



Liberty Healthcare Corporation and Affiliates (Liberty) Standard Operating Policies

Title:	Protection of Personal Identifiable Information	Effective Date:	01/07/2016
Author:	Camille Tanner	Last Review Date:	06/23/2021
Location:	All Locations	Last Revision Date:	
Functional Area:	Human Resources		

POLICY

While performing assigned duties, Liberty Healthcare Corporation and Affiliates (Liberty) employees have access to Personal Identifiable Information. Personal Identifiable Information is that information that directly or indirectly identifies an individual. The most common directly identifiable personal information is Social Security number, name, address, phone number and e-mail addresses. Indirect identification may be the identification of an individual by the use of a combination of data points such as gender, race, date of birth or other descriptors. It is the responsibility of all users to protect data to which they have access while performing their assigned duties. The procedures listed below have been created to protect this information and insure that no breach of privacy occurs.

PROCEDURE

All Personal Identifiable Information (PII) was acquired with the written consent of the individual and can be found in both paper and electronic documents. Liberty will strive to keep all PII accurate and up to date. Liberty employees will have access to PII on a need to know basis only.

Liberty implemented a “clean desk” policy so all PII will be maintained in secure areas, both physical and electronic. Physical locations include locked filing cabinets in secured locations throughout the office. Electronically all PII must be stored on a Liberty server which is firewall protected and backed up each day. No PII may be stored on a non-password protected local hard drive, USB, CD, or laptop, tablet or non-password protected phone. PII may only be sent through an encrypted e-mail system and only to those individuals who have a need to know. Hard copies such as facsimile copies or copies received via U.S. Mail will be routed to the appropriate Liberty personnel and per the “clean desk” policy shall not be left out in the open. PII in paper format that is no longer needed will be destroyed by shredding. PII that is required to be retained shall be placed in either an appropriate personnel file or electronically scanned and stored in Liberty’s electronic filing system.

Approved By: _____

Revision History

Version	Date	Author	Summary of Changes
#1	01/07/2016	Camille Tanner	Policy Created
#2	10/30/2020	Camille Tanner	Policy reviewed; no changes
#3	06/23/2021	Camille Tanner	Police reviewed; no changes