

## **Social Security Number Privacy Policy**

Pursuant to Michigan's Social Security Number Privacy Act (the "Act"), Dorsey School of Business, Inc. will take measures reasonably necessary to ensure the confidentiality of its employees' and students' Social Security numbers and those collected from others in the ordinary course of the company's business. Neither the company nor any of its employees will unlawfully disclose Social Security numbers obtained during the ordinary course of business. The company will limit access to information or documents containing Social Security numbers to only those employees of the company whose job description requires the use of Social Security numbers. In addition, the company will strictly limit the display of Social Security numbers on computer monitors or printed documents, unless required by law or business necessity.

The company will not use Social Security numbers, more than four consecutive numbers from a Social Security number, or a derivation of them as personal identifiers, permit numbers, license numbers, or primary account numbers or for similar uses unless required by law. The company may use a Social Security number to perform an administrative duty related to employment or student's financial aid, including, for example, to verify the identity of an individual; to detect or prevent identity theft; to investigate a claims, credit, criminal, or driving history; to enforce legal rights; or to administer benefits programs.

The company will retain an employee's Social Security number for the duration of the employee's employment and for two years following the employee's termination or for a longer period as required by law. Students' Social Security numbers are indefinitely maintained in a computer database per Department of Education regulations. The company will physically destroy documents that contain Social Security numbers but need to be discarded by shredding or another secure fashion. Social security numbers stored in a computer database that need to be removed will be deleted from all programs pursuant to techniques and standards commonly used for such purposes. All provisions of this policy are subject to the language of the Act.