



## Security, Privacy and Confidentiality Policy

As a testament to OnTarget CPA's commitment to safeguard our client's personal data, and consistent with our legal and professional obligations, we have developed this Security, Privacy and Confidentiality Policy. OnTarget invests heavily in its network security and IT strategy, which is essential to keeping data safeguarded at the highest level.

### I. Data and Systems Security

OnTarget CPA maintains a professional services contract with Reciprocal Technologies to implement and maintain the firm's IT infrastructure, including its security measures. Reciprocal Technologies is responsible for OnTarget CPA's hardware and software and serves as its Virtual Chief Information Officer. Contractual oversight and security measures include:

- System administration roles; including provisioning, configuring, monitoring, managing, reporting, and supporting software.
- Provide a software suite for PCs, servers and mobile devices to include backup, anti-virus, web protection, patch management and automated tune-ups. This is monitored 24/7/365.
- Inventory and manage desktop and workstation assets, track warranties, service contracts.
- Monitor all systems for spyware, adware and viruses.
- Extensive investment has been made in OnTarget CPA's network security utilizing the most advanced offerings from Cisco, coupled with monitoring and management through Reciprocal Technologies, our network is impenetrable.
- Two-factor authentication is required to access any of the OnTarget CPA systems.

### II. OnTarget CPA Staff Responsibilities

#### Confidentiality

Confidentiality of client information is essential and is a cornerstone of trust and integrity in the accounting profession. To maintain the level of trust our clients place in OnTarget CPA, it is imperative that staff members treat client information with the highest degree of confidentiality.

- It is an employee's duty and responsibility to safeguard all Confidential Information. Confidential Information includes information of any sort that is related to OnTarget CPA's current or potential business clients and is not generally or publicly known.

- Employees will only use Confidential Information as necessary and only in connection with the performance of his or her job duties. Client issues shall never be discussed with anyone outside of the OnTarget CPA staff, and special care should be taken to never provide Confidential Information to employees or family members of clients. Only by instruction of the President, or by express permission of the client, may employees discuss bookkeeping, payroll, tax returns, or any other information with an individual designated by the client.

#### **Documents via email**

- To the extent possible, documents shall be sent in pdf format as attachments.
- Confidential documents must be sent securely via Microsoft's Information Protection systems. This is done in Outlook in the permission settings when an email is sent.
- Every email sent from the OnTarget CPA office includes the confidentiality notice below

#### **CONFIDENTIALITY NOTICE:**

*This E-mail and any attachments are confidential and may be protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of this E-mail or any attachment is prohibited. If you have received this E-mail in error, please notify us immediately by returning it to the sender and delete this copy from your system. Thank you.*

### **III. Privacy Policy**

OnTarget CPA's Privacy Policy, adopted from the AICPA, is provided to every client and accompanies their completed tax return.

#### **PRIVACY POLICY**

CPAs, like all providers of personal financial services, are now required by law to inform their clients of their policies regarding privacy of client information. CPAs have been and continue to be bound by professional standards of confidentiality that are even more stringent than those required by law. Therefore, we have always protected your right to privacy.

#### **TYPES OF NONPUBLIC PERSONAL INFORMATION WE COLLECT**

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization.

#### **PARTIES TO WHOM WE DISCLOSE INFORMATION**

For current and former clients, we do not disclose any nonpublic personal information obtained in the course of our practice except as required or permitted by law. Permitted disclosures include, for instance, providing information to our employees and, in limited situations, to unrelated third parties who need to know that information to assist us in providing services to you. In all such situations, we stress the confidential nature of information being shared.

#### **PROTECTING THE CONFIDENTIALITY AND SECURITY OF CURRENT AND FORMER CLIENTS' INFORMATION**

We retain records relating to professional services that we provide so that we are better able to assist you with your professional needs and, in some cases, to comply with professional guidelines. In order to guard your nonpublic personal information, we maintain physical, electronic, and procedural safeguards that comply with our professional standards.

Please call if you have any questions, because your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.