

OBJECTIVE

Thomson Reuters is committed to protecting the privacy of individuals whenever appropriate. Thomson Reuters also has a legal obligation to protect certain types of data, including but not limited to Social Security Numbers. Social Security Numbers are unique nine digit numbers issued to individuals in the United States by the US Government. This policy addresses Thomson Reuters obligation to comply with various state and federal laws, rules, and regulations.

The purpose of this policy is to:

- (i) Protect the confidentiality of Social Security Numbers obtained in the ordinary course of company business;
- (ii) Prohibit unlawful disclosure of Social Security Numbers;
- (iii) Limit who has access to information or documents that contain Social Security Numbers;
- (iv) Describe how to properly dispose of documents that contain Social Security Numbers; and
- (v) Establish penalties for violations of this policy.

INTENDED AUDIENCE

This policy applies to all company businesses. This policy is in addition to and designed to supplement other company policies.

COLLECTION, USE AND DISCLOSURE

You should only collect, use and disclose Social Security Numbers for legitimate business reasons consistent with this policy, such as:

- Pre-employment background check of company job applicants;
- Verification of eligibility for company employment;
- Company tax reporting;
- New company hire reporting;
- Enrollment or administration of company employee benefit plans;
- Credit check of company customers; and
- Inclusion in company products and services provided that those products and services meet all legal requirements for collection, storage, and distribution of such information.

HANDLING

The following activities with regard to Social Security Numbers are expressly prohibited:

Mailings to an Individual Containing His/Her Social Security Number

You must not send any document in the mail to an individual if the document contains that individual's Social Security Number, unless the inclusion of the Social Security Number on the document is required by law.

Mailings or Fax Transmissions to Any Other Recipient

You must not send any document in the mail or via fax transmission to any other recipient (i.e., other than the individual to whom the Social Security Number belongs, as addressed in A) if the document contains more than four sequential digits of a Social Security Number, unless expressly allowed or required by law or the mailing or transmission is:

- Part of a company product or service, provided that the mailing or transmission meets all applicable legal requirements;
- Expressly requested by the individual whose Social Security Number appears in the mailed document; or
- Sent in connection with an ongoing administrative use in the ordinary course of business in order to:
 - Process an application or form initiated by the individual;
 - Establish, service, or terminate an individual's employment or account with the company;
 - Confirm the accuracy of a Social Security Number or the entitlement of an individual who is employed by the company or has an account with the company;
 - Verify an individual's identity, identify or authenticate an individual, or accomplish another similar administrative purpose related to an existing or proposed employment, account, transaction, product or service;
 - Investigate an individual's claim, credit, criminal, or driving history or for employment background screening purposes;
 - Detect, prevent, or deter identity theft or another crime;
 - Lawfully pursue or enforce the company's legal rights;
 - Comply with a law, or court or government order; or
 - Provide, administer or contract for employee health and welfare benefits, claims, or retirement programs or to administer the ownership of shares of stock or other investments.

If documents with more than four sequential digits of a Social Security Number are sent through the mail, the number must not be visible from the outside of the envelope or package. If documents with more than four sequential digits of a Social Security Number are sent via fax, the number must be beneath a cover sheet with a reasonable confidentiality legend.

Public Display

You must not publicly post or display more than four sequential digits (three in New Jersey) on documents or materials designed for public view (for example, employee rosters, bulletin boards, or computer screens in public view).

Display on Cards, Badges, Licenses, etc.

You must not require any person to visibly display more than four sequential digits of a Social Security Number on any documentation that employees or others may be required to carry or display (for example, identification cards, badges, time cards, permits, licenses);

Identification Numbers

You must not use more than four sequential digits as an employee or customer identification number, including a website or phone system user identification number (for example, login name or password), provided, however, that a full or partial Social Security Number may be collected in addition to the employee/customer identification number if needed to authenticate the individual or provide access to the individual's account or human resources information;

Account Numbers

You must not use more than four sequential digits as a primary account number for an individual;

Internet Transmissions

You must not require an individual to transmit more than four sequential digits of his or her Social Security Number over the Internet or other computer system or network, unless the connection is secure or the transmission is encrypted; and

Other Activities

Other activities may be prohibited if they are contrary to the law in any controlling jurisdiction. It is your responsibility to seek clarification and guidance in case of any questions about the proper use of Social Security Numbers. You may contact the legal department with any questions or issues you may have.

STORAGE

You must store all documents containing Social Security Numbers in a secure manner. Social Security Numbers may not be stored on computing devices or media that exist outside of a secure data center facility. "Computing devices" include, but are not limited to:

- Portable devices (laptops, Blackberries, PDAs, etc.)
- Removable media (USB "thumb" drives, CD-ROMs, etc.)
- Desktop computers

This policy also covers storage of Social Security Numbers in e-mails or e-mail attachments saved to personal Outlook folders (“pst” files). E-mails that contain Social Security Numbers may only be saved to personal folders that exist on servers within a secure data center facility.

ACCESS

If you use documents (including electronic and print records) containing Social Security Numbers for any purpose, you must limit access to those documents. In particular, you may only disclose documents containing Social Security Numbers to:

- Individuals within the company who have a business need to know the Social Security Numbers (including, for example, individuals in the human resources and finance departments and the information technology professionals who support the human resources and finance infrastructure);
- Third parties who process the Social Security Numbers on the company’s behalf, such as payroll processors, benefits providers, or company contractors who need access to the Social Security Numbers in order to provide their services, provided that these third parties have a contractual or legal duty to protect the Social Security Numbers;
- Third parties who provide legal, accounting and other advisory services to the company, provided that these third parties have a contractual or legal duty to protect the Social Security Numbers;
- Government agencies, for required reporting purposes;
- The individual to whom the Social Security Number pertains, or the individual who provided the Social Security Number to the company (such as to an employee who has provided family-member Social Security Numbers for benefits purposes);
- Third parties who are qualified commercial, professional or government agency customers of the company, when the Social Security Number is contained in company products that the customers are authorized to receive in accordance with law and the product terms; and
- Any person, if the company is required by law to make the disclosure (such as in response to subpoenas or court orders) or if the individual to whom the Social Security Number pertains consents to the disclosure.

When you provide Social Security Numbers to third parties, you must make sure adequate protective measures are in place to protect the confidentiality and integrity of the data. If you use documents containing Social Security Numbers, you must take appropriate steps to secure those documents.

DISPOSAL

You should retain documents containing Social Security Numbers in accordance with applicable document retention policies and practices and as required by law. When you are allowed to dispose of media containing Social Security Numbers, you should do so securely and safely by incineration, shredding, or by irretrievable erasure from computer media.

INCIDENT REPORTING

You must report any known or suspected Security Breach (accidental or otherwise) immediately to the Thomson Reuters Corporate IT Security Department at infosec@thomsonreuters.com for appropriate investigation and handling.

For purposes of this Policy, "Security Breach" means any incident that compromises the security, confidentiality, or integrity of (i) any Social Security Number or (ii) any system or document containing a Social Security Number.

DISCIPLINARY ACTIONS

Because of the sensitivity of Social Security Numbers, the possible harm that could come to individuals from exposure of Social Security Numbers, and the possible legal and reputational consequences for the company if Social Security Numbers are misused, any employee who knowingly obtains, uses or discloses Social Security Numbers for unlawful purposes or contrary to the requirements of this policy is subject to discipline up to and including discharge and/or legal proceedings.