

3359-11-10.4 Customer information security policy

(A) Introduction.

- (1) The university of Akron is committed to respecting and protecting the privacy of non-public customer information. The purpose of the policy outlined in this document is to enable appropriate university officials to implement a comprehensive written information security program and comply with the provisions of the federal trade commission's safeguard rules implementing applicable provisions of the Gramm

- (b) About a customer resulting from any transaction with the university involving a financial service;
- (c) Otherwise obtained about a customer in connection with providing a financial service to that customer; or
- (d) Any list, description or other grouping of customers (and publicly available information pertaining to them) that is derived using any information listed above that is not publicly available.

(D) Information security program coordinator.

(1) The president shall appoint an information security program coordinator to implement, coordinate and oversee the information security program at the university of Akron. The "ISPC" shall seek to assure that customer information is secure at the university and shall be responsible for the following duties:

(a) Designing and implementing, with the assistance of the university's information technology security officer ("ITSO"), appropriate individuals in the affected offices of the university and any other individuals the "ISPC" deems appropriate, safeguards, systems, procedures and protocols, which, together with this rule, shall comprise the university's comprehensive written information security program;

(b) Assisting the "ITSO" in the implementation of the information security program;

- (d) Designing and implementing additional information safeguards, systems or procedures necessary to control identified risks to the security, confidentiality and integrity of customer information;
- (e) Monitoring and testing the effectiveness of customer information safeguards, systems and procedures at regular intervals;
- (f) Coordinating with those responsible for third party service procurement activities for affected departments to raise awareness of, and to institute methods for, selecting and retaining only those service providers that are capable of maintaining appropriate safeguards for customer information to which they will have access;
- (g) Evaluating and revising the university's comprehensive written information security program in light of the results of the testing and monitoring of the university's comprehensive written information security program, any material changes to the university's operations or business arrangements or any other circumstances that the "ISPC" knows or has reason to know may have a material impact on the university's information security program;
- (h) Coordinating with the "ITSO" and appropriate individuals in the relevant

contracts entered into with third party service providers ~~have~~ access to customer information, provided that amendments to contracts entered into prior to June 24, 2002 are not required to be effective until May 2004.

(F) Compliance.

(1) All university personnel shall cooperate fully with the university "ISPC."

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Certification:

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Ted A. Mallo  
Secretary  
Board of Trustees

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