

## APPENDIX A

# Model Corporate Privacy Policy

### 1. Personal Information

- a. The company will collect personal information concerning employees only when it is needed to perform a legitimate corporate function.
- b. Personal information concerning employees will be disclosed to other employees only when it is necessary for them to do their jobs.
- c. Personal information will be disclosed to parties outside the company only with the permission of the employee or when required by law.
- d. The company will maintain security systems to ensure that the above policies are followed.

### 2. Medical Information

The company may conduct pre-employment medical evaluations to ensure that the individual is capable of performing the job for which he or she is being considered. No such evaluation shall be conducted until the company has made an offer of employment conditioned upon the results of the evaluation. Only medical information that is related to the prospective employee's ability to do the job will be acquired or considered.

### 3. Monitoring

#### a. Computers

Employees are permitted to use company computers for personal purposes so long as such use does not interfere with the employee's job performance or have an adverse impact on the functioning of the company's computer system.

The company will monitor employee computer use only when there is reason to believe that the employee has used the computer in a manner that violates company policy or to evaluate employee job performance.

The employee will be notified if his or her computer is monitored.

The contents of an employee's personal computer will be monitored only if:

- i. the employee brings his or her computer to the workplace, in which it will be subject to monitoring under the same policies as company computers
- or**
- ii. the company has reason to believe that the employee has information in his or her personal computer that is the property of the company.

**b. Video**

- i. Security. The company may install video cameras for security purposes. All such security cameras will be clearly visible.
- ii. The company may also install clearly visible video cameras in work areas. Such cameras will be used only when normal supervisory methods are not adequate.
- iii. The company may install hidden video cameras as part of an investigation into theft or other serious misconduct. Such surveillance shall be conducted only when other investigatory methods are ineffective. Under no circumstances shall video surveillance be conducted in locker rooms or bathrooms.

**c. Telephone**

- i. The company may conduct monitoring of work-related telephone calls as part of a program to ensure quality of service. Employees will be notified when such telephone service observation is taking place.

- ii. The company may conduct computer analysis of the telephone numbers called from workplace phones in order to determine whether excessive personal calls are being made.
- iii. Except as part of an investigation into serious misconduct, the company will not under any circumstances listen to the content of non-work-related calls.

#### d. Employee Location

GPS or other means of locating employees will be used only when there is a legitimate need to know the employee's location. It will not be used when all that is required is the ability to communicate with the employee.

Under no circumstances will GPS or similar technology be used to locate employees while they are off-duty.

#### 4. Off-Duty Conduct

Employment decisions are based upon job performance. The company will not collect information concerning employees' legal off-duty behavior or use such information in making employment decisions.

#### 5. Substance Abuse

It is a serious violation of company policy for any employee to come to work under the influence of alcohol or illegal drugs. If the company has reason to believe that an employee is under the influence of alcohol or illegal drugs, it may conduct an investigation into the employee's condition. Such an investigation may include testing of an employee's breath or bodily fluids.

#### 6. Notice

Except as specifically provided above, employees shall be notified of all information collection or monitoring practices.

## 7. Enforcement

The company will periodically review the activities of employees involved in monitoring, especially monitoring of computers, to ensure that these policies are being followed. Any employee who has reason to believe that company privacy policies are not being followed is requested to inform management. Employees may choose any member of management to inform and may do so in confidence if they desire. No adverse action of any kind will be taken against employees for reporting what they believe to be a violation of this policy.

Appropriate disciplinary action will be taken against employees who violate this policy.