



NATIONAL REMEMBER OUR TROOPS CAMPAIGN

Remembering All Who Serve & Have Served



Web: nrotc.org EMAIL: admin@nrotc.org Phone: 800-951-3770 Fax: 888-294-6623

Privacy Policy

PURPOSE

National Remember Our Troops Campaign Incorporated protects all data and personal information submitted and or collected by NROTC Inc. to the best of our ability as illustrated by the strict enforcement of the statements contained within the NROTC privacy policy as approved by the executive committee on December 6, 2017. This policy stands approved.

SCOPE

1. This policy applies to all organization's employees, management, and direct independent contractors. The policy describes National Remember Our Troops Campaign Inc. dba (NROTC) objectives and policies regarding maintaining the privacy of personal information.

RESPONSIBILITIES

1. Executives/Management

1. Establish all charitable program objectives to comply with the NROTC privacy standard so no individual personal information is put at risk.
Approve privacy policy for each new charitable program and review implementation for each.
2. Provide training for work force

Privacy Official and/or Executive Director

1. Develops privacy policies and procedures Coordinates and implements policy through organization's departments and regions.
2. Oversees training
3. Receives and processes privacy complaints
4. Processes individual rights requests
 - Right to access/the individual's own records & history
 - Right to restrict use/disclosure
 - Right to confidential communications
 - Right to an accounting of disclosures
 - Right to file a complaint

December 6, 2017

Page 2

Legal Counsel (or Privacy Official)

1. Processes Business Associate Agreements (BAA)
 1. Conducts business associate inventory
 2. Develops and coordinates BAA template
 3. Conducts annual review/update

Corporate Compliance Officer using PC MATIC SUPER SHIELD

1. Assists in development and execution of the and promulgation of operating procedures
2. Assists and supports the Privacy Official
3. Provides support WHITE LIST required data list activities

Records Director with support from Goggle Support, Google Cloud Drive

1. Implements organization's privacy policy for all cloud housed data that must be secured to Super Shield level 6 compliance.
2. Provides administrative and physical safeguards for the protection of all cloud located information relevant to NROTC Inc.

Director, Training

1. Develops and implements privacy training program as described in Section 11 of the 2018 Procedure Manual
2. Documents the delivery of privacy training to all work force members

Independent Contractor responsibilities

1. Understand and comply with organization's policies regarding confidentiality and privacy

DESIGNATED RECORDS [Repository]

1. Google Drive (cloud) accessed via Google Mail address admin@nrotc.org. This auto encrypts and auto deploys Super Shield when PW code is entered.
2. Juniper Edge switch server blade numbers 1, & 2 located in the NROTC accounting Office that is accessed via the va.gov nipernet and is restricted to those individuals with the symantic key flash drive deployed @ the confidential level.
3. Individual PCs for booker program, and Personnel within each Region It is understood that all data held at these repositories are individually secured by the individual level. During 2018 these individual files are to be scanned, cleaned (by PC MATIC) and moved to the Google Drive.

MINIMUM NECESSARY POLICY

1. PC Matic Super shield is to be run at 4 designated times during the day 365 days per year. To ensure no viruses or ransom-ware have penetrated either the data bases or any documents maintained. To confirm and document that all data breaches attempted have failed.

USE AND/OR DISCLOSURE OF PROTECTED INFORMATION

1. Routine uses: Access of relevant files by individual Regional Managers, Corporate financial records by Audit Committee, and Personnel records by Managers to evaluate applicants, and update files.

December 6, 2017

Page 3

Process for disclosing information: NO donor information is to be disclosed or sold by the organization personnel or vendors. All individual donor data is considered confidential.

INDIVIDUAL RIGHTS

1. Right to access: Right to restrict use or disclosure: does not include garnishments requested by the IRS or a State Agency
2. Right to confidential communications
3. Right to an accounting of disclosures Right to file a complaint

SAFEGUARDS FOR THE PROTECTION of Personal Information

1. Administrative safeguards: Password Protected Back Office on Web. Upon application IP address is captured and held. Privacy is auto scanned daily. If infection is found the owner of the affected IP address is immediately notified by the NROTC compliance officer.
2. Physical safeguards: Records are backed up daily to the Juniper switch/router that is only accessible via the approved encryption code, mask, and IP address, as secured by Earthlink.
3. Technical safeguards: Google, PC Matic, and Earthlink security levels. 24 scan periods are monitored and auto resolved after each deep scan inclusive of all registry, document, and white list data held on the network or submitting address. All unsecured data is auto-rejected by the network.

WORK FORCE TRAINING

1. Every new IC is required to review Section 11 of the 2018 Procedure manual.
 1. New staff member training: Each manager is required to complete the PC Matic 1-hour web safety course.
 2. Recurrent training: monthly review of all breach attempts and procedures.

SANCTIONS

1. The staff member found deficient in adequate procedures to ensure the safety of NROTC INC data will be charged the amount of USD required by NROTC to repair any successful breach. An exception occurs when Google, Earthlink, PC Matic and/or Symantec privacy policy protection statements superseded due to direct cause and effect actuarial findings.