



PUBLIC RELATIONS POLICY

Any communication on behalf of Sunshine Village involving the press, federal, state or local agencies must be handled through the President of the Board of Directors or Executive Director, or their designee.

INFORMATION SECURITY PLAN

Sunshine Village will continue to be actively involved establishing and implementing processes to insure the highest level of protection of the personal information to which it is entrusted. In this regard, the organization will maintain full compliance with 201 CMR 17.00.

Sunshine Village has developed an information security plan ("Plan") in order to create effective administrative, technical and physical safeguards for the protection of personal information. The Plan sets forth Sunshine Village's procedures for evaluating its electronic and physical methods of accessing, collecting, storing, using, transmitting, and protecting personal information of both employees and individuals participating in services ("clients.")

The term "personal information" means the first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to him/her:

1. Social Security Number
2. Driver's license number or state-issued identification card number
3. Financial account number, or credit or debit card number, with or without any required security code, access code, personal identification number or password, that would permit access to an employee's financial account.

Personal information does not include publicly available information, or from federal, state or local government records lawfully made available to the general public.