

## CONFIDENTIALITY OF SOCIAL SECURITY NUMBERS

Davidson, Dawson & Clark LLP has standard procedures to protect the confidentiality of the Social Security Numbers we collect. Connecticut law requires such a policy and a written policy is advisable in any event to maintain a happy and successful relationship with each client.

### 1. LIMITATIONS ON ACCESS

Our policy is to limit access to any document with a Social Security Number to the attorneys, paralegals and support staff that require access to the document for the efficient provision of professional services. Otherwise, personnel shall not access a document with a Social Security Number.

### 2. HANDLING OF DOCUMENTS AND ELECTRONIC DATA

We will use a document with a Social Security Number only in locations where, at the time of use, the Social Security Number is not visible by a person other than (i) the person to whom the Social Security Number belongs and (ii) a person agreed to, expressly or implicitly, by the client. Otherwise, such documents shall be stored in a client file or on our secure server.

We will not physically remove a document with a Social Security Number from our office, except that attorneys and paralegals can remove such a document as reasonably necessary for the efficient provision of professional services. When removed from the office, attorneys and paralegals will make reasonable efforts to transport and store the document in a secure manner.

When we transport or transmit a document with a Social Security Number, we will use a reasonably secure method of transportation or transmission.

### 3. DISCLOSURE OF SOCIAL SECURITY NUMBERS

All employees are expressly prohibited from unlawfully disclosing Social Security Numbers that we collect. All Social Security Numbers are held in confidence, and are not released to persons outside the firm, except as expressly or implicitly agreed to by the client, or as required by law. When disclosure is authorized or required by law, we will disclose the Social Security Number through a reasonably secure method of transmission.

### 4. DESTRUCTION OF DOCUMENTS AND ELECTRONIC DATA

A document that contains a Social Security Number shall be discarded only by being shredded or placed in a designated receptacle for shredding. All

documents placed in the designated receptacle shall be shredded on-site by our personnel prior to its further disposal.

Electronic data being deleted that contains a Social Security Number will be erased or made unreadable.

#### 5. TRAINING OF PERSONNEL

We distribute and discuss the procedures described in this Memorandum with all individuals upon their initial employment.

We encourage questions about the policy and compliance with the policy at all times.

A copy of this Policy will be posted in a common work area.

#### 6. REVIEW AND REVISIONS OF THESE PROCEDURES

We periodically review our standard procedures pertaining to the protection of Social Security Numbers.

We may modify or update this Memorandum as required by law or otherwise. Upon making any modifications or updates, we will notify our employees of these revisions and we will post the revised Memorandum in the common work area.

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