

# **Xerox HR Solutions**

## **Secure Document Handling and Destruction Procedures**

2012

A decorative graphic consisting of two overlapping, wavy, light blue bands that cross in the center, creating a darker blue intersection. The bands extend from the left and right edges of the page towards the bottom.

# Privacy Protection Statement



## Privacy Protection Statement

Xerox HR Solutions (Xerox) is committed to protecting and safeguarding your privacy. The purpose of this Privacy Protection Statement is to inform you about the types of personal information we might collect from you and how we use that personal information, and whether we disclose the personal information to anyone.

We collect, process, store, and maintain personal information as we determine reasonably necessary in order to perform Xerox HR Solutions business functions relating to the dependent eligibility verification. Personal information may include: your name, address, zip code; all dates related to an individual (e.g., birth date); account or card numbers identifying a specific individual's account (e.g., financial account to show proof of joint ownership); Tax ID and Social Security Number. For example, we use, in some instances copies of birth certificates or birth records to support your proof of parenthood for any dependent(s) who is participating in your employer's health care plans.

Xerox HR Solutions does not sell, trade, or lease personal information entrusted to us. To that end, Xerox takes reasonable precautions to allow access to your personal information to only those Xerox HR Solutions employees who have a legitimate business purpose for access. For example, the customer service representative who processes your personal information.

All personal information is encrypted using PGP (privacy and authentication program) both in rest and in transit, this includes: email and FTP documents. All information/data servers are in a locked server room and stored in a locked cabinet. All Xerox HR Solutions employees have a unique windows login requiring passwords that meet HIPAA Secure standards and require changing every 60 days.

Xerox HR Solutions complies with all applicable laws relating to the protection of personal information.

# Security Issues FAQ

**Who is conducting this verification process and how do I know my employee's personal information is safe?**

The verification is being conducted by XEROX HR Solutions (Xerox). Employee's information is treated as private and confidential. Administrative, physical and technological safeguards are adhered to throughout and after the dependent eligibility verification to ensure the confidentiality of personal information.

**What administrative procedures are in place to ensure the confidentiality of personal information?**

All XEROX HR Solutions employees are thoroughly trained in regulated compliance procedures (HIPAA, Gramm-Leach Bliley Act, etc.) for working with personal health information (PHI) and financial information.

**What physical safeguards are in place to ensure personal information is not compromised?**

Service center operations cannot be accessed by non-XEROX personnel and all XEROX employees operate under a "Clean Desk" policy. This means that at the end of each work shift, all work is off the desk and stored in a locked filing system.

**What technological safeguards are in place to protect electronic information?**

Only service center employees have computer access to personal electronic information. All XEROX HR Solutions computers automatically revert to password protection mode if no activity has occurred within fifteen minutes.

**What should I do to protect my documentation before I mail it?**

Before mailing, please review your documentation for any personal and financial information that you do not want to share with XEROX HR Solutions. We request that you mark out all financial information and the first five digits of all Social Security numbers. The rule of thumb is that we only need to see the information necessary to prove the dependent's relationship to the employee. As is pertains to financial information, **"When in doubt, mark it out!"**

**How is personal documentation handled after the verification process is over?**

XEROX HR Solutions adheres to HIPAA rules and regulations for the end-of-life disposal and destruction of confidential paper documents, forms and mailing envelopes. An independent, licensed document destruction service issues a certificate of destruction to XEROX HR Solutions on a monthly basis as an assurance of HIPAA compliant documentation destruction.

**What if I have questions regarding the safety of my personal information?**

XEROX HR Solutions will have a dedicated toll-free helpline to assist employees with any questions related to the verification process. Hours of operation are Monday through Friday between 8 a.m. and 8 p.m.; and Saturday between 9 a.m. and 2 p.m. Eastern time.

**How does the service center verify that I am the correct person calling in?**

All service center employees use a "Rule of Three" prior to discussing any information with the caller. The employee will be required to answer three questions to verify their identity. Employees are asked for their zip code, last four digits of Social Security number and the date-of-birth of spouse or dependent.

## Documentation Security

Our Audit and Recovery Practice operates out of Maumee, OH. All visitors are signed-in, escorted at all times, and prohibited from entering our Support Center area.

Support Center Area – Process Overview:

1. Mail is delivered to a secure, closed mail processing room directly from the U.S. Postal Service where all dependent eligibility parcels are logged, sorted into groups of fifty and batch coded for tracking purposes.
2. Received envelopes are immediately placed in a secure trash container for HIPAA compliant document destruction.
3. Batches are then “carrier” delivered to the secure document processing area located in the same facility. Batches are allocated to an experienced processor (again located in the same secure area) who evaluates and enters/scans the necessary information into our proprietary dependent eligibility software.
4. Upon completion of the batch, documents are retrieved by an internal “carrier”, recounted, logged as processed and filed into a client-specific, secure, locked filing cabinet.
5. All documents are securely stored for 14 days. At that time they are queued for HIPAA compliant document destruction unless other arrangements are requested by the client. All documents are scanned and attached to each employee’s electronic record.

# Documentation Destruction

Xerox follows HIPAA rules and regulations for the end-of-life disposal and destruction of confidential paper documents – documents where careless disposal could jeopardize a person's privacy such as documents that include Social Security numbers or financial information.

Documentation Destruction – Process Overview:

1. Once the client agreed upon storage period has expired, a nationally certified document destruction service is used to destroy confidential paper documents including forms and envelopes. Iron Mountain Secure Shredding service a National Association for Information Destruction (NAID) "AAA" Certified document destruction service.

All documents are first scanned and attached to each employee's electronic record before documentation destruction. All documents are placed in a locked container and picked up by an Iron Mountain employee on a weekly basis. Xerox employees do not have key access to this container.



The Iron Mountain Secure Shredding service is Triple A Certified by the National Association for Information Destruction, Inc. (NAID) and is the largest shredding vendor to achieve NAID certification. Iron Mountain is proud to have taken a leadership role in the development of NAID's standards, which focus on operational workflows and security.



Iron Mountain Secure Shredding complies with the Payment Card Industry (PCI) Data Security Standard and participates as a member of the PCI Security Standards Council.



745 Atlantic Avenue  
Boston, MA 02111  
800 899 IRON

[ironmountain.com](http://ironmountain.com)

**ABOUT IRON MOUNTAIN.** Iron Mountain Incorporated (NYSE: IRM) provides information management services that help organizations lower the costs, risks and inefficiencies of managing their physical and digital data. Founded in 1951, Iron Mountain manages billions of information assets, including backup and archival data, electronic records, document imaging, business records, secure shredding, and more, for organizations around the world. Visit the Company Web site at [www.ironmountain.com](http://www.ironmountain.com) for more information.

US-SS-BR-052510-002

---

© 2010 Iron Mountain Incorporated. All rights reserved. Iron Mountain, the design of the mountain, InControl, Digital Record Center, Stratify and SafeKeeper PLUS are registered trademarks; and Iron Mountain Connect, Image on Demand and ActivFile are trademarks of Iron Mountain Incorporated in the U.S. and other countries. All other trademarks are the property of their respective owners.