

THE BREATHING ROOM FOUNDATION

PRIVACY POLICY

Purpose: The purpose of this Policy is to establish The Breathing Room Foundation's policy regarding the privacy and security of client personal information.

Policy: The Breathing Room Foundation (“**Breathing Room**”) respects our clients' privacy. We require our employees, volunteers and contractors to keep client personal information confidential and secure in accordance with this Policy. We use our clients' personal information only for its intended purpose.

I. Privacy and Security Officer

The Executive Director of Breathing Room will serve as Breathing Room's Privacy and Security Officer.

II. Access to Client Information

Within Breathing Room, access to client personal information (whether paper or electronic) is limited to those employees, volunteers and contractors who need it to perform their duties.

III. Disclosure

Employees, volunteers and contractors must keep client personal information confidential and disclose it only as permitted by this Policy. We allow access to client information to persons and organizations other than Breathing Room under limited circumstances, including when clients or their families authorize the disclosure of their information.

IV. Security Measures

Breathing Room has physical security measures for our building. We maintain virus detection software and have various other safeguards for paper and electronic client personal information, including without limitation:

- All computer/information systems and programs require users to submit user IDs and passwords before they can enter such systems and programs. Passwords must be at least 6 characters, cannot be reused, cannot be the same as user IDs, and must be changed every 6 months.
- When not in use, documents containing client personal information will be secured in locked cabinets.
- Documents containing client personal information shall be kept in folders when being used during the business day.

- Any documents containing client personal information that no longer are needed (*e.g.*, duplicates) will be shredded.
- No visitor shall be left unattended on Breathing Room's premises, and all visitors shall be accompanied by a Breathing Room employee at all times when in an area that contains computers or records or files containing client personal information.

V. Security Incidents

Employees, volunteers and contractors must report to the Privacy and Security Officer any incidents involving breach of the security of electronic or paper records, including but not limited to instances when this Policy is violated. The Privacy and Security Officer or his/her designee shall investigate such incidents and determine whether disciplinary or other action is appropriate.

VI. Training

All employees, volunteers and contractors shall be informed of this Policy and confidentiality and security practices generally.

VII. Removal of Records

Original records (paper or electronic) containing client personal information shall not leave the Breathing Room's premises unless removal is appropriate as described above or required for safeguarding related to a disaster, fire or other event and then, only under a directive from the Executive Director or his/her designee.

VIII. Requests for Records

All requests for copies of records will be forwarded to the Executive Director. Only the Executive Director, the Volunteer Coordinator or either of their designees shall approve the release of records other than as described above.

IX. Mobile Information Sharing

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

X. Questions/Information

Please contact the Breathing Room Executive Director if you have any questions concerning this Policy.

By signing below, I acknowledge that I have received and reviewed this Breathing Room Privacy Policy and agree to comply with it.