

## INFORMATION ON THE SECURITY MEASURES ADOPTED FOR TREATMENT OF PERSONAL DATA OF MEMBERS

In conformity with the provisions of the Privacy Code (Legislative Decree of June 30, 2003, n. 196) the Fraternity of Communion and Liberation has adopted the following security measures for the treatment of personal data of members.

### **General organizational measures**

Those authorized to deal with the data have been identified in writing with a Letter of Appointment that enunciates the authorization profiles and the treatment allowed to each Appointed person, and establishes security rules to be observed in handling the data.

Those so appointed have received a handbook of practical rules with instructions for the treatment of personal data.

Both the Appointment Letter and the internal rules for treatment of personal data are subject to periodical revision.

### **General physical measures**

All the rooms where the data is handled are protected by the constant surveillance of personnel during office hours, and by suitable security systems.

### **Treatment with electronic instruments**

Access to databases used for the treatment of data is protected by passwords decided by each Appointed person, bound by secrecy. The Authorized persons are instructed to change the passwords every three months.

Appropriate, constantly updated programs protect the electronic instruments from risk of intrusion by pirate programs and from damage by computer viruses.

Procedures for daily database backup and storage of security copies have been adopted, and restoration of data and system availability in the case of malfunction has been guaranteed.

Specific rules have been adopted for the care and use of removable supports with personal data in their memory, and the destruction of unused supports, or erasure in such a way that the data stored in them cannot be reconstructed.

### **Treatment without the aid of electronic instruments**

All archives containing personal data are under controlled and selected access, entrusted to the care of specifically identified persons who keep them locked, except for the time necessary for treatment of the data.

Procedures have been adopted for safe-keeping of the keys of the archives and rooms.

### **Policy document on security**

A policy document on security has been written and is updated annually.