

CALIFORNIA STATE UNIVERSITY, DOMINGUEZ HILLS

CONFIDENTIAL INFORMATION

POLICY: Security of confidential information concerning constituents is the responsibility of all CSUDH employees, including student assistants who have access to University Advancement Data. Information on constituents is stored in both electronic and hard copy form.

For the purposes of all policies related to “confidential information,” the term is defined as any information about an identifiable constituent, such as an alumnus/a, parent, donor, friend, or organization, including corporations and foundations. Information may include the following:

- Home, work and electronic addresses
- Giving history
- Degrees and majors
- Biographical information (e.g., birth, death, gender, ethnicity, marital status etc.)
- Profile information (e.g. wealth, inclination to the university etc.)

Such information is confidential by law or public policy because it is “proprietary” (e.g., the property of the University) or is confidential by custom and courtesy or whose release might prejudice positive relationships between the University and its constituents.

CALIFORNIA STATE UNIVERSITY, DOMINGUEZ HILLS

CONFIDENTIAL INFORMATION

COLLECTION

POLICY: The Division of University Advancement collects information to support the identification, evaluations, cultivation, solicitation, and stewardship of donors or potential donors to CSUDH. The majority of this information is collected from public sources (i.e., newspapers, magazines, and electronic databases) that are available to the general public. Confidential information for these purposes may be collected from University records, such as the donor database, student records, and from UA staff.

Confidential information may include but is not limited to:

- Addresses
- Telephone numbers
- Email addresses
- Employment information
- Excerpts of student records
- Correspondence to or from the individual or organization
- Information concerning gifts or grants to the University
- Contact reports and internal memoranda

CALIFORNIA STATE UNIVERSITY, DOMINGUEZ HILLS

CONFIDENTIAL INFORMATION

ACCESS

POLICY: Access to information held by University Advancement, whether confidential or not, is limited to employees of CSUDH whose job duties require it. In most circumstances, these individuals will be actively involved in identification, evaluation, cultivation, solicitation, and stewardship of donors or potential donors to the University. Usually, these individuals are University Advancement staff and certain senior administrative officers. Most student assistances employed by the division will not have access to University Advancement files and records. Guidelines for access include:

- Every person must sign an authorized user form
- Only the advancement services office has authority to grant access to the database
- The number of users is limited to the number of licenses authorized by the software provider
- Every user is bound by the information confidentiality regulations set by the Federal Law, the State of California and the ones established by this book.

PASSWORD MAINTENANCE POLICY

POLICY: Passwords must be confidential and should comply with the policies set by the CSU Department of information technology on their document PM 2007-02 section 6.1 (K)

All users must observe:

Password Length = 8 characters

Password Complexity = Yes

Requires any combination of three of the following four:

- Upper case (A,B,C)
- Lower case (a,b,c)
- Numerals (1,2,3)
- Symbols (!,*,%)

Password lockout = 3 bad attempts

CALIFORNIA STATE UNIVERSITY, DOMINGUEZ HILLS

CONFIDENTIAL INFORMATION

INFORMATION RELEASE

POLICY: The CSUDH University Advancement maintains a database of biographical and gift/pledge information about University alumni and friends in accordance with the general needs and expectations of the University community. The information contained in this database is intended exclusively for the purposes related to CSUDH programs.

It is the desire of the Office of University Advancement to support ongoing activities of CSUDH by providing assistance for programs, communications, and events which bring together alumni, donors, and friends of the University. In order to provide the best possible service to those with legitimate needs for such information, and at the same time maintain the confidentiality of the information entrusted to us by our alumni, the following policies have been developed. These policies have been approved by the Vice President of University Advancement, Director of Advancement Services and Director of Alumni Programs, and will apply to every request for information.

PROCEDURES: Information Release. Request for information will be accepted from the following constituents:

- Offices within University Advancement (Alumni Affairs, Development, Ceremonies and Events, Communications and Public Affairs, Government and Community Relations)
- Administrative Units of CSU Dominguez Hills
- Academic Units of CSU Dominguez Hills
- Athletic Units of CSU Dominguez Hills
- Career Development Center(s) of CSU Dominguez Hills
- Agencies that assist Advancement in locating lost alumni and updating systems.
- Members of the following: Alumni Council, Foundation Board and College Boards who are advancing the progress of the University.
- Other Colleges, Universities, State and Federal Agencies seeking public information about CSU Dominguez Hills alumni and its demographics
- Third party vendors authorized by CSU Dominguez Hills to research, solicit and conduct surveys on its behalf

Requests from an Alumni/Student for the contact information of another Alumna/us have to be in a written request to the Office of Alumni Programs, The Office of Alumni Programs will contact the person who is being asked about and will let him/her know of the request. It will be at their discretion to contact the requestor back.

CONFIDENTIAL INFORMATION CONTINUED

In cases of dispute about whether an organization has legitimate affiliation with the University, the final decision will rest with the Vice President for Advancement.

No information will be released for the following records:

- Records coded as “No Mail” in the alumni/donor system
- Depending on the purpose of the information released records to be omitted include:
 - Records coded as Do Not Email
 - Records coded as Do Not Phone
 - Records coded as Do Not Solicit
 - Records who opted out from affinity partners

DISCLOSURE: University Advancement reserves the right to determine the date in which solicitations or communications should be made to its constituents if it interferes with the strategic planning of solicitations and communications scheduled by this office.

