedules (includes allowance and reimbursement of employees, officers, etc., for travel and other expenses: 10 years	10 years
Financial statements (end-of-year)	Permanently

General ledgers and EOY statements	Permanently
Insurance policies, claims, accident reports	Permanently
Inventories	10 years
Invoices (to customers; from vendors)	10 years
Journals & subsidiary ledgers	10 years
Minutes of Board of Trustees meetings; by-laws and articles of incorporation	Permanently
Payroll records and summaries	10 years
Purchase orders	3 years
Sales records	10 years
Subsidiary ledgers	10 years
Timesheets	10 years
Voucher register & schedules	10 years
Volunteer records	3 years

Warning: All permitted document destruction shall be halted if the organization is being investigated by a governmental law enforcement agency, and routine destruction shall not be resumed without the written approval of legal counsel or the Chief Executive Officer.

COMPREHENSIVE WRITTEN INFORMATION SECURITY PLAN

To comply with: Massachusetts 201 CMR 17.00

PART ONE: OBJECTIVES, DEFINITIONS & STANDARDS

I. OBJECTIVES:

Our objective, in the development and implementation of this comprehensive written information security program (“WISP”), is to create effective administrative, technical and physical safeguards for the protection of personal information of residents of the Commonwealth of Massachusetts, and to comply with obligations under 201 CMR 17.00. The WISP sets forth our procedure for evaluating our electronic and physical methods of accessing, collecting, storing, using, transmitting, and protecting personal information of residents of the Commonwealth of Massachusetts.

While this WISP is intended to comply with Massachusetts legislation established to protect the personal information of Massachusetts residents, CRWC’s objective is to protect the personal information of all of its donors, members, supporters and staff, no matter in what state they reside.

For purposes of this WISP, “personal information” means an individual’s first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such resident: (a) Social Security number; (b) driver’s license number or state-issued identification card number; or (c) financial account number, or credit or debit card number, with or without any required security code, access code, personal identification number or password, that would permit access to a resident’s financial account; provided, however, that “personal information” shall not include information that is lawfully obtained from publicly available information, or from federal, state or local government records lawfully made available to the general public.

II. PURPOSE:

The purpose of the WISP is to: (a) Ensure the security and confidentiality of personal information; (b) Protect against any anticipated threats or hazards to the security or integrity of such information (c) Protect against unauthorized access to or use of such information in a manner that creates a substantial risk of identity theft or fraud.

III. SCOPE:

In formulating and implementing the WISP, CRWC shall:

- Identify reasonably foreseeable internal and external risks to the security, confidentiality, and/or integrity of any electronic, paper or other records containing personal information;
- Assess the likelihood and potential damage of these threats, taking into consideration the sensitivity of the personal information;
- Evaluate the sufficiency of existing policies, procedures, customer information systems, and other safeguards in place to control risks;

- Design and implement a WISP that puts safeguards in place to minimize those risks, consistent with the requirements of 201 CMR 17.00; and
- Regularly monitor the effectiveness of those safeguards.

IV. DATA SECURITY COORDINATOR:

CRWC has designated Alan Morgan, Office Manager, to implement, supervise and maintain the WISP. This designated employee (the “Data Security Coordinator”) will be responsible for:

- Initial implementation of the WISP;
- Training employees;
- Regular testing of the WISP’s safeguards;
- Evaluating the ability of each of our third party service providers to implement and maintain appropriate security measures for the personal information to which we have permitted them access, consistent with 201 CMR 17.00; and requiring such third party service providers by contract to implement and maintain appropriate security measures;
- Reviewing the scope of the security measures in the WISP at least annually, or whenever there is a material change in our business practices that may implicate the security or integrity of records containing personal information; and
- Conducting an annual training session for all owners, managers, employees and independent contractors, including temporary and contract employees who have access to personal information on the elements of the WISP. All attendees at such training sessions are required to certify their attendance at the training, and their familiarity with CRWC’s requirements for ensuring the protection of personal information.

V. INTERNAL RISKS:

To combat internal risks to the security, confidentiality, and/or integrity of any electronic, paper or other records containing personal information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following measures are mandatory and are effective immediately:

- A copy of the WISP shall be distributed to each employee who shall, upon receipt of the WISP, acknowledge in writing that he/she has received a copy of the WISP.
- There shall be immediate retraining of employees on the detailed provisions of the WISP.
- Employment shall be amended immediately to require all employees to comply with the provisions of the WISP, and to prohibit any nonconforming use of personal information during or after employment; with mandatory disciplinary action to be taken for violation of security provisions of the WISP (The nature of the disciplinary measures may depend on a number of factors including the nature of the violation and the nature of the personal information affected by the violation).
- The amount of personal information collected shall be limited to that amount reasonably necessary to accomplish CRWC’s legitimate business purposes, or necessary to us to comply with other state or federal regulations.

