

SUBJECT: Financial Affairs

Policy: 501.1 Safeguarding Customer Information

Effective: November 2003 Revised:

Reviewed: February 2022

Introduction and Purpose

This policy is being introduced as required by the Federal Trade Commission under the Gramm-Leach-Bliley (GLB) Act.

At Great Falls College MSU, safeguarding the privacy and confidentiality of personal information is important. As an institution of higher education, we collect, retain, and use personal non-public information about individual students and staff members. We may collect personal information from such sources as hard copy applications, electronic forms, background checks, or over the Internet. The objectives of our information security program are to ensure the security and confidentiality of such personal information; to protect against any anticipated threats to its security or integrity; and to guard it against unauthorized access or use.

Any sharing of nonpublic personal information about our students or employees must be done in strict adherence to the Federal Family Educational Rights and Privacy Act (FERPA) guidelines. The College may exchange such information with certain nonaffiliated third parties (under limited circumstances) to the extent permissible under law. Examples may include (but are not limited to) medical insurance institutions or credit card processing software companies.

We restrict access to student and employee information only to those employees who have business reasons to know such information, and we educate our employees and contract service providers about the importance of confidentiality and privacy.

Policy

In order to provide adequate safeguards over customers' credit card data and electronic addresses as they are received over the Web, the College will adhere to the following minimum technical specifications:

- a. Any server on the College network that makes non-personal public information available must be certified secure. A copy of the security certificate must be forwarded to IT before any such server is connected to the network.
- b. Customer information, including credit card data, must be reasonably secured against disclosure and modification.
- c. Great Falls College MSU must oversee local and contracted service providers by taking steps to select and retain providers that are proven capable of maintaining appropriate safeguards for customer information.
- d. Great Falls College MSU will contractually require service providers to implement and maintain such safeguards; and
- e. Great Falls College MSU will periodically evaluate, based on results of testing and monitoring, any material changes to the service providers' operations.

Information Technology will review each department's hardware and software to ensure that all equipment is secure.

The following safeguards should be in place:

- Personal computers containing confidential information must be secure.
- Adequate internal controls regarding separation of duties must be in place.
- It is each department's responsibility to maintain the credit card or e-mail information in a confidential manner.
- Any hard copy documents containing confidential information must be shredded in a timely manner.