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## Confidentiality

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### OPERATIONAL POLICY STATEMENT

College employees and affiliates have a duty to protect all confidential information attained during the course of employment or service to YC.

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### DEFINITIONS

**Employee** - A College employee is any person employed to perform duties or services for Yavapai College.

**Affiliate** - A College affiliate is any individual or entity that is not directly employed by Yavapai College, but is granted access to confidential information for the purposes of performing services for the College.

**Confidential Information** – Confidential Information includes, but is not limited to the following:

- Personal and financial data
  - Social Security numbers (SSN)
  - Credit card numbers
  - Banking Information
  - Identification Numbers (passport, driver's license number)
  - Tax Information
  - Other personally identifiable information that could be used for identity theft
- Federal and State Protected Data
  - FERPA-protected data
  - HIPAA-protected data
- Sensitive or restricted data noted in YC's "Information Security Data Classification Standard"
- Passwords

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### PROCEDURE

All employees and affiliates granted access to confidential information hold positions of trust and must preserve the security and confidentiality of the information they collect in the performance of their duties. All users of College data and information are required to abide by all applicable College, Federal, and State guidelines regarding the confidentiality of information. Any employee or affiliate with authorized access to YC's computer systems, information, records, and files shall use any acquired data solely for College business.

- Confidential information is to be accessed, used, and disclosed only with authorization and in-line with an employee's job function or an affiliate's service.
- College resources must not be used to obtain, store, or transmit confidential information regarding any individual or entity without authorization or in violation of YC's Information Security Data Classification Standard.
- Confidential information must never be divulged to anyone outside of Yavapai College without authorization, or to anyone within the College without the need-to-know for business purposes.
- All employees and affiliates have a duty to use available physical, technological, and other administrative safeguards to protect the security of confidential information regardless of form or medium. The College shall attempt to implement administrative safeguards such as Data Loss Prevention (DLP) to protect against unintended disclosure of confidential information, however no technology can completely prevent improper data disclosure and primary responsibility for protection of information rests with the employee or affiliate.
- Upon termination of employment, end of service or material change in employment employees or affiliates will return originals and copies of documents and files containing confidential information to the College and relinquish all further access to that information.

### **Enforcement of Standards**

Engaging in any activity that violates these standards related to confidential information can result in the loss of access privileges and/or other discipline up to and including termination.

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### **OPERATIONAL POLICY HISTORY**

Adopted 12/2/2014

Revised 08/20/2019

Revised to "Operational" Policy 3/5/21

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