

Information Security Policies

Customer Privacy Management Policy

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PURPOSE

This policy establishes the minimum requirements for the implementation and maintenance of a customer data privacy program at BuildFire.

SCOPE

This policy applies to customers of BuildFire application development services. This policy applies to all employees and third-parties responsible for managing BuildFire systems.

POLICY

Privacy Policy Requirements

Data Privacy Policies – BuildFire will create and maintain written Data Privacy Policies that describe the ways in which sensitive customer information will be protected.

Distribution Of Privacy Policies - All BuildFire privacy policies that a prospect or a customer may need to know must be publicly posted or otherwise periodically distributed to these same people.

Collection Limitation

Private Data Collection - The collection of private data by BuildFire workers must be performed by lawful means, and only for a purpose related to the activities of BuildFire.

Data Quality

Incorrect Personal Information - Whenever BuildFire receives notice from customers that personal information held in its records is incorrect, it must promptly modify the information, or else append to the record an indication that this information is disputed and alleged to be incorrect.

Purpose Specification

Information Collection Notice - In every instance where personally-identifiable information (PII) is collected; an explicit and understandable notice must be provided at the time and place the information is collected. Where information which is not personally-identifiable is collected, notice about this collection must nonetheless appear in the posted privacy policy..

Use Limitation

Personal Information For Business Functioning - BuildFire must collect, process, store, and disseminate only that information that is necessary for the proper functioning of its business.

Third Party Transfer

Transferring Private Data - BuildFire must release private data only to third-party organizations that commit in writing to maintain the information with an adequate level of protection, as determined by the Information Security Manager.

Disclosure to Law Enforcement – BuildFire may be required to disclosure certain personal information by law or regulation or in the event of an investigation by law enforcement.

Disclosure Of Private Information To Outsourcing Organizations - BuildFire must not sell, rent, or otherwise transfer customer information to third parties in any manner unless the third parties sign a confidentiality agreement prohibiting them from further dissemination of this information and prohibiting them from using this information for unauthorized purposes..

Security Safeguards

Embedded Personal Information - BuildFire information systems must not employ secret serial numbers, secret personal identification numbers, or any other secret mechanisms that might reveal the identity of, or activities of customers.

Personal Identifiers On Publicly-Accessible Locations – Personally Identifiable Information (PII), such as social security numbers, must not appear on any publicly-accessible location managed by or controlled by BuildFire.

Account Number Intelligence - In an effort to protect customers against identity theft, BuildFire does not use externally-meaningful identifiers as its own internal customer account numbers. Thus, BuildFire customer account numbers must never be equivalent to social security numbers, driver's license numbers, or any other identifier which might be used in an unauthorized fashion by a third party.

Openness

Customer Access To Personal Information - Customers have a right to obtain confirmation from BuildFire that personal information (PII) about them is kept on BuildFire systems. The nature of the information kept and the uses to which this information is put will generally be provided. If this cannot be done, the reasons why BuildFire has denied this request will nonetheless be promptly provided.

Individual Participation

Private Information Collection Consent - BuildFire must obtain explicit consent from customers before it records any private information about them in a computerized information system.

Collecting Children's Information

Children's Personal Information Collection - Personal information about children must not be collected by any BuildFire information system without obtaining clear and unambiguous consent from the child's parents or guardians.

VIOLATIONS

Any violation of this policy may result in disciplinary action, up to and including termination of employment. BuildFire reserves the right to notify the appropriate law enforcement authorities of any unlawful activity and to cooperate in any investigation of such activity. BuildFire does not consider conduct in violation of this policy to be within an employee's or partner's course and scope of employment, or the direct consequence of the discharge of the employee's or partner's duties. Accordingly, to the extent permitted by law, BuildFire reserves the right not to defend or pay any damages awarded against employees or partners that result from violation of this policy.

DEFINITIONS

Confidential Information (Sensitive Information) – Any BuildFire information that is not publicly known and includes tangible and intangible information in all forms, such as information that is observed or orally delivered, or is in electronic form, or is written or in other tangible form. Confidential Information may include, but is not limited to, source code, product designs and plans, beta and benchmarking results, patent applications, production methods, product roadmaps, customer lists and information, prospect lists and information, promotional plans, competitive information, names, salaries, skills, positions, pre-public financial results, product costs, and pricing, and employee information and lists including organizational charts. Confidential Information also includes any confidential information received by BuildFire from a third party under a non-disclosure agreement.

Information Asset - Any BuildFire data in any form, and the equipment used to manage, process, or store BuildFire data, that is used in the course of executing business. This includes, but is not limited to, corporate, customer, and partner data.

Opt-Out Notice - Notification to customers that they may choose not to permit their information shared with nonaffiliated third parties.

Production Application – Production Applications are those applications created and maintained by BuildFire for their customers. These do not include third-party application such as Office 365.

Personally Identifiable Information (PII) – Information that alone, or when combined with other personal or identifying information can be used to uniquely identify, contact, or locate a single person or can be used with other sources to uniquely identify a single individual.

Third Party – Any non-employee of BuildFire who is contractually bound to provide some form of service to BuildFire.

User - Any BuildFire employee or partner who has been authorized to access any BuildFire electronic information resource.

REFERENCES

CPL: 16.2 Customer Privacy Management

ISO 27002: 18.1.4 Privacy and protection of personally identifiable information

APPROVAL AND REVISION HISTORY

Version	Description	Revision Date	Approved By:	Title
1.0	Initial Version	03/01/2017	Daniel Hindi	CTO