# **Definitions**

*These terms are defined by the* ***NCUA Part 748****.*

**Member**: An individual who has an established, ongoing relationship with True M’pact Solutions, LLC.

**Service provider**: A third party that maintains, processes, or otherwise is permitted access to member information while performing services for True M’pact Solutions, LLC.

**Member information**: Any record maintained by, or on behalf of, True M’pact Solutions, LLC that contains information regarding an individual who has an established, ongoing relationship with True M’pact Solutions, LLC. This includes records, data, files, or other information in paper, electronic, or other form that are maintained by, or on behalf of, any service provider on behalf of True M’pact Solutions, LLC.

**Member information system**: Any electronic or physical method used to access, collect, store, use, transmit, protect, or dispose of member information.

# **Overview**

This policy addresses the following topics:

* Risk Assessment
* Management and Control of Risk
* Member Information Security Controls
  + Critical Systems List
  + Records Management
  + Clean Desk Policy

**Purpose**

The purpose of this policy is to ensure that True M’pact Solutions, LLC complies with existing federal and state laws, and to ensure that information regarding members is kept secure and confidential.

## **Policy Detail**

It is the policy of True M’pact Solutions, LLC to protect the confidentiality, security, and integrity of each member’s non-public personal information in accordance with existing state and federal laws. True M’pact Solutions, LLC will establish and maintain appropriate standards relating to administrative, technical, and physical safeguards for member records and information.

True M’pact Solutions, LLC will maintain physical, electronic, and procedural safeguards, which comply with federal standards, to guard members’ non-public personal information.

True M’pact Solutions, LLC will not gather, collect, or maintain any information about its members that is not necessary to offer its products and services, to complete member transactions, or for other relevant business purposes.

True M’pact Solutions, LLC does not sell or provide any member information to third parties, including list services, telemarketing firms, or outside companies for independent use.

True M’pact Solutions, LLC’s Information Security Officer is responsible for annually reviewing the program, making any needed adjustments, and coordinating staff training. True M’pact Solutions, LLC Management is responsible for ensuring that its departments comply with the requirements of the program.

**Information Security Program**

Management is responsible for developing, implementing, and maintaining an effective information security program to:

* Ensure the security and confidentiality of member records and information
* Protect against any anticipated threats or hazards to the security or integrity of such records
* Protect against unauthorized access to, or use of, such records or information that would result in substantial harm or inconvenience to any member

**Risk Assessment**

True M’pact Solutions, LLC maintains a risk assessment that identifies potential threats to member information and evaluates the potential impact of the threats.

On an annual basis, the risk assessment is reviewed and updated by the Information Security Officer and True M’pact Solutions’s Management. True M’pact Solutions, LLC’s controls are then updated accordingly.

**Management and Control of Risk**

In order to manage and control the risks that have been identified, True M’pact Solutions will:

* Establish written procedures designed to implement, maintain, and enforce
* True M’pact Solutions, LLC’s information security program
* Limit access to True M’pact Solutions, LLC’s member information systems to authorized
* employees only
* Establish controls to prevent employees from providing member information to unauthorized individuals
* Limit access at True M’pact Solutions, LLC’s physical locations containing member information, such as building, computer facilities, and records storage facilities, to authorized individuals only
* Provide encryption of electronic member information including, but not limited to, information in transit or in storage on networks or systems to which unauthorized individuals may have access.
* Ensure that member information system modifications are consistent with
* True M’pact Solutions, LLC’s information security program
* Implement dual control procedures, segregation of duties, and employee background checks for employees with responsibilities for, or access to, member information
* Monitor True M’pact Solutions, LLC’s systems and procedures to detect actual and attempted
* attacks on, or intrusions into, the member information systems
* Establish response programs that specify actions to be taken when True M’pact Solutions, LLC suspects or detects that unauthorized individuals have gained access to member information systems, including appropriate reports to regulatory and law enforcement agencies
* Implement measures to protect against destruction, loss, or damage of member information due to environmental hazards, such as fire and water damage or technical failures
* Regularly test, monitor, evaluate, and adjust, as appropriate, the information security program in light of any relevant changes in technology, the sensitivity of member information, business arrangements, outsourcing arrangements, and internal or external threats to True M’pact Solutions, LLC’s information security systems

**Member information security controls**

True M’pact Solutions, LLC has established a series of member information security controls to manage the threats identified in the risk assessment. The controls fall into ten categories.

* **Critical systems list**

True M’pact Solutions, LLC will maintain a listing of its critical systems. This listing will support critical reliability functions, communications, services, and data. The identification of these systems is crucial for securing member information from vulnerabilities, performing impact analysis, and in preparing for unscheduled events that affect the operations of True M’pact Solutions, LLC.

* **Records management**

The industry wide general principles of records management apply to records in any format. True M’pact Solutions, LLC will adhere to policies and procedures for protecting critical records from all outside and unauthorized access. Access to sensitive data will be defined as to who can access which data and under what circumstances. The access will be logged to provide accountability.

* **Clean desk policy**

True M’pact Solutions, LLC employees will comply with the Clean Desk Policy. This policy was developed to protect sensitive data from being readily available to unauthorized individuals.