I. Policy Statement
All University divisions and constituent organizational support units will work to ensure that information privacy and confidentiality is preserved throughout their procedures and information systems. Where appropriate, information privacy and confidentiality will be mandated further by policy and/or enforced contractually.

II. Reason for Policy
This policy establishes the principles to guide the practices of divisions and units in protecting the privacy and confidentiality of the information entrusted to us. This policy also helps to fulfill the requirements of federal and state information security regulations; specific examples of these can be found in Section V.

III. Entities Affected By This Policy
This policy impacts all units of the University, and is specifically enacted by data stewards, department heads, and other responsible parties.

IV. Website Address for this Policy
http://matrix.scranton.edu/pir/policies.shtml

V. Related Documents, Forms, and Tools
Information Classification & Protection Policy; Information Access Policy:
http://matrix.scranton.edu/pir/policies.shtml
Records Management and Retention Policy:
http://matrix.scranton.edu/Governance/university-policies%20.shtml
Computer Security Incident Response Team Operational Standards Manual:

Revised March 2012
Related Required Disclosure Statements

Student Rights & Confidentiality of Information Statement (FERPA):  
http://catalog.scranton.edu/content.php?catoid=6&navoid=109&print#Academic_Policies_and_Regulations

Health Insurance Portability and Accountability Act (HIPAA) Privacy Policy:  
http://www.scranton.edu/humanresources/hipaa_privacy_policy.doc

Weinberg Memorial Library Borrowing and Lending Policies Confidentiality Statement (PA Act 90)  
http://www.scranton.edu/academics/wml/about/policies/borrowing-lending.shtml

Finance Division Information Security Policy (GLBA) – in development for Treasurer’s web page  
Information Resources Privacy & Confidentiality Statement – in development  
Website Tracking Disclosure Statement – in development

VI. Contacts

For policy clarification and interpretation, or consulting on maintaining the privacy and confidentiality of information, please contact the Information Security Office at 570-941-4226 or email security@scranton.edu

For information on privacy and confidentiality legal requirements, or consulting on the interpretation of federal and state regulations, contact the General Counsel’s Office at 570-941-6213.

VII. Definitions

Privacy is the state in which only intended recipients can access information

Confidentiality is the preservation of the privacy of information entrusted with confidences

VIII. Responsibilities

Employees, as data custodians, are expected to handle all information in a manner consistent with the Information Classification & Protection Policy, the controls prescribed by data stewards, and in a manner consistent with the following guiding principles for protecting privacy and confidentiality.
IX. Procedures - Guiding Principles
At all times, employee collection of, access to, and care of electronic information shall be guided by the following principles:

**Accountability:** Information systems should be architected in such a way that all data access is attributable to the responsible party.

**Availability:** Information systems should be architected to support continuity of operations to the extent possible.

**Disclosure:** Users will be notified if their personally identifiable information is being collected and informed of their rights.

**Integrity:** Information systems should be architected in such a way that data cannot be modified without authorization.

**Legitimate Educational Interest:** Access to information shall be restricted to those individuals having legitimate educational interest.

**Limited Scope:** Information should only be used for the stated purposes for which it was collected.

**Minimization:** Only the essential information should be collected that is necessary for enabling a business process.

**Nondisclosure:** Information shall not be further shared or released to third parties outside the University and contracted business partners without prior consent unless compelled to do so by law.

**Retention:** Data should only be retained for the period specified in the University Records Management and Retention Policy and Records Retention Schedule, for the duration of the business process that it enables, or as required by law.

X. Appendix – None