Best Privacy Practices: Handling Protected Information

Any information that can be used to trace an individual's identity can be considered protected information. EnhanceFitness instructors are responsible for small bits of information about participants that, when taken together, could be used by identity thieves as a wedge into a participant's personal life. The best 'rule' when handling the information you collect is to treat participant data as you would want someone else to treat your own personal information. Here are a few best practices to help you do that.

Examples of Protected Information
- Address, telephone number
- Date of birth
- Personal medical information
- Social security number (including just the last 4 digits)
- Photos or video
- Financial transactions
- Employment history
- ANY personal or private information that can be used to uniquely identify an individual

Your Roles and Responsibilities as a PATH Leader
- Take privacy protection seriously.
- Respect the privacy of others.
- Do not use photos or video of participants unless you have a signed consent form on file.
- Store completed forms in a locked cabinet when not in use.
- Use appropriate transfer, storage and disposal methods in place, as outlined below.

Transporting and Safeguarding Protected Information
When you hand-carry:
- Use a cover sheet to shield the contents.

When you use mail:
- Use manila or white envelopes.
- Mark the envelope to the attention of the authorized recipient.
- Never indicate on the outside of the envelope that it contains personal information.

When you use email:
- Password protect personal data placed on shared drives, the internet, or the intranet.
- Use encrypted email.
- Do NOT send personal information to a personal, home, or unencrypted email address.
- Announce in the opening line of the text (NOT the subject line) that 'for office use only' – FOUO – information is contained below.

Disposal of Protected Information

A disposal method is considered adequate when it renders the information unrecognizable, as with these methods:

- Burning
- Melting
- Chemically decomposing
- Pulping or pulverizing
- Shredding or mutilating
- Deguassing (erasing from a magnetic field or disc)
- Deleting and then emptying the recycle bin