

<b>Policy and Procedure Manual/ Alumni Services/Association, SIU Foundation/ SIU Alumni Association</b>	<b>Version Number: 4</b>
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## Information Access, Privacy, and Security Policy

**Purpose:** This policy is intended to ensure timely and efficient Information access for individuals with legitimate needs for Information, while maintaining the confidentiality and security of this Information. Compliance promotes the integrity of relationships between alumni, donors, friends, members, the SIU Alumni Association, the SIU Foundation, and Southern Illinois University Carbondale.

**Scope:** This policy applies to data, Information, and systems owned by the SIU Alumni Association and/or SIU Foundation – including electronic and paper records, and all other forms of business and proprietary data and Information.

**Authorization:** This policy is jointly approved by the SIU Alumni Association and SIU Foundation, entities collaborating in the use of Information beneficial to both parties. Originally adopted by the SIU Alumni Association and SIU Foundation Boards of Directors on October 5, 2001. Current version approved on October 19, 2018.

### Policy:

I.	Statement of Purpose .....	3
II.	Central Tenets .....	3
	A. The Right to Privacy .....	3
	B. Information Necessity and Integrity .....	3
	C. Ethical Responsibility .....	3
III.	Statement of Information Access and Privacy Policy.....	3
	A. Definition of Information Users .....	3
	B. Levels of Access .....	5
	C. Confidentiality and Privacy Agreements .....	5
	D. Privacy Statement .....	5
	E. Policy Compliance.....	6
IV.	Information Security and Data Protection .....	6
	A. Password/Passphrase Standards.....	6
	B. Incident Response Standards .....	7

C. Acceptable Use Standards .....7

D. Safeguards for Sensitive Data.....7

## **I. Statement of Purpose**

This policy is intended to ensure timely and efficient Information access for individuals with legitimate needs for Information, while maintaining the confidentiality and security of this Information. Compliance promotes the integrity of relationships between alumni, donors, friends, members, the SIU Alumni Association (“Association”), the SIU Foundation (“Foundation”), and Southern Illinois University Carbondale.

More fundamentally, this policy guides the Association’s and Foundation’s use, maintenance, and sharing of biographical, membership, transaction (gift/pledge), and related Information concerning alumni, donors, prospects, members, and other constituents. The Association and Foundation maintain such Information exclusively for business and proprietary purposes in service of Association and Foundation objectives. This Information consists of electronic records, paper records, and all other forms of business and proprietary data and Information (hereafter referred to as “Information”)

This policy is to be construed consistent with contracts that may be in existence between the parties, or a party and Southern Illinois University Carbondale. If this policy conflicts with any contracts between these parties, the contract terms supersede this policy.

## **II. Central Tenets**

The Association and Foundation have adopted the following basic principles:

### **A. The Right to Privacy**

Every Foundation and Association constituent (alumni, donors, members, volunteers, and other friends) has the right to not have personal Information exposed or released outside of the Foundation and Association working environments. Individually identifiable Information is considered confidential.

### **B. Information Necessity and Integrity**

Foundation and Association Information is collected, retained, and utilized for approved business and proprietary purposes only, and is recorded and maintained as accurately as possible.

### **C. Ethical Responsibility**

Any individual accessing this Information is responsible for signing and complying with relevant confidentiality and/or privacy agreements.

## **III. Statement of Information Access and Privacy Policy**

### **A. Definition of Information Users**

#### **1. Internal Users**

- a. Association and Foundation Board Members
- b. Executive Users
  - i. Executive Director of the Association
  - ii. CEO of the Foundation
  - iii. Chancellor of Southern Illinois University Carbondale
- c. Staff Assigned to Association and Foundation functions
  - i. Individuals granted a Staff assignment to the Association by the Executive Director and the Chancellor of Southern Illinois University Carbondale
  - ii. Individuals granted a Staff assignment to the Foundation by the CEO of the Foundation and the Chancellor of Southern Illinois University Carbondale
  - iii. Individuals directly employed by the Association or the Foundation
- d. Southern Illinois University Foundation Fiscal Managers – Individuals granted fiscal management for Foundation accounts

**2. Internal and External Auditors**

**3. External Users**

- a. Southern Illinois University President's Office
- b. Southern Illinois University Carbondale
  - i. Academic, Administrative, Athletics, or Auxiliary Units
  - ii. Faculty/Staff
  - iii. Students (independent research projects)
  - iv. Registered Student Organizations
- c. Volunteers
  - i. Association and Foundation Committee Members who are not Board Members
  - ii. Officially recognized Association Chapter, Club, or Group members
  - iii. Anyone assisting a staff member of the Association or Foundation on an approved project
- d. Contractual Partners - Entities that have contractual agreements to provide goods and/or services to the Association, Foundation, and/or Southern Illinois University Carbondale
- e. Regulatory or Government Agents
- f. Outside Professional Organizations
- g. Media

- h. Any user not previously identified

## **B. Levels of Access**

Access to Information owned by the Association is managed by the Executive Director of the Association.

