

# Seattle University Data Privacy Policy

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Last updated: July 1, 2011

## **Definitions**

The data privacy policy is based on a tiered definition of confidential information; these definitions are intended to facilitate compliance with privacy laws and are consistent with widely used terminology.

**Confidential information (“CI”)** is the most comprehensive category and covers all **non-public information** about Seattle University and its stakeholders, including employees, students, and donors. The university assumes that all employees have access to some form of



CI: Seattle University confidential (non

### **Off-Site Considerations**

PD: The university discourages employees from removing personal data and high-risk confidential information from campus. When it is required, employees are expected to protect that data like they would their own identity, credit cards, or check book.

### **Credit Cards**

HRI: Use of a credit card or payment card may create high-risk confidential information; those records must be protected in accordance with this policy.

### **Recording Information about the Activities of Individuals**

CI: Any department that maintains logs or automatically generated records of actions of individuals must adopt written policies, approved by the CIO, on the purpose of, and retention, access, and destruction policies for, such logs and records.

### **Surveys**

PD: Seattle University does not collect personal data in surveys unless it is essential to the purpose of the study and the benefits of the study are sufficient to merit such collection. Surveys that do collect personal data must receive informed consent from survey recipients to voluntarily provide such information. The resulting data must be managed in such a way that it meets the data privacy standards of the university.

### **Contracts with Vendors**

CI: Seattle University vendors dealing with Seattle University confidential information, whether or not they obtain the data directly from Seattle University, must have a written contract covering their services including the proper contract riders requiring the protection of Seattle University information. Departments should be aware that contracts may also require that the university protect the confidential information of vendors.

HRI: Departments that wish to contract with a vendor to collect or work with high-risk confidential information must obtain prior approval from the CIO.

### **Reporting Security Breaches**

CI: If it becomes known or suspected that Seattle University confidential information may have been acquired or used by an unauthorized person or for an unauthorized purpose, the matter should be immediately reported to the Office of University Counsel. Should University Counsel not be available, the CIO or Public Safety (open 24 hours a day) can be contacted instead. Members of the university are encouraged to contact University Counsel if unclear about whether the situation warrants such a report.

### **Compliance**

Upon employment and annually thereafter, all employees, including student employees, must demonstrate that they understand this policy and certify that they comply with it. In addition to the potential penalties outlined in the information policy framework, employees who fail to do so will have their user login revoked.