

Compliance Advisory 01-2013

Clean Desk Policy

The purpose for this policy is to maintain compliance with the Safeguarding Customer Information provisions of the Gramm-Leach Bliley Act and to establish a culture of security and trust for all employees at Equity Loans LLC ("EQL"). An effective clean desk effort involving the participation and support of all EQL employees can greatly protect paper documents that contain sensitive information about our clients, customers and vendors. All employees should familiarize themselves with this policy.

A lot of information in our company is confidential and needs to be protected from unauthorized access by internal or external parties. The application of a clean desk policy reduces this risk compared to an environment without such a policy.

The main reasons for a clean desk policy are:

- Improve protection and confidentiality of private data.
- Reduce the threat of a security incident as confidential information will be locked away when unattended.
- Sensitive documents left in the open can be stolen by a malicious entity.

All staff at EQL are subject to this policy and must comply with this policy as it pertains to their specific job responsibilities.

Employee Responsibility:

- A. When you temporarily leave your desk - You will regularly leave your desk to attend meetings or to take breaks. In this case you should make a quick check if there is sensitive information on your desk. Sensitive documents, including all originals bearing a customer's signature, must be placed in a drawer out of sight or locked in your desk/filing cabinet.
- B. At the end of the working day – When you leave your desk in the evening all documents containing sensitive information as well as all originals must be locked in your desk/filing cabinet.

Managers Responsibility:

- A. All managers are required to "sweep" their employee's work areas nightly to ensure compliance with this policy. Upon finding an employee has not complied with the terms of this policy they are to report the violation to the Compliance Department, compliance@equityloans.com, and the Human Resources Department, hr@equityloans.com.

For Questions, Contact the Compliance Department at: compliance@equityloans.com.

Any employee found to have violated this policy will be provided a warning notice which will become a permanent record in the employee's Human Resources file. Receipt of a third warning notice for violation of this policy will be automatic grounds for termination of employment.

For additional information, please see EQL's Policies & Procedures/Compliance/Right to Financial Privacy Section on the Resource Center.