

CENTRAL YESHIVA TOMCHEI TMIMIM LUBAVITZ

INFORMATION SECURITY PROCEDURES

Central Yeshiva Tomchei Tmimim Lubavitz has designated Rabbi Sholom Brod as coordinator of the institution's information security program. The program was established to ensure that all consumer data – whether from students, parents or others with whom the Yeshiva has a customer relationship - is safeguarded. The program includes administrative, technical, and physical protection that the Yeshiva uses to access, collect, distribute, process, protect, store, use, transmit, dispose of, or otherwise handle customer information. The safeguards ensure the security and confidentiality of customer information; the protection against anticipated threats or danger to the safety or integrity of such information; and shields against unauthorized access to or use of such information that could result in damage or inconvenience to any customer.

Central Yeshiva Tomchei Tmimim Lubavitz has implemented the following precautions to protect private information: The computers and computer systems in the Yeshiva are password protected and are only accessible to school officials who require entry to the system(s) to fulfill their institutional roles. Each Yeshiva official has his/her own unique password. In addition to the computer password, there is a supplementary password for each program utilized by Central Yeshiva Tomchei Tmimim Lubavitz, ensuring that only individuals who have a legitimate need to access the program(s) are granted entry into the program(s). Central Yeshiva Tomchei Tmimim Lubavitz does not use email to send any private information in order to avoid the risks involved in doing so. Moreover, the office is locked when no authorized personnel are inside; it is also under constant video surveillance.

Central Yeshiva Tomchei Tmimim Lubavitz takes reasonable steps to choose and maintain service providers that are capable of sustaining appropriate safeguards for its consumer information. Rabbi Sholom Brod regularly monitors the effectiveness of the safeguards' systems and procedures; and evaluates and adjusts its information security program in light of the results of the monitoring.

Yeshiva officials have received training on the safeguards that they must use to protect private information.