

CLEAN DESK POLICY

Background

It is generally accepted that a “clean” desk is a sign of efficiency and effectiveness; a neat desk also serves to keep customer and bank information secure. It is the intent of _____ Bank (“Bank”) to adopt a “clean desk” policy in order to:

- Ensure that customer and proprietary bank information is treated with the highest degree of security and confidentiality.
- Reduce the possibility of loss. (Re: the teller line)
- Convey a positive image to visitors to the bank.
- Minimize disorganization, reducing time searching for misplaced items.
- Reduce the possibility of workplace accidents.

Responsibilities

The primary responsibility for enforcement of this policy and its operating procedures rests with the Bank’s Privacy Officer. Senior Officers are responsible for ensuring that their departments implement and administer the directives of this policy. All employees must comply with the terms of this policy as they pertain to their specific job responsibilities.

Changes to this policy require approval by the Board of Directors of the Bank. Changes in operating procedures, standards, guidelines and technologies, provided they are consistent with this policy, may be authorized by the members of Senior Management. Such changes should be communicated to the Bank’s designated Privacy Officer.

General Requirements

Each employee is charged with:

- Maintaining a neat work environment during business hours.
 - Non-essential items should be stored away when not in use.
- Refraining from cluttering the work area with Post-It® or other handwritten notes displaying sensitive information such as user ID’s, passwords, account numbers, etc.
- In the teller area, removing cash, negotiable instruments, etc. from the work area as soon as practicable and placing them in designated secure areas.
- Putting away non-essential documents and items when hosting a visitor in the work area.
- Putting away documents or electronic media containing customer and proprietary bank information whenever an extended absence (i.e., lunchtime, break, committee meeting, etc.) from the work area is anticipated.

- *If time permits*, securing all important documents and electronic media in the event of an emergency evacuation (such as a fire alarm).
- Putting away all documents and electronic media at the end of the work day. Papers containing customer and bank proprietary information should be secured in locked drawers or cabinets. Similarly, any expensive equipment should be secured.

Tips

- Discard items with customer or proprietary internal information in designated secure shred bins.
- Promptly return any documents obtained from other departments when they are no longer needed.
- In the teller area, promptly sell excess cash to the vault.
- Remove customer or bank proprietary information from your desk top during any extended absence.
- Always clear your desktop before you go home, securing appropriate items.

Relationship to other Policies

Employees are advised to consult the bank's Microcomputer Policy for additional guidelines regarding the use and safeguarding of computer information and equipment.

Enforcement

Employees are expected to follow the spirit and intent of this policy. Periodic sweeps of work areas may be conducted by the Privacy Officer or his designee during non-bank hours to verify adherence to the policy. Violations will be brought to the attention of the respective supervisors for appropriate follow-up action.