**Data Transfer Policy**

**1.0 Purpose**

To establish requirements which must be met by all computers connected to 7 Bridges Marketing, LLC., networks while transmitting data in and out of the network as well as within the network.

**2.0 Scope**

This policy applies to all 7 Bridges Marketing, LLC., computers that are used during the transmission of data to and from external vendors, customers or individuals, using company confidential or client confidential data. Special attention needs to be given to the data that is personally identifiable.

**3.0 Policy**

1. 7 Bridges Marketing, LLC., will only transfer sensitive data to external parties if the owner of the data explicitly approves its transfer. For most customer data, the client is the registrar. For other sensitive data, the owner is the highest level figure that would have direct authority over and full responsibility for the data — not necessarily the internal users of that data.
2. This data must be encrypted during transfer. A best practice approach is to use a standard of AES 128 bit encryption, although other levels may be appropriate. This can be achieved using encrypted ZIP files.
3. The key to the encrypted data must be transferred out of bounds. That is it cannot be transferred using the same mechanism as the data. For instance, if the data is sent via e-mail, the key must be exchanged outside of emails, e.g., via phone or letter.
4. The external party must acknowledge receipt of the data. One best practice approach is to create a CD with the encrypted data on it and then to use an overnight shipping company to send it, requesting a return receipt. E-mail acknowledgements are also acceptable although not preferred.
5. The data must be verified as secure before the transfer occurs by a third internal party. The IS security officer or designates can provide this service.
6. The data must be securely archived so that in event of an issue 7 Bridges Marketing, LLC., can verify the exact contents of the data at issue

**4.0 Enforcement**

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

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