



July 30, 2020

Council Members/Coaches

Re: Security and Privacy Best Practices

Dear Volunteer,

At SOVA, the security of personal information is *always* of utmost importance to us. During the COVID-19 pandemic, as people work increasingly from home, we think it's especially important to share our data security guidelines at this time.

We seek to use reasonable measures to protect athlete and volunteer information as required by the law, in line with industry standards and in accordance with the policies Special Olympics has set. Sensitive data is held under strict security conditions. If you have any reason to believe that any personal information we hold is no longer secure, please contact us immediately.

Because you are a key volunteer with access to the sensitive data of our athletes, supporters, staff and volunteers, you may hold information in the form of paper based files or computerized information. Any information you hold will be subject to the rules, regardless of whether it is held on paper or on a computer.

You should seek only to collect and record sensitive data on a 'need to know' basis and have written procedures for protecting data. You should also ensure that you have specific security procedures in place to guard against anyone seeing the information that shouldn't or data getting damaged, lost or destroyed.

What do we need from you to help us ensure safety? Read and follow the enclosed Best Practices and share them with your council members and coaches.

Please feel free to contact me at dsutton@specialolympicsva.org if you have questions or concerns. Thank you for supporting our amazing athletes!

Very truly yours,

Donna L. Sutton
Database & Data Privacy Manager

Best Practices for Using & Storing Personally Identifiable Information

1. Paper Records

- a. Store data securely. Keep medical records out of sight of others and file it in a locked area when not in use.
- b. When carrying a medical binder for an event or practice, keep it in your possession/control.
- c. If you need to issue a duplicate medical binder, keep track of who it was given to and make sure it is returned to you. Make sure volunteers know how to safely store and retain control of the binder.
- d. Shred outdated records that are no longer needed – don't leave them in the binders.
- e. When emailing or faxing documents, add the following as a header or footer:

CONFIDENTIAL – this document may contain contact information which is provided for use by Special Olympic Virginia's staff, coaches and registered volunteers only.

- f. Only collect, store and use the minimum amount of data you need for your purpose. Don't keep extra data if you don't know why you need it, and don't keep data that is no longer needed for a clear purpose.

2. Electronic Records

- a. Share the links to any online databases that store personal information with your SOVA Regional Director(s). Include user names and passwords.
- b. Only collect, store and use the minimum amount of data you need for your purpose. Don't keep extra data if you don't know why you need it, and don't keep data that is no longer needed for a clear purpose.
- c. Store data securely. Virus and malware protection is required.
- d. If you must email or fax personal information, add a disclaimer:

This communication may contain CONFIDENTIAL contact information provided for use by Special Olympics Virginia's staff, coaches and registered volunteers only. If you have received this communication in error, please let us know and delete the message/attachment(s). Please do not copy, forward or otherwise disseminate this information.

- e. If you email a document which contains personal information, delete the email from your Sent Items and Empty your trash bin and ask the recipient to do the same.
- f. Do not post personally identifiable information on the web, including on social media.
- g. Password-protect any spreadsheets, databases or other documents that are stored on a web-based platform, such as GoogleDocs.

What is personally identifiable information?

- Full name
 - Photo
 - Birthdate (secured medical form - ok)
 - Address
 - Phone
 - Email
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- ❖ When requesting data using a Google or any other public form, you may not ask for a full birth date. Ask for *age* or *birth month/day*, rather than full birth date, if necessary for assignments.
 - ❖ While one piece of identifiable data may not present much risk, several pieces together do.
 - ❖ Remember to send a link and password for any electronic forms to your SOVA Regional Director.