

# TALMUDICAL SEMINARY OHOLEI TORAH

## INFORMATION SECURITY PROCEDURES POLICY

Talmudical Seminary Oholei Torah has designated Tzvi Rosenfeld as coordinator of the institution's information security program. The program was established to ensure that all consumer data - whether from students, parents or others with whom the Yeshiva has a customer relationship - is safeguarded. The program includes administrative, technical, and physical protection that the Yeshiva uses to access, collect, distribute, process, protect, store, use, transmit, dispose of, or otherwise handle customer information. The safeguards ensure the security and confidentiality of customer information; the protection against anticipated threats or danger to the safety or integrity of such information; and shields against unauthorized access to or use of such information that could result in damage or inconvenience to any customer.

Talmudical Seminary Oholei Torah has executed the following to protect private information: The computers and computer systems in the Yeshiva are password protected, are only accessible to school officials who require entry to the system(s) to fulfill their institutional roles. Each Yeshiva official has his/her own unique password. In addition to the computer password, there is an extra password for each program utilized by Talmudical Seminary Oholei Torah that ensures that only individuals with a legitimate need have access to the program(s) and are granted entry into the program(s). Talmudical Seminary Oholei Torah does not use email to send any private information in order to avoid the risks involved in doing so. Moreover, the office is locked with an activated alarm when no authorized personnel are inside; it is also under constant video surveillance.

Talmudical Seminary Oholei Torah utilizes reasonable steps to choose and maintain service providers that are capable of sustaining appropriate safeguards for its consumer information. Tzvi Rosenfeld regularly monitors the effectiveness of the safeguards' systems and procedures; and evaluates and adjusts its information security program in light of the results of the monitoring.

In order to protect private information, Yeshiva officials have received appropriate training regarding to the safeguards that they must use.