



Transforming lives and communities through hope and quality mental health since 2007.

COUNSELING CONNECTIONS FOR CHANGE, INC **PERSONALLY IDENTIFIABLE INFORMATION (PII) PROTECTION POLICY**

Approved by: Dawn Lawless, LCSW-S, CEO

Applies To: All employees, contractors, interns, and volunteers

Purpose: This policy establishes how Counseling Connections for Change, Inc. collects, uses, stores, protects, and discloses Personally Identifiable Information (PII) to ensure compliance with applicable laws and to protect the privacy and trust of individuals we serve.

Definition: PII refers to any information that can be used to identify an individual, including but not limited to:

- Full names
- Home and email addresses
- Phone numbers
- Date of birth
- Social Security numbers, Driver's license or ID numbers
- Financial account information
- Biometric identifiers

Collection and Use: PII is collected for legitimate business purposes, including service delivery, administrative operations, and compliance. Individuals will be informed of the purpose for data collection and their consent will be obtained where required by law.

Storage and Security: The privacy of PII is prioritized, and protection protocols should adhere to the following:

- PII is stored in secured systems with access restricted to authorized personnel.
- Physical files are locked and access-controlled.
- Electronic PII is encrypted during storage and transmission.
- Multi-factor authentication and secure passwords are required for system access.

Disclosure: PII is not shared with third parties unless:

- Authorized by the individual
- Required by law or legal order
- Necessary for contracted services with proper data protection agreements in place

Breach Notification: In the event of a data breach:

- The incident will be investigated immediately by the Privacy Officer.
- Affected individuals and relevant authorities will be notified within the required legal timeframe
- Mitigation steps will be taken to prevent recurrence



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Employee Training: All staff receive mandatory training on PII handling, confidentiality practices, and breach protocols upon onboarding, and as necessary, thereafter.

Policy Violations: Violations of this policy may result in disciplinary action, up to and including termination, and potential legal consequences.

Contact: For questions or concerns, please contact the Privacy Officer at info@counselingconnections.org.