

Philadelphia Regional Port Authority (PhilaPort) Employee SMS Messaging Originator Opt-In Data and Consent Policy

Effective Date: February 2025

1. Purpose This policy outlines the procedures for obtaining and managing opt-in data and consent from employees who wish to receive SMS messages from Philadelphia Port Authority. It ensures compliance with relevant laws and regulations, protecting the privacy and rights of individuals.

2. Scope This policy applies to all employees involved in the collection, storage, and use of opt-in data for SMS messaging.

3. Definitions

- **Opt-In:** The process by which an individual explicitly agrees to receive SMS messages.
- **Consent:** A clear, affirmative action indicating the individual's agreement to receive SMS messages.

4. Opt-In Process

- **4.1. Clear Communication:** Provide clear and concise information about the SMS messaging service, including the purpose, frequency, and types of messages. All messages will be to employees only and business related only.
- **4.2. Explicit Consent:** Obtain explicit consent from individuals before sending any SMS messages. This can be done through a web form, SMS keyword, or other verifiable methods.
- **4.3. Double Opt-In:** Implement a double opt-in process where individuals confirm their consent by responding to an initial opt-in message.

5. Data Collection and Storage

- **5.1. Minimal Data Collection:** Collect only the necessary data required for the SMS messaging service, such as phone numbers and consent records.
- **5.2. Secure Storage:** Store opt-in data securely using encryption and access controls to prevent unauthorized access.
- **5.3. Data Retention:** Retain opt-in data only as long as necessary for the purpose of the SMS messaging service and in compliance with applicable laws.

6. Consent Management

- **6.1. Consent Records:** Maintain accurate records of consent, including the date, time, and method of opt-in.

- **6.2. Opt-Out Mechanism:** Provide an easy and clear opt-out mechanism for individuals to withdraw their consent at any time.
- **6.3. Regular Audits:** Conduct regular audits to ensure compliance with this policy and address any issues promptly.

7. Compliance and Enforcement

- **7.1. Legal Compliance:** Ensure all SMS messaging activities comply with relevant laws and regulations, such as the Telephone Consumer Protection Act (TCPA) and General Data Protection Regulation (GDPR).
- **7.2. Training:** Provide training to employees on this policy and the importance of obtaining and managing consent.
- **7.3. Disciplinary Actions:** Implement disciplinary actions for non-compliance with this policy, up to and including termination of employment.

8. Policy Review This policy will be reviewed annually and updated as necessary to ensure continued compliance with legal requirements and best practices.