

Policies of The University of North Texas at Dallas	Chapter 5.000
5.013 Protection of Confidential Information and Privacy Act Policy	Human Resources

Policy Statement. The University of North Texas at Dallas makes every effort to protect confidential information from improper disclosure. Such confidential information includes, but is not limited to, social security numbers, educational records as defined by the Family Educational Rights and Privacy Act (FERPA), protected health information as defined by the Health Insurance Portability and Accountability Act (HIPAA), and customer information as defined by the Gramm-Leach-Bliley Act (GLB Act). This policy provides guidance for notifying individuals of their right to be informed about, to obtain, and to correct information collected about them. This policy does not apply to individuals who wish to obtain or correct information in their educational records and does not authorize expunction of law enforcement records.

Application of Policy. This policy applies to all employees.

Definitions.

1. **Public Information.** “Public Information” means information that is collected, assembled, or maintained under a law or ordinance or in connection with the transaction of official business by the University or on behalf of the University who owns the information or has a right of access to it. The general forms in which public information may exist include, but are not limited to, book, paper, letter, document, printout, photograph, film, tape, microfiche, microfilm, Photostat, sound recording, map and drawing, and other data which may be held in computer memory such as electronic data or voice data or video presentation.

Procedures and Responsibilities.

1. **General Provisions.** The University shall issue guidelines with regard to the use of social security numbers, educational records, health care information, customer information, and other confidential information. The guidelines will be issued to help ensure that:
 - i. the release, use, display, transmission, and retention of social security numbers are only allowed if permitted by law;
 - ii. information that is considered an educational record, as defined by FERPA, will be disclosed to someone other than the student only as authorized by law and the University FERPA policy;
 - iii. the use, receipt, or transmission of an individual’s protected health

information, as defined by HIPAA, is allowed only as permitted by law;

- iv. customer information, as defined by the GLB Act including financial information, which is collected or maintained, will be safeguarded as required by law;
- v. the use and/or release of any other information determined by the President and the UNT System Office of General Counsel to be confidential are allowed only as required by and consistent with applicable law; and
- vi. no employee may disclose confidential information obtained in the course of performing his or her official duties in any manner except as established in these guidelines, by law or university policy.

Responsible Party: President and Office of General Counsel

2. **Notice About Information Laws and Practices.** Each department that collects information about an individual by means of a form in a paper format or an electronic format shall prominently state on the paper or electronic form and on the Internet site, that the individual is entitled to:
 - i. be informed of the information the department collects about the individual, on request, unless the information is exempt from disclosure under federal or state law;
 - ii. receive and review the information; and
 - iii. have the University correct information about the individual that is incorrect.

Responsible Party: Department heads

3. **Mandatory Notice on Internet Sites.** Each department that collects information about an individual by means of an Internet site or that collects information about the computer network location or identity of a user of the Internet site shall prominently post on the Internet site what information is being collected through the site about the individual or about the computer network location or identity of a user of the site, including what information is being collected by means that are not obvious. All University web sites must provide a privacy statement which identifies the information collected from site visitors, describe its use, and assure site visitors of the integrity of their information during transmission and storage.

Responsible Party: Department heads

4. **Correction of Incorrect Information.** An individual who believes the University possesses incorrect information about him or her in a record covered by this policy may request to have the University correct the information he or she believes is incorrect. A student who wishes to correct information in an educational record may do so pursuant to the University's FERPA policy. The University may not charge a fee to correct information collected about an individual. The following procedures apply to the correction of incorrect information covered under this policy.

i. **Requests to correct information.**

- a) Requests to correct personnel information shall be submitted to the Human Resources Department.
- b) Requests to correct traffic and parking information shall be submitted to the University police department.
- c) Requests to correct all other information shall be submitted to the Office of General Counsel.
- d) All requests must be in writing, specify the information the Individual believes is incorrect and provide an explanation documenting why the information is incorrect and providing the correct information.

ii. The individual will be informed in writing whether the request to correct information is granted. If the request is granted, the appropriate records will be amended. If the request is denied, the information submitted by the individual will be made a part of the University record. Additionally, the individual may submit new information he or she wishes to include in the record that reasonably explains why he or she believes the information is incorrect.

Responsible Party: Human Resources, Police Department and Office of General Counsel

References and Cross-references.

Texas Government Code § 552.002

Texas Government Code §§ 559.003-559.005

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