Privacy Awareness Training

The Office of Ethics, Compliance and Privacy
Dorinda Tucker, Associate Vice President
What is Privacy?
The use and governance of personal data

Institutional Privacy
Throughout the performance of university operations, the university will safeguard the generation, collection, use, storage, disposal, and disclosure of personal information in accordance with best practices and as required by applicable laws and regulations.

Individual Privacy
You as the individual (data subject) should decide how your data should be used.

Context is critical to privacy.
(As an individual)

Freedom from interference or intrusion.
(As an individual)
Interdependent Business Functions

Privacy
The what?

Compliance
How do you know?

Security
The how?
Privacy and Data Protection

Why is it important?

• Establishes **trust** in our individual interactions

• Builds our **reputation** as an organization which values and safeguards information

• Prevents Harm:
  • Information Sharing
  • Intrusions/Breaches

• Legal and Contractual Compliance
Who is Responsible for Data Protection?

The GW Community

- Vendors
- Staff
- Partners
- Faculty
- Students

All of Us
Evolving Privacy Regulatory Landscape

**FERPA**
Privacy protection of students in the U.S:

- Education records:
  - Files
  - Emails
  - Documents
  - Any information related to student.

**GDPR**
Privacy protection of EU citizens:

- Displaying lawful basis for processing (consent)
- Right to be forgotten
- Records of processing activities, accountability.

**HIPAA**
Privacy protection of the health information of U.S. citizens/residents:

- Set rules for use and release of health information and records.

**PCI-DSS**

**GLBA**

**GW Internal Policies**

**GW External Notices**
What about Your GW Policies?

Privacy and Information Security Policies

- Personal Information and Privacy Policy
- Information Security
- Records Management Policy (University Records Schedule)
- Social Media Policy
- Privacy of Student Records
- GW Email
- Acceptable Use Policy for Computing Systems and Services
- Acquisition of Computer Hardware and Software
- Social Security Number and GWID Usage
Personal Information and Privacy Policy

**Personal Information:** Any information that relates to an identified individual.

**Purpose of policy:** To promote compliance with national and international privacy laws and regulations.

**Who is governed by this policy?** Students, staff, faculty, contractors and entities (vendors, partners) who generate, collect, use, store and process personal information for GW.

**Why should you know this policy?** Provides you with guidelines for how we collect, use and dispose of personal information.
Privacy by Design

Accountability through the life cycle

How does your office handle data?

• Lawful Basis/Consent
• Transparency
• Data Minimization
• Structured vs unstructured
• Records retention policy
# Data Classification is Key

**Know Your Data**

<table>
<thead>
<tr>
<th>Regulated: Information Protected by local, national or international regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal Data from European Union</td>
</tr>
<tr>
<td>Student Education Records</td>
</tr>
<tr>
<td>Payment Card Information (PCI)</td>
</tr>
<tr>
<td>Research Data that is protected by statute</td>
</tr>
<tr>
<td>Personally identifiable data i.e. Social Security Numbers</td>
</tr>
<tr>
<td>Student Loan Application Information</td>
</tr>
<tr>
<td>Protected Health Information (PHI)</td>
</tr>
<tr>
<td>Export controlled Research</td>
</tr>
<tr>
<td>Law Enforcement Information</td>
</tr>
<tr>
<td>Financial Aid student bills</td>
</tr>
<tr>
<td>Past, present, or future physical or mental health conditions.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Restricted: Information limited to appropriate university faculty, staff, students</th>
</tr>
</thead>
<tbody>
<tr>
<td>Departmental admin</td>
</tr>
<tr>
<td>Course Information/Class Schedules</td>
</tr>
<tr>
<td>Unpublished research</td>
</tr>
<tr>
<td>General Ledger data</td>
</tr>
<tr>
<td>Internal directory information</td>
</tr>
<tr>
<td>Facilities/Physical Plant records</td>
</tr>
<tr>
<td>Proprietary IP</td>
</tr>
<tr>
<td>Wire transfers/Payment history</td>
</tr>
<tr>
<td>Performance appraisals</td>
</tr>
<tr>
<td>Salary/Benefits</td>
</tr>
<tr>
<td>Payroll/Tax Data</td>
</tr>
<tr>
<td>HR Data</td>
</tr>
</tbody>
</table>
Scenarios

Q&A
Top Tips

Consider your business need, process and practice

Privacy Principle

• Structured vs unstructured data
• Data Minimization
• Transmission
• Data Storage
• Device Usage
• Data Disposal

Applying Privacy

• Spreadsheets on hard drive/Pdf of emails
• Is this data necessary to be collected, transmitted, stored, kept?
• BOX, Google Drive, Hard Drive
• Passwords, GW Managed Equipment
• Encryption or Not with GW Network
• Are my working practices secure?
Resources

- Privacy Website
- Information Security Website
- Compliance Website
- Guide to GW’s Information Management and Protection Policies
- Three Steps to Data Security
- How to Use Data Encryption
- Email Security Guide
- International Travel
- Guide to Data Storage and Custodial Practices

Thank You

Feel free to contact us:

Email us: privacy@gwu.edu