

NEW HEIGHTS SCHOOLS, INC.

POLICY 406b

EMPLOYEE INFORMATION SECURITY

POLICY MANAGEMENT

Adopted: 4/2008

Reviewed/ Revised: 7/11*, 7/17, 9/18, 9/21*

Mandatory: Yes

Frequency: Every 3 years

Distribution: Website

I. PURPOSE

New Heights School is adopting this policy to meet and exceed current Federal & State legal requirements pertaining to information security. New Heights School not only secures “student” and “parent” identities but also “employee” and “business” identities. This policy will help protect employees, contractors and New Heights School from damages related to loss or misuse of sensitive information. This policy will:

1. Define sensitive information
2. Describe policies & procedures that safeguard sensitive information.
3. Describe physical office security that safeguards sensitive information.
4. Describe computer & network security that safeguard sensitive information.
5. Describe planned policies & procedures to further safeguard sensitive information.
6. Raise employee awareness of data breaches and identity theft. Offer information regarding personal identity theft protection.

II. SCOPE

This policy applies to employees, contractors, consultants, temporaries, and other workers at the school, including all personnel affiliated with third parties.

III. DEFINITION OF SENSITIVE INFORMATION

- A. Personal Information – Sensitive information consists of personal information including, but not limited to:
 1. Credit Card Information, including any of the following:
 - a. Credit Card Number (part or whole)
 - b. Credit Card Expiration Date
 - c. Cardholder Name
 - d. Cardholder Address
- B. Tax Identification Numbers, including:
 1. Social Security Number (part or whole)
 2. Business Identification Number
- C. Payroll information, including, among other information:
 1. Paychecks

- 2. Pay stubs
- 3. Pay rates
- D. Cafeteria Plan Check Requests and associated paperwork:
- E. Employee medical Information, including but not limited to:
 - 1. Doctor names and claims
 - 2. Insurance claims
 - 3. Prescriptions
 - 4. Any personal medical information
- F. Other Personal Information belonging to Students, Parents, Employees and Contractors, examples of which include:
 - 1. Date of Birth
 - 2. Address
 - 3. Phone Numbers
 - 4. Maiden Name
- G. Office Information – Sensitive office information includes, but not limited to:
 - 1. Any document marked “Confidential,” “Sensitive,” or any document similarly labeled.
 - 2. New Heights School personnel are encouraged to use common sense judgment in securing office confidential information to the proper extent. If an employee is uncertain of the sensitivity of a particular piece of information, he/she should contact their supervisor/manager.

V. PHYSICAL OFFICE SECURITY

- A. Everything with student/parent or employee personal information on it is shredded when it is no longer needed.
- B. During school operating hours the side and back doors are locked. Visitors must use the main school entrance. Notices are posted on all entrances that visitors must report to the main school office.
- C. During non-operating hours a monitored security system including alarm and police/fire notification is active at New Heights School.

VI. COMPUTER & NETWORK SECURITY

- A. New Heights School’s computer & network policies comply with Minnesota and Federal statutory requirements:
 - 1. Develop and maintain secure systems and applications.
 - 2. Restrict access to educational purposes.
 - 3. Assign unique ID to each person with computer access.
 - 4. Regularly test security systems and processes.
 - 5. Maintain a policy that addresses information security.
- B. Passwords are required to logon to New Heights School’s computers. These passwords are changed often.
- C. New Heights School has a firewall to protect its computer network.
- D. New Heights School updates their operating system, anti-virus and other software regularly to make sure they are using the most current versions available.

- E. New Heights School uses Cyber-Security Tools regularly to detect network security vulnerabilities, suspicious network related activity, and to verify that files have not been tampered with.
- F. New Heights School uses e-mail filtering software to screen e-mail and identify suspect messages and maintains a policy of not including sensitive information in unencrypted e-mail. This policy does not allow “Phishing” responses requesting sensitive information.

VII. COMPUTER/E-MAIL DATA BREACH TECHNIQUES

- A. Phishing - Sending e-mail to a user falsely claiming to be an established legitimate company in an attempt to scam the user into surrendering private information that will be used for identity theft. The email directs the user to visit a website where they are asked to update personal information, such as passwords and credit card, social security and bank account numbers that the legitimate organization already has. The Web site, however, is bogus and set up only to steal the user’s information.
- B. Spear Phishing - A type of phishing attack that focuses on a single user or department within an organization, addressed from someone within the company in a position of trust and requesting information such as logon IDs and password. Spear phishing scams will often appear to be from a company's own human resources or technical support and may ask employees to update their username and passwords. Once hackers get this data they can gain entry into secured networks. Another type of spear phishing attack will ask users to click on a link, which deploys spyware can thief data.

VIII. ADMINISTRATION

New Heights School administration shall:

- A. Establish a policy and create a data secure environment.
- B. Provide employees with the policy and relevant information on identity theft.
- C. Ensure a data secure environment dealing with areas that are covered in the policy.
- D. Investigate breaches in data security and take appropriate action.

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