Access to Information owned by the Foundation is managed by the CEO of the Foundation.

Access to Information jointly owned by the Association and the Foundation is managed by the Information Access Committee which consists of:

- Executive Director of the Association
  - Assistant Treasurer of the Association
  - CEO of the Foundation
  - Director of Development of the Foundation
  - Treasurer of the Foundation
  - Executive Director of Advancement Services
1. Internal Users – Access to Association and/or Foundation Information is assigned to individuals to the extent necessary to perform duties and responsibilities as outlined by assigned roles.
  2. Internal and External Auditors – Access to Information is assigned to auditors to the extent necessary to perform professional services.
  3. External Users – External Users will have no direct access to Foundation or Association Information. These individuals may be approved to utilize Information only in a manner benefitting the Association, Foundation, and/or Southern Illinois University. Information release is governed by the operating procedures of the Association and/or the Foundation.

## **C. Confidentiality and Privacy Agreements**

As a condition of access, an Information user will be required to read this Information Access, Privacy, and Security Policy and sign a confidentiality or privacy agreement relevant to his or her role. These agreements are periodically updated under the direction of the Executive Director of the Association and CEO of the Foundation.

## **D. Privacy Statement**

The Association and Foundation have adopted the following Privacy Statement for publication on relevant web pages:

*The Southern Illinois University Alumni Association (hereafter referred to as “Association”) and the Southern Illinois University Foundation (hereafter referred to as “Foundation”) are jointly committed to maintaining the trust and confidence of our alumni, members, donors, and friends.*

*An important benefit of your affiliation with the Association and/or the Foundation is the opportunity to receive communications, offers, products, and services. For this reason, we want you to understand how we obtain Information and protect your privacy.*

*If you are an alumnus of Southern Illinois University Carbondale (hereafter referred to as “University”), Information is obtained from your University student record. Nonpublic personal Information about alumni, members, donors, and friends is obtained from personal interactions, communications, surveys, transcript requests, and activities with the University and its affiliates.*

*The Association and/or the Foundation restrict Information access to only those who perform authorized activities. The Association and the Foundation have implemented physical, electronic, and managerial procedures to safeguard and secure this Information, prevent unauthorized access, maintain data accuracy, and ensure its appropriate use.*

*You may withdraw from any of our services by notifying the Executive Director of Advancement Services, Southern Illinois University Carbondale, Colyer Hall, Mail Code 6836, 1235 Douglas Drive, Carbondale, IL 62901. Phone: (618) 453-4900.*

#### **E. Policy Compliance**

It is the responsibility of each Information user to complete any required training, to maintain confidentiality in accordance with Foundation and Association policy, and to use data and Information exclusively for the purposes for which it was initially provided.

Information users agree never to directly or indirectly publish, disseminate or otherwise disclose any Information acquired from the Association and/or the Foundation, except as authorized.

Failure to comply with this policy in whole or part may result in disciplinary and/or legal action in accordance with Association policy, Foundation policy, and/or applicable laws. The Information Access Committee has the authority to review all infractions and determine the appropriate course of action, including (but not limited to) access revocation.

### **IV. Information Security and Data Protection**

Effective November 1, 2016 the Foundation entered into a contractual arrangement with the SIU Office of Information Technology (OIT). As a contractual customer or vendee, the Foundation/Association has adopted OIT policies and procedures related to Information technology security and data protection.

#### **A. Password/Passphrase Standards**

These standards establish requirements for the creation of strong passwords/passphrases, the protection of those passwords/passphrases, and the frequency of change. Refer to OIT Password/Passphrase Standard Document Number ISP-005, Version 1.0 (<https://saluki.sharepoint.com/sites/oit/isp/Documents/Public/SIU%20Password%20Standard.pdf>)

## **B. Incident Response Standards**

These standards establish requirements for responding to Information security incidents in order to mitigate risk and to ensure adherence to laws and regulations including the Illinois Personal Information Protection Act (PIPA), the Health Insurance Portability and Accountability Act (HIPAA), and the Family Educational Rights and Privacy Act (FERPA). Refer to OIT Incident Response Standard Document Number ISP-009, Version 1.0

(<https://saluki.sharepoint.com/sites/oit/isp/Documents/Public/Incident%20Response%20Standard%20v1.0.pdf>)

## **C. Acceptable Use Standards**

These standards establish acceptable and unacceptable use of electronic devices, Information systems, and network resources. They safeguard the electronic Information system user and owner, ensuring compliance with legal and contractual requirements.

Refer to University OIT Acceptable Use Standard Document Number ISP-013, Version 1.0 (<https://oit.siu.edu/common/acceptable-use-standard-2018.pdf>)

## **D. Safeguards for Sensitive Data**

The Information Technology staff manages utilization of automated identity data query software, such as Identity Finder. These automated processes periodically scan and report data that may represent High Risk or Confidential data for appropriate removal from a computer hard drive.