YESHIVA SHAAREI TORAH

INFORMATION SECURITY PROCEDURES POLICY

Yeshiva Shaarei Torah has designated Mr. Menachem Frommell as coordinator of the institution's information security program. This program was established to ensure that all customer information, whether from students, parents, or other individuals with whom the school has a customer relationship, is safeguarded. The program includes administrative, technical, and physical safeguards that the school 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.

Yeshiva Shaarei Torah has implemented the following safeguards to protect private information: The computers and computer systems in Yeshiva Shaarei Torah are password protected and are only accessible to school officials who need access to the system(s) to fulfill their institutional roles. Each school official has his/her own unique password. In addition to the computer password, there is an additional password for each program utilized by Yeshiva Shaarei Torah. This ensures that only individuals who have a legitimate need to access the program(s) is granted entry into the program(s). Yeshiva Shaarei Torah does not use email to send any private information do avoid the risks involved in doing so. Additionally, the office is locked and alarmed when no authorized personnel are inside and is under video surveillance at all times. Yeshiva Shaarei Torah takes reasonable steps to choose and maintain service providers that are capable of sustaining appropriate safeguards for the customer information. Mr. Frommel 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.

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