



## **Northwest Michigan Community Action Agency** **Privacy and Confidentiality Policy**

This notice describes the privacy and confidentiality policy of the  
**Northwest Michigan Community Action Agency.**

We may amend this policy at any time.

Confidentiality is a primary ethical requirement of NMCAA employees. All client / customer interactions are confidential. When handling financial, personal, service related, and / or eligibility information about clients / customers, or others with whom NMCAA has dealings, the following principles are observed:

- Collecting, using, and retaining only the personal information necessary for NMCAA's business. Whenever possible, obtaining any relevant information directly from the person concerned. Using only reputable and reliable sources to supplement such information.
- Retaining information only for as long as necessary or as required by law. Protecting the physical security of this information.
- Limiting internal access to personal information to those with a legitimate business reason for seeking that information. Using only personal information for the purposes for which it was originally obtained.
- Obtaining written consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.
- Compliance with Michigan Social Security Number Privacy Act through the following:
  - No individual's Social Security number will be obtained unless required by law or for the necessary operations of a legitimate NMCAA program.
  - Disclosure of Social Security numbers will only occur when required by law or program requirement with proper consent/signed release and with appropriate controls in place.
  - Documents which contain Social Security numbers shall be available only to those with a legitimate need for that information.
  - Documents which contain Social Security numbers shall be kept in locked files, accessible by only those with a legitimate need to those documents.
  - Disposal procedures of documents containing Social Security numbers shall include thoroughly shredding or otherwise destroying the documents so that it is not possible to duplicate the Social Security number sequence.