

COMPLIANCE

CLEAN DESK POLICY

This document is addressed to:

All Authorized Individual or Incorporated Brokers doing business under Optimal Financial Centre Inc.

JANUARY 2018

Clean Desk Policy

Overview

To improve the security and confidentiality of information, Optimal Financial Centre Inc. has adopted a Clean Desk Policy for computer and printer workstations.

This ensures that all sensitive and confidential information, whether it is on paper, a storage device, or a hardware device, is properly locked away or disposed of when a workstation is not in use. This policy will reduce the risk of unauthorized access, loss of, and damage to information during and outside of normal business hours or when workstations are left unattended.

A Clean Desk Policy is an important security and privacy control and necessary for compliance.

Scope

This policy applies to all Authorized Independent Brokers and all staff working at Optimal Financial Centre.

Policy

Whenever a desk is unoccupied for an extended period of time the following will apply:

- 1. All sensitive and confidential paperwork must be removed from the desk and locked in a drawer or filing cabinet. This includes mass storage devices such as CDs, DVDs, and USB drives.
- 2. All waste paper, which contains sensitive or confidential information, must be placed in the designated confidential waste bins.
 - * Under no circumstances should this information be placed in regular waste paper bins.
- 3. Computer workstations must be locked when the desk is unoccupied and completely shut down at the end of the workday.
- 4. Laptops, tablets, and other hardware devices must be removed from the desk and locked in a drawer or filing cabinet.
- 5. Keys for accessing drawers or filing cabinets should not be left unattended at a desk.
- 6. Printers and fax machines should be treated with the same care under this policy:
 - a. Any print jobs containing sensitive and confidential paperwork should be retrieved immediately. When possible, the "Locked Print" functionality should be used.
 - b. All paperwork left over at the end of the workday will be properly disposed of.

Compliance

This policy will be officially monitored for compliance by the director of sales and may include random and scheduled inspections.