



Social Security Number (SSN) Privacy Policy

I. Policy

- a. Management and Unions Serving Together (M.U.S.T.) collects and maintains social security numbers of personnel in the ordinary course of its business. M.U.S.T. will handle social security numbers with a high degree of security and confidentiality.

II. Regulations

- a. In an effort to protect the privacy rights of individuals who provide social security numbers to M.U.S.T. and to manage its *record* and *record systems* responsibly, M.U.S.T. will:
 - i. ensure, to the extent practicable, the confidentiality of social security numbers. Social security numbers are considered *sensitive data* elements and will be managed and protected accordingly.
 - ii. not unlawfully disclose an individual's social security number;
 - iii. strictly limit access to *records* and *record systems* containing social security numbers.
 - iv. dispose of *records* containing social security numbers in a responsible manner that minimizes risk that the social security numbers can be accessed inappropriately.
- b. Social security numbers will not be:
 - i. publicly displayed;
 - ii. used as the primary account number or identifier for an individual, except where existing M.U.S.T. *records* or *record systems* require such use. Existing *records* or *records systems*, when retired, will be replaced with *records* or *record systems* that do not require or use social security number as the primary account number or identifier;
 - iii. visibly printed on identification cards or badges; or

- iv. used, transmitted, or stored on *records* or *record systems* that are not encrypted or secure.
- c. This policy applies to the *records* or *record systems* purchased, developed, and maintained by M.U.S.T..
- d. It is the intention of M.U.S.T. to comply with this policy and with all applicable laws regarding the privacy of social security numbers, including MCL 445.81 et. seq. Corrective action will be taken in the event of intentional violations of this policy. Such action may include the modification of a process, practice, *record* or *record system* to better protect the confidentiality of social security numbers or, if appropriate, disciplinary action in accordance with the applicable disciplinary policy. Loss or theft of social security numbers from M.U.S.T. *records* or *record systems* will be promptly reported to the appropriate parties for responsive action.

III. Definitions

- a. Records
 - i. A record is any document, file, computer program, database, image, recording, or other means of expressing fixed information.
- b. Record Systems
 - i. Record Systems are ways of storing, disseminating, or organizing records. They include, but are not limited to computers, telephone lines, voice mail, fax machines, and filing cabinets.
- c. Sensitive Data
 - i. Sensitive Data refers to those elements of the M.U.S.T. Database which may not be accessed without specific authorization or to which only limited access may be granted.