

-----Original Message-----

From: owner-STUDENT01-L@listproc.cc.ku.edu on behalf of Provost Office

Sent: Tue 10/30/2007 1:34 PM

To: kulsfa-l - KU Lawrence Staff, Faculty and Affiliates; student01-l - All KU Students

Subject: Notice: Privacy Policy, University of Kansas

TO: KU Lawrence Staff, Faculty and Affiliates; All KU Students

FROM: Richard W. Lariviere, Provost and Executive Vice Chancellor

The University of Kansas is committed to safeguarding all Private Information entrusted to the University by the public and members of the KU community. The University's general privacy policy as it relates to the collection, protection and disclosure of such information is reproduced below.

This policy applies to all units in their handling of information in any form (paper, digital, video, etc.) during the course of conducting University business (administrative, financial, instruction, research or service).

Please be certain you are aware of the expectations and obligations outlined in this policy for you and your unit with regard to the safeguarding of private information.

If you have questions about the collection of information or concerns about adherence to this policy, please contact the KU Privacy Officer in the Office of the Provost (864-9528; [privacy@ku.edu](mailto:privacy@ku.edu)).

POLICY TITLE: The University of Kansas, Lawrence and Edwards  
Campuses

General Privacy Policy

POLICY ADDRESS:

POLICY PURPOSE: To set forth requirements regarding information entrusted to the University by the public and members of the KU community.

APPLIES TO: All units in their handling of data, information and records in any form (paper, digital text, images, audio, video, microfilm, etc.) created, collected, accessed, used, handled, stored, managed or disposed of during the course of conducting University business (administrative, financial, instruction, research or service).

POLICY STATEMENT: KU Commitment to Privacy

The University of Kansas is committed to safeguarding all Private Information entrusted to the University by the public and members of the KU community. This notice describes the University's general privacy policy as it relates to the

collection, protection and disclosure of such information. (Note: see the "Definitions" section below for the definition of "Private Information.")

#### Collection and Protection of Information

Information may be collected in a variety of ways, paper or electronic, including but not limited to, Web sites, surveys, email, information requests, databases, etc., as required to support University activities.

Information collected, regardless of the method of collection or format, may be used only to carry out the authorized business of the University. The University shall make reasonable efforts to limit the Private Information it collects to only that information strictly relevant to accomplish a clearly defined institutional purpose.

Every unit is responsible for maintaining the necessary confidentiality, integrity and availability of the information it handles. Every unit is responsible for granting to assigned individuals within the unit the reasonable, minimum access to Private Information needed to accomplish the necessary institutional purposes. All University employees are required to abide by state and federal laws and University policies, procedures and guidelines regarding the handling and protection of Private Information.

Employees who become aware of a breach of the privacy or security of Private Information must report such breach immediately to the Information Services Customer Service Center at 864-8080. The Information Services Customer Service Center will notify the KU Privacy Office and/or the KU IT Security Officer as required by the particular incident.

Additional University policies, procedures and guidelines apply to specific types of information. All relevant policies, procedures and guidelines apply to any given piece of information.

#### Disclosure of Information

Private Information may be disclosed only to the extent that is permitted or required by law. Disclosure must comply with applicable requirements regarding consent or authorization for disclosure.

#### Legally Mandated Disclosure of Information

The University may be required to release information, including Private Information, where required by state or federal law or upon receipt of a subpoena, search warrant or other court order.

#### KU Employee Privacy When Using University Resources

The University supports a climate of trust and respect. The University does not

ordinarily read, monitor or screen employees' routine use of information resources, except as necessary to maintain quality of service, to investigate a breach of security or misuse of University information resources or where required by law.

For additional information about the appropriate use of University resources, refer to the Acceptable Use Policy.

#### Questions

If you have questions about the collection of information or concerns about adherence to this policy, please contact the KU Privacy Officer in the Office of the Provost (864-9528; [privacy@ku.edu](mailto:privacy@ku.edu)).

**CONSEQUENCES:** Violations of this policy may result in disciplinary action, up to and including dismissal of employees. Employment actions will be conducted under the advice and guidance of Human Resources/Equal Opportunity and the Office of the General Counsel.

**CONTACTS:** Responsible Office: Provost's Office

**APPROVED BY:** Provost and Executive Vice Chancellor  
**APPROVED ON:** October 30, 2007  
**EFFECTIVE ON:** October 30, 2007  
**REVIEW CYCLE:** Annual

#### BACKGROUND:

**RELATED DOCUMENTS:** Student Records Policy  
Information Technology Security Policy  
Data Removal from KU-Owned Computers  
Internet-Based Credit Card Processing Policy  
Password Policy

Acceptable Use of Electronic Information Resources  
Procedures for Investigative Contact by Law Enforcement  
Electronic Mail (Email) Policy

Gramm-Leach-Bliley Student Financial Information Security Program

#### Laws:

Family Educational Rights and Privacy Act (FERPA)  
Health Insurance Portability and Accountability Act (HIPAA)  
Gramm-Leach-Bliley Financial Services Modernization Act (GLB)  
Electronic Communications Privacy Act (ECPA)  
Patriot Act  
Computer Fraud & Abuse Act  
Kansas Open Records Act

## Americans with Disabilities Act (ADA)

### DEFINITIONS:

Private Information includes all information protected by state and/or federal law or that the University is contractually obligated to protect. Private Information also includes information designated by the University as private (confidential or sensitive) through the creation of standards, procedures and guidelines. Access to these data must be tightly monitored.

Examples of Private Information include, but are not limited to the following:

- \* Nondirectory student records as defined by FERPA and the University Student Records Policy ([www.vpss.ku.edu/records.shtml](http://www.vpss.ku.edu/records.shtml))
- \* Financial aid and scholarship records
- \* Individually identifiable personnel records
- \* Personal information utilized to verify identity, including but not limited to Social Security numbers (SSN) and University ID numbers (KU ID)
- \* Passwords and PINS
- \* Digital signatures
- \* Individually identifiable health information protected by state or federal law (including but not limited to "protected health information" as defined by the Health Insurance Portability and Accountability Act (HIPAA))
- \* Individually identifiable information created and collected by research projects
- \* Credit card numbers and financial transactions covered by the Payment Card Industry (PCI) Standard
- \* Information resources with access to confidential or sensitive data
- \* Information covered by nondisclosure agreements

appendices:

KEYWORDS:

REVIEW/CHANGE HISTORY: