



Emtec Inc.

CLEAR DESK POLICY

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Revision History

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Table of contents

I. PURPOSE, SCOPE AND AUDIENCE	4
1. POLICY	5
1.1. WHY PUT A CLEAN DESK POLICY IN PLACE?	5
1.2. STEPS FOR CREATING OUR CLEAN DESK POLICY	5
1.3. CLEAR DESK POLICY	5
1.4. REDUCTION IN THE USE OF PAPER.....	6
1.5. TIPS FOR KEEPING A TIDY DESK.....	7
1.6. POLICY COMPLIANCE.....	7
2. VIOLATIONS	8
3. REFERENCES.....	9

I. Purpose, Scope and Audience

The purpose for this policy is to establish a culture of security and trust for all employees at Emtec Inc. An effective clean desk effort involving the participation and support of all Emtec Inc employees can greatly protect paper documents that contain sensitive information about clients, customers and vendors. All employees should familiarize themselves with the guidelines of this policy.

Clear desk policy not only includes documents and notes, but also post-its, business card, and removable media (CDs, floppy disks, memory sticks).

This policy also ensures Emtec Inc.'s compliance with Data Protection Legislation.

1. Policy

1.1. Why put a clean desk policy in place?

Help protect your company, your clients and your reputation - Most business projects require confidentiality, and everyone in the office handles documents that contain important and often confidential information. That means everyone in your office must protect documents and data from unauthorized access, internally and from outsiders. Maintaining a clean desk policy reduces this risk.

Encourage better organization and productivity for your employees, and provide peace of mind for your customers - When everyone's desk is clean and all areas of the company are free from paper and clutter, your office space looks attractive, professional and efficient. Employees feel more in control in a well-organized environment and your customers are sure to have a good impression of your company.

1.2. Steps for creating our clean desk policy

In order to have a clean desk policy in place, we recommend to follow the 3 "P"s of office organization and follow these yourself to set the best example:

PLAN first thing in the morning - Keep just the things you need for your workday on your desk. Start each day with a few minutes of planning so that you can organize the documents you need for immediate work. File all other folders and documents.

PROTECT information whenever you leave your desk - You obviously have to leave your desk to attend meetings or to take breaks. But whenever you do, make a quick check to see if there is sensitive information on your desk and place it inside a folder or off your desktop. And for additional security, make sure to lock your computer to be password-protected.

PICK UP at the end of the day - When you leave your desk in the evening, don't leave documents on it. In order to maintain the security of both your client and employee information, it's essential to file your documents or lock them up, if necessary. If you get into the habit of cleaning off your desktop every day before you leave, you'll enjoy the added productivity benefits that come with a clean office first thing in the morning.

1.3. Clear Desk Policy

1.3.1 Employees are required to ensure that all sensitive/confidential information in hardcopy or electronic form is secure in their work area at the end of the day and when they are expected to be gone for an extended period.

1.3.2 Computer workstations must be locked when workspace is unoccupied.

1.3.3 Computer workstations must be shut completely down at the end of the work day

1.3.4 Any Restricted or Sensitive information must be removed from the desk and locked in a drawer when the desk is unoccupied and at the end of the work day.

1.3.5 File cabinets containing Restricted or Sensitive information must be kept closed and locked when not in use or when not attended.

1.3.6 Keys used for access to Restricted or Sensitive information must not be left at an unattended desk.

1.3.7 Laptops must be either locked with a locking cable or locked away in a drawer.

1.3.8 Passwords may not be left on sticky notes posted on or under a computer, nor may they be left written down in an accessible location.

1.3.9 Printouts containing Restricted or Sensitive information should be immediately removed from the printer. Do not leave personal confidential information for others to find.

1.3.10 Ensure documents are disposed of securely, sensitive documents should be shredded in the official shredder bins. Never put documents containing sensitive, personal or corporate sensitive information in the general waste bins.

1.3.11 Whiteboards containing Restricted and/or Sensitive information should be erased

1.3.12 Use the scan facility on the photocopier to make an electronic copy, save your electronic copy and then securely destroy the hardcopy.

1.3.13 All Portable Computing & Data Storage Devices (PCDs) such as USB data sticks, Dictaphones, mobile phones and laptops should be placed out of sight, preferably locked away at the end of the working day.

1.4. Reduction in the use of paper

These guidelines are also designed to help reduce the amount of paper that we use. This can also reduce the use of costly toners and the amount of filing space required.

- a) Do not print copies of information from the computer systems if it is not necessary
- b) Please print/copy double sided wherever possible
- c) Undertake routine destruction wherever possible
- d) Many associates use print-offs as a form of backup against losing information from the computer systems. Employees are required to back all their information onto Microsoft OneDrive for Business as and when required

1.5. Tips for keeping a tidy desk

- i) Put a regular date and time in your diary to clear your paperwork
- ii) Use the confidential shredding sack for personal/confidential paper no longer needed
- iii) Use recycling bins for non-personal/confidential papers no longer needed
- iv) Do not print off emails to read them. This just generates increased amounts of clutter
- v) Go through the things on your desk to make sure you need them and what you don't need throw away
- vi) Always clear your desktop before you go home
- vii) Consider scanning paper items and filing them in electronic form with adequate back up facilities

1.6. Policy Compliance

Compliance Measurement - Emtec Operation Team will verify compliance to this policy through various methods, including but not limited to, periodic walkthroughs, video monitoring, business tool reports, internal and external audits, and feedback to the policy owner.

Exceptions - Any exception to the policy must be approved by the Emtec Operations team in advance.

2. Violations

Any violation of this policy may result in disciplinary action, up to and including termination of employment. Emtec Inc. reserves the right to notify the appropriate law enforcement authorities of any unlawful activity and to cooperate in any investigation of such activity. Emtec Inc. does not consider conduct in violation of this policy to be within an employee's or partner's course and scope of employment, or the direct consequence of the discharge of the employee's or partner's duties. Accordingly, to the extent permitted by law, Emtec Inc. reserves the right not to defend or pay any damages awarded against employees or partners that result from violation of this policy.

3. References

- ISO/IEC 27001:2013 – A.11.2.9 - Clear Desk and Clear Screen Policy
- HIPAA Regulatory Reference: HIPAA § 164.310(b), HIPAA §164.312(a)(2)(i)
- HITRUST Reference: 01.h Clear Desk and Clear Screen Policy