

## **Privacy and Social Security Number Protection Policy**

The Connecticut Act Concerning the Confidentiality of Social Security Numbers requires that Aetna/ASM/Metro safeguard data, computer files and documents containing personal information from misuse by individuals. The law also requires that Aetna/ASM/Metro destroy, erase or make unreadable such data, computer files and documents prior to disposal. Personal information is information that is associated with a particular individual, such as a social security number, a driver's license number, a state identification card number or a health insurance identification number. Information that is lawfully made available to the public from government records or widely distributed media is not considered to be personal information.

Accordingly, Aetna/ASM/Metro will protect the confidentiality of and restrict access to personal information and social security numbers of employees, contractors or other individuals to only those who have a legitimate business reason to access personal information or documents containing social security numbers.

Employees who have access to social security numbers are prohibited from doing any of the following:

1. Publicly displaying or otherwise unlawfully disclosing any person's social security number.
2. Using a social security number as a primary account number or print it on any identification badge or card.
3. Mailing documents containing social security numbers where the number is visible on or from outside the envelope or packaging.
4. Including all or more than four sequential digits of a social security number on any document mailed unless it is specifically permitted by law, regulation or court order; or is sent as part of an application or enrollment process; or is sent to establish, confirm, amend, or terminate an account or benefit policy.

Aetna/ASM/Metro may use an employee or patient social security number as a primary account number or include it in a mailed document in the ordinary course of business to:

1. Verify an identity, identify an individual, or perform another similar administrative purpose related to an account, transaction or employment.
2. Perform investigations on background, criminal or driving history.

3. Administer health insurance or retirement benefit programs.
4. Administer required federal, state and local tax compliance.

All or more than four sequential digits of social security numbers should not be transmitted over the internet or Aetna/ASM/Metro's e-mail system unless the connection is secure, the transmission is encrypted, or a password or other authentication device is required to gain access to the system.

Documents that contain personal information or a social security number will be shredded when their retention is no longer required or the social security number will be permanently removed if the documents are to be kept on file.

Violations of this policy may result in disciplinary action, up to and including termination of employment. You should be aware that individuals who violate this policy may also be subject to civil and criminal penalties provided for under the law.

*To contact the Corporate Compliance Officer regarding this or other corporate policies:*

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