Temple 5202 Real Estate Inc.

# Social Security Number Policy



## Version 1.0

## Date: 10/10/2017

# Policy Maintenance and Change Management Record

Record the policy updates including the mandatory annual reviews here. Record the author, the reviewer and the approver name, signature and date. Also record a brief summary of the updates or changes to the policy. For mandatory annual reviews that did not result in any updates, record “No updates” in summary of changes column.

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| --- | --- | --- | --- | --- | --- |
| Version | Author | Reviewer | Approver | Change type | Summary of changes |
| 1.0 |  |  |  | Annual Review & Policy Change | Initial Draft |
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##

## Overview

### Company

Based out of the Philadelphia, Temple 5202 Real Estate Inc. is the home of the world’s market-leading residential and commercial brokerages in over 112 countries, with 789 firms around the world and 189,000 employees generating over 3.1 million transactions valued at 1 trillion annually. Our company was ranked as the top 10 most in innovative companies of 2017 by Forbes and Fast Company magazine. Our continues innovations and unique approach to real estate has allowed us to have an incredible growth compared to our competition, in the last year alone our revenue increased by double digits.

Temple 5202 INC. is dedicated to create a policy that protects our associates and clients Social Security Numbers (SSNs) because we handle an extraordinary amount of daily transaction that contains confidential information including Social Security Numbers (SSNs).

All employees are responsible for reviewing this policy and to conduct business according to this policy. In addition, this policy will be reviewed and approved by the Chief Information Security Officer (CIO) on an annual basis.

### Purpose and Objectives

The purpose of this policy is to establish a policy governing the collection, maintenance, use and disclosure of Social Security Numbers (SSN). Maintaining the privacy and proper handling of our associates and clients Social Security Numbers (SSNs) is critical and the primary focus. In addition, Temple 5202 Real Estate Inc. wants to further define how to collect, maintain, use and disclose Social Security Numbers (SSN) and provide the procedures and awareness to maintain full compliance with all privacy and data protection laws applicable.

The main objectives of this policy are to

* Define the risks and related security controls pertaining to Social Security Numbers (SSN)
* Define the security requirements to protect Social Security Numbers (SSN)
* Set the criteria to address Social Security Numbers (SSN) risks comprehensively

This policy is also here to inform associates of proper procedures to collect, maintain, use, and disclose Social Security Numbers (SSN). All employees are expected to follow this policy and anyone violating this policy will be subject to disciplinary action, up to and including termination and/ or criminal prosecution.

### Background

Businesses rely on information systems and processes to run their business processes and services. The risks to the information systems and services could have a serious negative impact on the businesses and specifically Social Security Numbers (SSN). Temple 5202 Real Estate Inc. business relies on following information systems and services to operate efficiently and effectively.

Transaction Processing Systems

Management Information System

Decision Support System

Executive Information System

### Risks and Challenges

The data and IT systems that process this data form a major part of the information assets of an enterprise. These systems are subject to various types of threats from errors to malicious acts and are constantly changing and evolving with the introduction of newer technologies that are increasingly complex and inter-connected. These threats attempt to compromise the confidentiality, integrity and availability of the information systems, by exploiting the vulnerabilities in technologies, processes and people.

### Roles and Responsibilities

The Information Security Officer is responsible for implementing this Social Security Number Policy. The steering committee is responsible for approving the policy. All staff, which has responsibility for information security tasks must familiarize themselves this Social Security Number Policy and other related policies and procedures.

### Scope and Exemptions

This policy is applicable to all information within the company no matter to whom it belongs or how it is stored, processed, transferred or disposed – with or without the use of IT.

It is also applicable to information held by third-parties or partners on behalf of the company

It is applicable to all staff – permanent, temporary, contractor, suppliers and visitors who may potentially have access to company information.

Any request for an exception to this policy should be directed to the Human Resource department. All exceptions must be submitted in writing and reviewed by an exception committee before an approval for exception can be issued.

## Policy

### Administrative Controls

### Collection of Social security number from employees will be used to meet federal, state and local reporting requirements.

### Employees will not be asked to provide Social Security # to conduct any business such as identification. An employee # will be provided for Identification purposes.

### Collection of Social Security number from clients will only be or use to facilitate the transaction of the real estate sale.

### Employees should not trash paper work that that contains Social Security information before shredding the paperwork or destroying the information properly to remain confidentiality.

### Employee will have limited access to social security information.

### Employee working with paper work that contain social security number information such as tax return should not leave it in the open when done with the paper work.

### All Social Security information shall be black out when information is given to outside vendors such as third-party auditors.

### Employees shall not publicly display or discuss in any manner a client/ employee Social Security Number.

### Technical Controls

### Social Security number should not be emailed unless the information is encrypted.

### To access social security number information in the system employees must enter their login and password.

### Access to Social Security information will be time stamped.

### All employee should not send sensitive information using personal emails.

### All computers must be locked unless an employee is currently using the work station.

### Sensitive information should not be downloaded into external drive.

### Physical Controls

### Social security information shall be stored and filed in a secured location that is locked.

### While working with sensitive information at your desk information must be locked in your drawer.

### All papers must be shredded if they contain social security information before being disposed of.

### Legal and Regulatory Compliance

Legal and regulatory compliance affecting Social Security Numbers (SSN) should be recognized and documented.

A review of compliance with legal and regulatory requirement that affect the Social Security Numbers (SSN) should be performed on an annual basis, or when new legislation of regulatory requirements come into effect.

The review must involve representatives from key areas of organization such as executive management, business owners, legal, and IT management.

### Asset Management

All hardware/software should be recorded in an accurate and up-to-date asset register to support risk based decisions regarding hardware/software and reduce the risk of Social Security Numbers (SSN) being compromised by weaknesses in hardware/software, protect assets against loss, support development of contracts and meet compliance requirements for licensing.

### Other Related Security Policies

Appropriate information security policies and procedures must be developed, implemented and enforced to ensure protection of critical information security assets

* Physical security policy
* Data Classification
* Data Retention
* Vendor Management
* Mobile Device Management
* Threat & Vulnerability Management
* Incident Response & Management
* Identity and Access Management
* System Development Management
* Change Management
* Business Continuity and Disaster Recovery

### Compliance / Enforcement

Not adhering to these polices will result in strict disciplinary action that include but are not limited to termination and/or suspension with or without pay. All third parties that do not follow these policies will experience their rights to this access revoked and possible loss of contract and/or employment.