

II. Policies Affecting the Delivery of Programs

II-2. Other Campus Issues

II-2.034 Personal Information Protection Policy

Guilford Technical Community College maintains electronic and written personal information which is essential to performing college business. The college has both rights and obligations to manage, protect, secure, and control identifying information. Personal identifying information includes but is not limited to an individual's name combined with any confidential distinguishing information and/or numbers such as social security numbers, bank account numbers, credit cards numbers, driver's license numbers, and personal identification numbers (PINs). Every employee, student and affiliate (including but not limited to contractors, temporary staff, consultants, volunteers, and vendors) of GTCC should protect this personal information when collecting, using, transferring, storing, and disposing of it.

Procedures

1. Every student, employee and affiliate of GTCC should have access to a copy of this policy.
 - a. All employees should be made aware of the personal information protection policy and their related responsibilities.
 - b. The Director of Human Resources and the Director of MIS will serve as the privacy compliance officers (PCOs) and be responsible for the following:
 - 1) Ensuring that all employees have access to training on protecting personal information,
 - 2) Monitoring how the college protects personal information,
 - 3) Answering questions about appropriate disposal methods, and
 - 4) Ensuring that appropriate government agencies and affected individuals are notified of breaches.
 - c. The Vice President of Educational Support Services is responsible for notifying students of personal information protection practices related to students.
 - d. Each primary college contact is responsible for informing each affiliate of the personal information protection policy.
2. All documents requesting personal identifying information will contain a statement explaining the intended use of that information.

3. Any one who does not protect personal identifying information will be subject to disciplinary action that may include termination of employment and/or prosecution.
4. Each employee, student and affiliate of GTCC is responsible for immediately notifying his/her immediate supervisor about any perceived policy violations whether observed or intentionally or unintentionally committed.
 - a. The immediate supervisor will then complete a personal information protection incident reporting form and submit it to a privacy compliance officer.
 - b. Anyone perceiving a violation by his/her immediate supervisor or primary contact should report it to the next level of supervision.
 - c. An individual reporting a perceived abuse will not be punished for reporting the incident as long as the claim is not determined to be malicious in nature.
 - d. A privacy compliance officer will ensure that appropriate governmental agencies and affected individuals are notified as soon as possible following a security breach.
5. Personal information must be disposed of in a manner that ensures confidentiality and prevents the personal information from being recovered or reconstructed when it is no longer needed and is no longer required to be maintained by law or under GTCC's record retention procedures.
6. GTCC will adhere to all related policies, procedures, and mandates including but not limited to the *GTCC Management Manual* and the NC Identity Theft Prevention Act. The management manual contains the following related policies and procedures:
 - a. Use of Private Information - Management Manual II-2.0354
 - b. Management Information System Security - Management Manual II-2.0355
 - c. Communicable Diseases - Management Manual II-2.040
 - d. Right to Privacy - Management Manual III-2.060

Adopted 10/26/06