1. Information that may be released from the Alumni/Donor database
 - a. Public Information available for release is limited to:
 - i. Full name
 - ii. Mailing address
 - iii. Telephone number
 - iv. E-mail address
 - v. Fax number
 - vi. Degree(s) and date of degree(s) awarded by CSU Dominguez Hills
 - vii. School(s) from which degree(s) was/were granted with major field of study
 - b. In addition to public information data requests from units within the CSU Dominguez Hills will be provided with the following information as needed upon request:
 - i. Employment
 - ii. Biographical details such as ethnicity, gender, age and geographic region
 - iii. Relationships (spouse, children, organizations etc.)
 - iv. Gift/Pledge data
 - v. Event Attendance

A data request form will be submitted to the office of Advancement Services and approved by the VP of University Advancement. With no exception the purpose and use of information as well as a copy of the material to be sent to our constituents has to be submitted to University Advancement. Data will be provided in electronic format Text file or Excel® spreadsheet.

In all cases involving the use of outside vendors, the absolute confidentiality of the information provided from the Alumni/Donor database is the responsibility of the requestor.

CALIFORNIA STATE UNIVERSITY, DOMINGUEZ HILLS

CONFIDENTIAL INFORMATION

INFORMATION RELEASE, OUTSIDE PARTIES, NON-VENDOR

POLICY: Occasionally, outside parties (i.e., courts, law enforcement agencies, media, or others) may request or require information held by CSUDH University Advancement. **UNDER NO CIRCUMSTANCES WHATSOEVER MAY ANY MEMBER OF THE University Advancement STAFF RELEASE INFORMATION IN RESPONSE TO SUCH REQUESTS.** The University has designated certain employees to respond on its behalf. All such requests or requirements must be immediately referred to the Vice President of University Advancement. This includes accepting a service of a subpoena from a court. The individual serving the subpoena must be referred to the University officer designated to accept service.

Failure to abide by any of the policies stated within this document may result in denial of access to information contained in the University Advancement database and possible prosecution. Request for re-instatement of access to this information must be approved by the Vice President of University Advancement or his/her designee and must include written assurance of future compliance with these policies.

PROCEDURE: Requests from outside parties for confidential information shall be referred to the Vice President of University Advancement for proper handling.

CALIFORNIA STATE UNIVERSITY, DOMINGUEZ HILLS

INFORMATION STORAGE AND SECURITY

POLICY: Physical records containing confidential information are to be scanned and stored electronically in the secure organization Drive I. All documents **MUST** be shredded after being scanned. Donor files guidelines include:

- All donors who reach a cumulative giving of \$5,000 USD excluding gifts in Kind must have a donor file
- Officers within university advancement are the only ones authorized to access these files and the donors in case they request to do so in observance of the US Privacy Act (5 U.S.C. § 552a) The donor files should include:
 - Constituent profile
 - Copies of communication between the constituent and CSU Dominguez Hills
 - Letters of acknowledgement
 - Copies of checks
 - Scholarship agreements
 - Pledge Agreements

ELECTRONIC FILES

POLICY: Information on CSUDH constituents that contains information such as name, address, and giving information must be stored in the drive assigned to the user by IT, which is backed up nightly. The donor database contains all gift information, address and employment information, and other demographic data. Information stored on the University shared network is only available to authorized staff. All Division staff member are required to sign the donor database authorization form.

RECORD RETENTION AND DESTRUCTION

POLICY: Records no longer needed to support the work of UA staff are not maintained. Records that are no longer required are to be shredded in the immediate office.

CALIFORNIA STATE UNIVERSITY, DOMINGUEZ HILLS

CONFIDENTIAL INFORMATION

TRAINING

POLICY: All individuals granted access to information held by the Division of University Advancement shall be trained in requirements and practices to ensure confidentiality of information. Current employees will be trained each year as part of a division-wide annual training. New employees will be trained as part of their orientation to the division. Training will include review of applicable law and University and Division confidential information security plans, policies, and procedures. Staff will be asked sign the Alumni/Donor Database User Authorization form and the Confidentiality Agreement.

|

CALIFORNIA STATE UNIVERSITY, DOMINGUEZ HILLS

CONFIDENTIAL INFORMATION ACCESS AND COMPLIANCE AGREEMENT

I certify that I have received information related to University policies that govern access to and use of confidential information. I understand that I am being granted access to information based on my agreement to comply with the following items and conditions:

- I will comply with state and federal laws and University policies that govern access to and the use of confidential information.
- My right to access information and/or data is strictly limited to the specific information and data that is relevant for me to perform my service as a staff member in University Advancement.
- I am prohibited from accessing information or data that is not relevant and necessary for me to perform my job-related duties.
- I will be a responsible user of confidential information and data related to the University.
- I will store confidential information and data that I obtain under secure conditions.
- I will maintain the privacy and confidentiality of the information I obtain.
- Before sharing confidential information or data with others, electronically or otherwise, I will ensure that the recipient is authorized to receive that confidential information and understands his/her responsibilities as a user.
- I will log off/close an electronic program or files that contains confidential information when I am not using it.
- I will keep passwords to myself and will not disclose them to others unless my supervisor authorizes such disclosure in writing.
- I will store and secure confidential information, data, reports, etc. in a manner that will maintain their confidentiality when I am not using them.
- I will dispose of confidential information in a manner that will preserve their confidentiality when I have finished using them.

I understand that if I misuse confidential information or data that I obtain through my employment, I will be subject to disciplinary action up to and including termination.

I certify that I have read this Confidentiality and Compliance Agreement, I understand it, and I agree to comply with its terms and conditions.

PRINTED NAME

SIGNATURE

TITLE

DATE