

# PRIVACY AND SECURITY POLICY

Science-Informed Manual Therapy Education



WALT FRITZ'S PAIN RELIEF CENTER

# 1 Introduction

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## 1.1 Purpose

This Privacy and Security Policy ("Policy") applies to all activities of Walt Fritz's Pain Relief Center Seminars ("Fritz Seminars"). The Pain Relief Center provides comprehensive individualized treatment for the relief of pain and the return to a fully functional lifestyle. Utilizing a method called manual therapy to address problems that have not responded to previous surgeries, therapies, and medications, Pain Relief Center seeks to bring about positive and lasting changes. Walt Fritz is a licensed physical therapist who has dedicated himself to the continuing education of the physical therapy profession. Accordingly, this policy facilitates and establishes Fritz Seminars' compliance with the proper privacy and security protections of all participant data.

# 2 Privacy

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## 2.1 Computer Use and Cloud Storage

Fitz Seminars only uses personal computers and does not use public devices for work management. All computers must be password protected and only accessible to authorized personnel. Unattended computers must be locked by the user when not in use. All computers must have an automatic screen lock function set to activate upon fifteen (15) minutes of inactivity automatically, Antivirus software must be installed on all computers used for Fritz Seminars' purposes. Fritz Seminars retains all work products on Dropbox Business (provided by Dropbox, Inc.) servers.

### 2.1.1 Passwords and Wi-Fi

All devices must be password protected and only accessible by authorized personnel. Individual users shall have unique login IDs and passwords consistent with these policies. Login IDs and passwords shall be required to gain access to Fritz Seminars networks and computers. In order to minimize risks Fritz Seminars shall: (i) set strong passwords; (ii) use automatic log-off protocols when appropriate; (iii) lock the device when not using it; (iv) maintain control of and access to the device at all times; (v) refrain from sharing the device; (vi) install a firewall on the device; and (vii) use secure, nonpublic Wi-Fi connections when possible. Passwords shall meet certain minimum requirements, including:

∇/ Passwords must be changed every ninety (90) days.

A user cannot reuse their last twelve (12) passwords.

- ✓ Passwords must be at least eight (8) characters and contain an uppercase letter, a lowercase letter, a number, and a special character.

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- ✓ Commonly used words, names, initials, birthdays, or phone numbers should not be used as passwords.
- ✓ Passwords must not be disclosed.
- ✓ A password must be promptly changed if it is suspected of being or is known to have been disclosed.
- ✓ Passwords must not be written down, posted, or exposed.

## 22 Collected Information

All collected information is stored in Dropbox Business and accessed via personal, password-protected computers. Fritz Seminars is the only entity to access this collected information. Only information necessary to perform business operations is collected. This information includes but is not limited to, payment information when payment is received via a credit card or check, and demographics of therapists that have taken a seminar. Fritz Seminars utilizes Square (<https://squareup.com/>), which Fritz Seminars understands maintains its own security and privacy protocols. Fritz Seminars has no access greater than necessary to process payments to Square information.

## 23 Shared Information

Only authorized information may be shared. This includes information relating to therapist demographic information for those therapists that have taken the course and who allow sharing of information. No unauthorized payment or other personal information may be shared with anyone outside Fritz Seminars.

Fritz Seminars does not share or sell any data other than for payment or internal operational purposes.

# 3 Security

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## 3.1 Information Transport

No personal or confidential information shall be transported or shared. However, information that is authorized to be shared regarding demographics and other relevant information may be accessed via the website, [waltfritzseminars.com](http://waltfritzseminars.com).

## 3.2 Data Storage

All data is securely stored. This data includes demographics and payment information authorized to be collected. All data is stored in Dropbox Business and accessed via personal, password-protected computers.

### 3.2.1 Physical Data

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Fritz Seminars does not currently store physical data; however, it has proper procedures in place to store any collected physical data. All physical data shall be securely stored in a locked cabinet only accessible by authorized personnel. Physical security, when in place, shall be continuously analyzed to ensure proper safeguards of data protection.

### 3.3 Data Accuracy

Data is accurate at the time of collection, and any changes to the data shall be reflected as necessary. All of Fritz Seminars' data shall be dependable and accurate and reassessed periodically to ensure accuracy.

## 4 Administration

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### 4.1 Change in Administration

Any changes in data and privacy storage and collection shall be reflected in this policy. All changes will continually promote compliance with proper handling of data and privacy as relevant to the physical therapy education field.

### 4.2 Continued Monitoring

Fritz Seminars shall stay in compliance with this policy to facilitate continuous monitoring regarding the privacy and security of participants' records. Fritz Seminars shall, in conjunction with outside agencies, continuously monitor the business to ensure compliance with this policy.

### 4.3 Mitigation

Fritz Seminars actively mitigates, to the extent practicable, any harmful effect that is known to it and arises from some violation of its data storage policy. Fritz Seminars actively works to ensure proper privacy and security of protected data.

Place Requirement 4 responses that could not be inserted following the item(s) after this page and before the Requirement 5 responses. Be sure to label attachments with the responses number.