

**FRESNO COUNTY EMPLOYEES' RETIREMENT ASSOCIATION (FCERA)
DATA SECURITY POLICY**

I. PURPOSE

The Board of Retirement (Board) of the Fresno County Employees' Retirement Association (FCERA) adopts this policy to establish guidelines and procedures for the security of confidential member data, whether printed or electronic.

The Board and all FCERA employees are required to comply with the policies and procedures set forth in this document.

II. POLICY

1) Accessing Data

- a) Access to member data is limited to authorized FCERA staff.
- b) Modification of member data may only be done by authorized FCERA staff.
- c) Granting and removing system access will be initiated by authorized FCERA managers.
- d) Any data extracted will be limited, secure, temporary, and by authorized FCERA staff.

2) Sharing Data

- a) At times member data that contains Personally Identifiable Information (PII) must be extracted and shared. Some examples are: actuarial valuations, yearly audits, death audits, disability retirement applications and medical records, and state and federal reporting, election address listings and authorized Public Records Act requests. Secure procedures are in place for all these processes that include password security, data encryption and/or secure file transfer protocol (SFTP). Excluding these required functions, PII member data will not be transported off FCERA premises. PII member data is considered to be any data that includes SSN, birth date, name, address, or account number.
- b) All staff shall follow a "Clear Screen" protocol by locking their computers when leaving their desk and logging off when leaving for an extended period to reduce the risk of information theft, fraud, or security breach caused by information being left unattended and visible in plain view.

3) Storing Data

- a) All electronic member data will reside in the Arrivos databases hosted by RackSpace or in the Fresno County secure servers.

- b) Extracted Member data will only be stored on the Fresno County network drives. Temporary storage on desktop PCs should be cleared daily or at the end of the project/assignment.
 - c) The use of removable media such as USB drive and CD-R is limited to authorized FCERA staff and shall be logged.
 - d) Electronic and paper data files will be maintained only as long as needed, in compliance with FCERA's record retention schedules, to minimize the potential for unauthorized access.
- 4) Access to Building
- a) The Executive Assistant will maintain a list of existing authorized personnel that has access to FCERA's facility.
 - b) With an approval of the Retirement Administrator or designee, the Executive Assistant and/or Business Systems Analyst will request access for new personnel.
 - c) With an approval of the Retirement Administrator or designee, the Executive Assistant and/or Business Systems Analyst will request an access removal for terminated personnel.
- 5) Electronic Portable Devices
- a) Refer to FCERA Portable Electronic Device Policy.
- 6) Annual Security Audit
- a) Authorized FCERA staff will perform an annual security audit by June to ensure user's access is up to date on all systems at least once each fiscal year. This audit will include all FCERA information systems such as Arrivos, OnBase and NAV.
 - b) Will request and review SOC 1, 2, and 3 reports from all vendors that host FCERA data on an annual basis in June. Authorized FCERA staff will review the reports and verify that key controls are in place at the locations, including but not limited to cybersecurity infrastructure, physical and logical security controls, and complementary user entity controls.
 - c) Maintain all data, documentation, and communications produced during the review for audit documentation purposes.

III. Policy Review

- 1) The Board shall review this policy at least every three years.
- 2) This policy was initially adopted on October 21, 2015

- 3) This policy was reviewed and amended by the Board on October 3, 2018 and October 6, 2021

IV. Secretary's Certificate

I, Donald Kendig, the duly appointed Secretary of the Fresno County Employees' Retirement Association, hereby certify the adoption of this Policy.

October 6, 2021

Date of Action:



By: Retirement Administrator