

Social Security Number Privacy Policy

It is the policy of RCM to protect the confidentiality of Social Security numbers obtained by RCM during the normal course of business. No person shall knowingly obtain, store, transfer, use, disclose, or dispose of a Social Security number that RCM has obtained or possesses except in accordance with this Policy.

Social Security numbers should be collected only where required by federal and state law or as otherwise permitted by federal and state law for legitimate reasons consistent with this Policy.

Legitimate reasons for collecting a Social Security number include, but are not limited to:

- Applicants who may be required to provide a Social Security number for purposes of a pre-employment background check.
- Copies of Social Security cards may be obtained for purposes of verifying employee eligibility for employment.
- Social Security numbers may be obtained from employees for tax reporting purposes, for new hire reporting or for purpose of enrollment in any Company benefit plans.

Public Display

Documents, materials or computer screens that display all or more than four digits of the Social Security number should be kept out of public view at all times.

Computer Transmission

All or more than four sequential digits of a Social Security number should not be used or transmitted on the Internet or on a computer system or network unless the connection is secure or the transmission is encrypted.

Storage

All documents containing the Social Security numbers should be stored in a physically secure manner. Social Security numbers should not be stored on computers or other electronic devices that are not secured against unauthorized access.

Access to Social Security Numbers

Only personnel who have legitimate business reasons to know will have access to records containing Social Security numbers. Each department manager, in conjunction with Human Resources, shall determine which other personnel within their departments have a legitimate reason, in the ordinary course of their work, to have access to Social Security numbers. All employees who have access and use records containing Social Security numbers must take appropriate steps to secure such records when not in immediate use.

Disposal

Documents containing Social Security numbers will be retained in accordance with the requirements of state and federal laws. At such time as documents containing Social Security numbers may be disposed of, such disposal shall be accomplished in a manner that protects the confidentiality of the Social Security numbers, such as shredding.

Unauthorized Use or Disclosure of Social Security Numbers

RCM shall take reasonable measures to enforce this Privacy Policy and to correct and prevent the reoccurrence of any known violations. Any employee, who knowingly obtains, uses or discloses Social Security numbers for unlawful purposes or contrary to the requirements of this policy shall be subject to discipline, up to and including termination. Additionally, certain violations carry civil or criminal sanctions. RCM will cooperate with law enforcement or other administrative agencies in the apprehension and prosecution of any person who knowingly obtains, uses or discloses Social Security numbers through RCM for unlawful purposes.