

Privacy Management Policy

Privo IT

April 2020

Contents

Table 1: Control satisfaction

Standard	Controls Satisfied
TSC	P1.1, P2.1, P3.1, P3.2, P4.1, P4.2, P4.3, P5.1, P5.2, P6.1, P6.2, P6.3, P6.4, P6.5, P6.6, P6.7, P7.1, P8.1

Table 2: Document history

Date	Comment
November 19, 2019	Initial document

a. *Objective*

One key purpose of the Plan is to create effective administrative, technical and physical safeguards for the protection of personal information of Employees with special consideration for those who are residents of the Commonwealth of Massachusetts and subject to the protections of Massachusetts 201 C.M.R. § 17.00. The Plan sets forth the Privo's procedure for evaluating electronic and physical methods of accessing, collecting, storing, using, transmitting and protecting personal information of residents of the Commonwealth of Massachusetts.

For purposes of this policy, "personal information" means: i. First name and last name or first initial and last name

PLUS one or more of the following:

- 1. Social Security number
- 1. Driver's license number
- 1. State-issued identification card number
- 1. Financial account number
- 1. Credit or debit card number

i. Privo recognizes that it possesses the personal information of Employees in the following

- 1. Employee payroll information
- 1. HR forms
- 1. Direct deposit forms
- 1. other HR-related documents

i. The documents are located in in the following places:

- 1. Google Drive
- 1. On the computers of Executive team members and finance personnel
- 1. In the payroll system

i. This policy is intended to protect this information from unauthorized access and/or use.

- 1. Privo will collect only that information about employees which is needed and relevant
- 1. Privo will strive to make certain that personal information about employees is kept a
- 1. Privo will use appropriate controls to ensure that this information is kept secure, a
- 1. Information about employees will not be disclosed to any external parties unless app
- 1. Employees will be told how they can review information about them, make updates, and
- 1. Privo will comply with applicable laws, regulations, and industry standards when prot

1. We hold our employees, vendors, contractors, suppliers, and trading partners to meet