

	<b>UNIVERSITY OF PASADENA (UPAS)</b> <b>Operational Procedures</b>		
	Doc # :PO-OP-04.2	Title: Confidentiality and Privacy Policy	
	Rev # : 05	Approved By: Chief Executive Officer (CEO)	Date : 09 Oct 2019

REVISION HISTORY			
Rev No	Description of change	Author	Effective Date
1	New Procedure	Chief Operations Officer (COO)	14 Oct 2015
2	No Change	Chief Operations Officer (COO)	12 Oct 2016
3	No Change	Chief Operations Officer (COO)	11 Oct 2017
4	No Change	Chief Operations Officer (COO)	10 Oct 2018
5	No Change	Chief Operations Officer (COO)	09 Oct 2019

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**1. Purpose**

1.1 University of Pasadena is committed to protecting the privacy and confidentiality of students, staff, Board members, volunteers and stakeholders in the way information is collected, stored and used.

1.2 This policy outlines University of Pasadena’s legal obligations and ethical expectations related to privacy and confidentiality.

**2. Scope**

2.1 The University respects individual privacy and the laws governing it. UPAS remains committed to protecting and safeguarding the Personal Information of our students, faculty, staff, alumni, donors and others who access its products and services.

2.2 This University complies with The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99). FERPA is a Federal law that protects the privacy of student education records.

**3. Definitions**

3.1 Confidentiality applies to the relationship of confidence. Confidentiality ensures that information is accessible only to those authorised to have access, need to know and is protected throughout its lifecycle. Confidential information may be marked as such or deemed confidential by its nature, e.g. it is information that is not available in the public domain.

3.2 Privacy provisions govern the collection, protection and disclosure of **personal information provided** to University by clients, Board members, staff, volunteers, students and stakeholders.

**4. Responsibility**

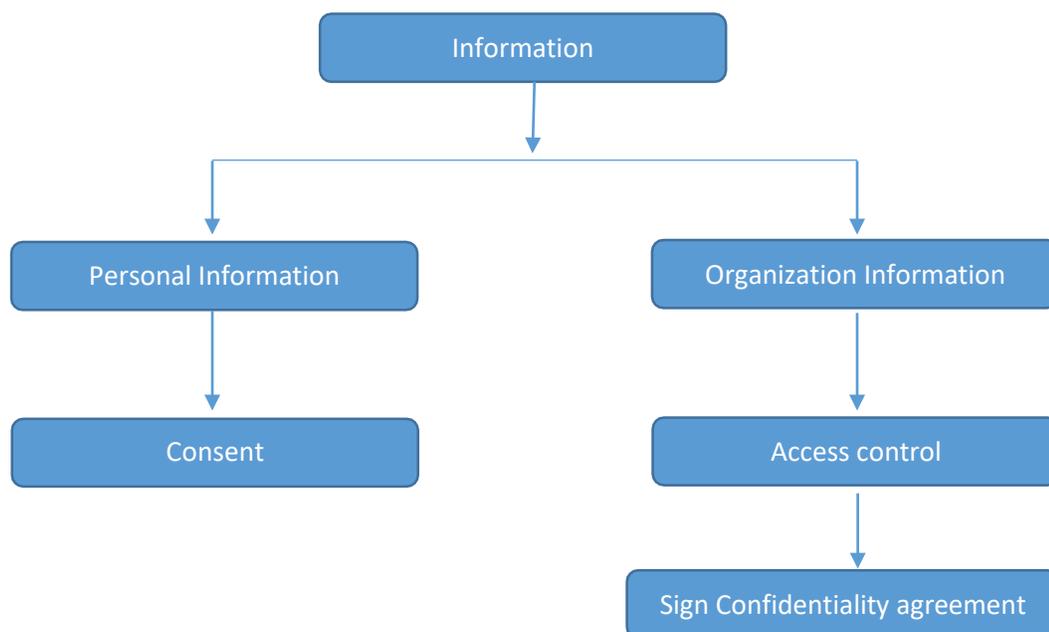
4.1 The Chief Operation Officer (COO) is responsible for the effective implementation of the policy.

**5. Procedure / Process**

University of Pasadena holds two types of information that are covered by this policy; personal and organizational. The personal information privacy and confidentiality are compliant through

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the consent forms and organizational information is protected through data access control system.



### 5.1 Consent

The University obtains the consent of its students, faculty, alumni and others accessing its products and services to collect, use or disclose Personal Information. Consent can be provided in writing, electronically by email or through an authorized representative, or it can be implied where the purpose for collecting, using or disclosing the Personal Information would be considered obvious and the individual voluntarily provides Personal Information for that purpose.

The University may collect, use or disclose Personal Information without an individual's knowledge or consent when permitted by law including, by way of example:

- When the collection, use or disclosure is required or authorized by law (e.g., Directory Information permitted by FERPA;

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- In an emergency that threatens an individual’s life, health or personal security;
- When the Personal Information is available from a public source (e.g., a telephone directory); and
- When the University seeks or otherwise requires legal advice from an attorney.

### 5.2 Use of Personal Information

The University limits its collection, use and disclosure of Personal Information for purposes that would be considered reasonable in the circumstances and only such information is required for the purposes of providing services, products or information to students, faculty, staff, supporters and others who access its products and services.

The University uses only fair and lawful methods to collect Personal Information. The University’s use of Personal Information is limited to the purposes described in this policy. The University does not use or disclose an individual’s Personal Information for any additional purpose without consent.

### 5.3 Disclosure of Personal Information

As a general rule, all information concerning students, faculty, alumni, donors and others who access University products and services is held in strict confidence and, except in limited circumstances, not revealed to anyone else unless expressly or implicitly authorized by such individuals. Where the University is obliged or permitted to disclose Personal Information without consent, the University does not disclose more information than necessary.

Personal Information collected by the University is collected for its own requirements and the University does not sell, loan or share such Personal Information with outside entities; however, the University may publish or otherwise release certain Personal Information as Directory Information as authorized pursuant to the Family Educational Rights and Privacy Act (FERPA) and various University policies, rules and procedures related thereto. Moreover, there are a few exceptions including but not limited to the following:

- The University may, with consent, provide Personal Information to another entity affiliated with it if it has no local presence where the person is located or if the entity’s activities are more closely matched to his or her needs and requirements.

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- The University may provide Personal Information to outside suppliers or contractors from whom it obtains services.
- The University may disclose Personal Information to meet regulatory requirements or otherwise without consent, as required or permitted by law in fulfillment of its mission.

#### 5.4 Data access control system.

The data is protected by a strict access control mechanism so that only the person who needs to know the data has access to it. All personal data is protected by strong password and access is tracked and logged. Anyone who accesses the personal data without proper approval or access will be subject to strict disciplinary actions.

The Institution staffs are required to sign the confidentiality agreement that they will follow the privacy policy and related procedures in a proper manner relating to collection, storage, access and disposal of records.

#### **6. Review**

The university reviews the Confidentiality and Privacy Policies every year.