

Applies to: Faculty (including part-time and visiting faculty), staff and students (including graduate/undergraduate student workers and graduate assistants) employed by the University This policy continues to apply to individuals on sabbatical, other leaves or while visiting other institutions

1. Policy:

Issued: August 2023
Last Revised: August 2023
Last Reviewed: September 2024

2. Policy Purpose:

The purpose of this policy is to comply with the Gramm-Leach-Bliley Act (GLBA) and protect the privacy of personally identifiable information (PII) collected from students, employees, and other individuals associated with the University.

3. Scope and Application:

This policy applies to all employees, contractors, and vendors who have access to PII collected by the University.

4. Definitions:

Definitions	
PII	Personally Identifiable Information

5. Policy Details:

Collection and Use of PII:

The University only collects PII that is necessary for conducting its educational and administrative activities. The University will not sell, trade, or rent any PII to third parties.

Protection of PII:

The University takes reasonable measures to protect PII from unauthorized access, disclosure, or misuse. This includes physical, administrative, and technical safeguards, such as:

Restricting access to PII to authorized personnel. This is done by access control permissions.

Implementing secure storage and disposal procedures for PII. The data is behind file walls and accessed via access control.

Regular risk assessments and security audits are conducted quarterly. All systems are monitored by the NextGen cybersecurity tool Crowd strike, which alerts us immediately to any possible and potential issues.

Providing training and awareness to employees, contractors, and vendors regarding PII protection and GLBA compliance, via the cybersecurity awareness training program, KnowBe4.

Disclosure of PII:

The University may disclose PII to third parties, such as government agencies or service providers, only for the purpose of fulfilling its educational and administrative activities. The University will enter into written agreements with third parties that include provisions for safeguarding PII and complying with GLBA.

Compliance and Monitoring:

The University GLBA Compliance Officer, the CIO oversees the implementation and enforcement of this policy. The Compliance Officer conducts periodic reviews and assessments of the University's PII protection measures, and report any violations or breaches to the appropriate authorities.

Notification of Breaches:

In the event of a breach of PII, the University will notify affected individuals and regulatory authorities in accordance with applicable laws and regulations.

Recordkeeping:

The University maintain records of its GLBA compliance efforts, including policies and procedures, risk assessments, training materials, and security audits.

Enforcement:

Any employee, contractor, or vendor who violates this policy may be subject to disciplinary action, up to and including termination of employment or termination of contract.

Conclusion

This GLBA policy is designed to protect the privacy of PII collected by the University and ensure compliance with applicable laws and regulations. The University is committed to maintaining the highest standards of PII protection and will regularly review and update this policy as necessary.

6. Procedures:

Procedures
See department SOP's

7. Forms:

Forms
n/a

8. Responsibilities:

Position or Office	Responsibilities
All offices	Protect PII

9. Related Information:

Related Policies
Privacy Policy

10. Contacts:

Division/ Department	Position or Office	Contact Information
Information Technology	CIO	603-897-8630 / itsupport@rivier.edu