- Access to records containing personal information shall be limited to those persons who are reasonably required to know such information in order to accomplish our legitimate charitable purposes or to enable us to comply with other state or federal regulations.
- Electronic access to user identification after multiple unsuccessful attempts to gain access shall be blocked.
- All security measures shall be reviewed at least annually, or whenever there is a material change in our business practices that may reasonably implicate the security or integrity of records containing personal information. The Data Security Coordinator shall be responsible for this review and shall fully apprise management of the results of that review and any recommendations for improved security arising out of that review.
- Terminated employees shall return all records containing personal information, in any form, that may at the time of such termination be in the former employee's possession (including all such information stored on laptops or other portable devices or media, and in files, records, work papers, etc.)
- A terminated employee's physical and electronic access to personal information shall be immediately blocked. Such terminated employee shall be required to surrender all keys, IDs or access codes or badges, business cards, and the like, that permit access to CRWC's premises or information. A terminated employee's remote electronic access to personal information shall be disabled; his/her voicemail access, e-mail access, internet access, and passwords shall be invalidated. The Data Security Coordinator shall maintain a highly secured master list of all lock combinations, passwords and keys.
- Current employees' user ID's and passwords shall be changed periodically.
- Access to personal information shall be restricted to active users and active user accounts only.
- Employees are encouraged to report any suspicious or unauthorized use of customer information.
- Whenever there is an incident that requires notification under M.G.L. c. 93H, §3, there shall be an immediate mandatory post-incident review of events and actions taken, if any, with a view to determining whether any changes in our security practices are required to improve the security of personal information for which we are responsible.
- Employees are prohibited from keeping open files containing personal information on their desks when they are not at their desks.
- At the end of the work day, all files and other records containing personal information shall be secured in a manner that is consistent with the WISP's rules for protecting the security of personal information.
- Each department shall develop rules (bearing in mind the business needs of that department) that ensure that reasonable restrictions upon physical access to records containing personal information are in place, including a written procedure that sets forth the manner in which physical access to such records in that department is to be restricted; and each department shall store such records and data in locked facilities, secure storage areas or locked containers.

- Access to electronically stored personal information shall be electronically limited to those employees having a unique log-in ID; and re-log-in shall be required when a computer has been inactive for more than a few minutes.
- Visitors' access shall be restricted to one entry point for each building in which personal information is stored, and visitors shall be required to present a photo ID, sign-in and wear a plainly visible "GUEST" badge or tag. Visitors shall not be permitted to visit unescorted any area within our premises that contains personal information.
- Paper or electronic records (including records stored on hard drives or other electronic media) containing personal information shall be disposed of only in a manner that complies with M.G.L. c. 93I.

VI. EXTERNAL RISKS

To combat external risks to the security, confidentiality, and/or integrity of any electronic, paper or other records containing personal information, and evaluating and improving, where necessary, the effectiveness of the current safeguards for limiting such risks, the following measures shall be taken:

- There shall be reasonably up-to-date firewall protection and operating system security patches, reasonably designed to maintain the integrity of the personal information, installed on all systems processing personal information.
- There shall be reasonably up-to-date versions of system security agent software which must include malware protection and reasonably up-to-date patches and virus definitions, installed on all systems processing personal information.
- To the extent technically feasible, all personal information stored on laptops or other portable devices shall be encrypted, as must all records and files transmitted across public networks or wirelessly, to the extent technically feasible. Encryption here means the transformation of data into a form in which meaning cannot be assigned without the use of a confidential process or key, unless further defined by regulation by the Office of Consumer Affairs and Business Regulation.
- All computer systems must be monitored for unauthorized use of or access to personal information.
- There shall be secure user authentication protocols in place, including: (1) protocols for control of user IDs and other identifiers; (2) a reasonably secure method of assigning and selecting passwords, or use of unique identifier technologies, such as biometrics or token devices; and (3) control of data security passwords to ensure that such passwords are kept in a secure location.

PART TWO: CRWC OPERATIONS & PROCEDURES

Personal information obtained via USPS:

- Mail is dropped by postal carrier through slot in an exterior door. As soon as received, staff shall sort the mail. Mail that includes personal information shall be placed immediately in the designated locked cabinet.
- During data entry of personal information, staff shall observe practices outlined above.

- During data entry, staff shall record only in the database only the last four numbers on an individual's credit card.
- Immediately after entering a credit card number in the database, staff shall obscure all written credit card numbers except the last four digits.
- Immediately after completing data entry, staff shall place all written donations information into designated locked cabinet.

Personal information obtained via online donations:

- Staff accesses a secure website to process credit card donations.
- All paper records of these transactions record only the last four digits of credit card numbers.
- All paper records of these transactions shall be placed immediately in the designated locked storage cabinet.

Personal information obtained via telephone:

- All credit card information obtained in this way shall be treated as above.