INFORMATION PRIVACY STANDARD
Privacy of Personal Information

Procedure Contents	
• **Related Policy**	**Effective Date:** April 14, 2020
• **Purpose**	**Last Updated:**
• **Applicability**	**Responsible University Officer:**
• **Privacy Standard**	VP Technology/CIO
• **Related Information**	**Owner:**
	Chief Information Privacy Officer
	Contact:
	Howard Loos

RELATED POLICY: [Information Security and Appropriate Use](#)

Purpose

The University is committed to protecting the privacy of the personal information of its students, faculty, and staff within its control in a manner consistent with applicable laws, regulations, and University policies. To help achieve this, the University has adopted a "privacy by default" model. Consideration for business effectiveness and efficiency must be carefully weighed against increased privacy restrictions.

This standard provides guidance on the appropriate collection and use of personal information, including the use of personal information in public directories and websites, to ensure privacy objectives are achieved.

For additional information or questions, contact the BYU Data Privacy Officer (privacy@byu.edu).

Applicability

This standard applies to all university departments, faculty, staff, employees, consultants, and third party service providers. If non-public personal information is to be accessed or shared with third parties, they should be bound by contract to abide by the University's Information Security and Appropriate Use Policy.

Privacy Standard

Personal information should only be obtained through lawful means. In general, personal information is not to be made available to the public nor shared with outside organizations without a lawful basis or the opt-in consent of the data subject. Appropriate standards and procedures should be implemented to ensure

- the purpose for collecting personal information is described at the time it is collected and is not used for secondary purposes;
- only personal information required to perform the necessary business purpose is collected and it is securely disposed or de-identified when no longer needed;
- personal information is accurate, complete, and relevant to the purposes for which it was collected. Except as required by law, individuals should be allowed to inspect, correct and/or remove their personal information in a reasonable timeframe;
- access to personal information is limited to those employees with a specific need to access the information to accomplish the functions of their respective jobs;
- personal Information is protected by reasonable security safeguards against reasonably anticipated risks, such as loss, unauthorized access, destruction, use, modification, or disclosure;
- data breaches of personal information is reported without undue delay;

- personal information is not shared with outside organizations unless a data sharing agreement is in place; and
- vendors can demonstrate compliance with processing obligations by providing proper documentation to BYU or a supervisory authority upon request.

Public Directory Information
- **Faculty/Employees** – by default, limit personal information of faculty and employees to what is necessary for people inside and outside of BYU to make contact, including potential, current and prior students, faculty and employees. By default, the public directory should display name, title, department and the department's main address, phone number and email address, with an easy way for faculty and employees to opt-in to display additional personal information, including individual office address, phone number and email address, as well as their home address and phone number, in case they want to be found more easily.

- **Students** – Our public directory should not display any student information. Student information should only be made available behind our general login, only available to active faculty, employees and students.

BYU Campus Community Directory for Current Students, Faculty and Employees
The BYU Campus Community Directory is to be classified as "Internal" and only visible to current students, faculty (including adjunct faculty), employees, and contractors with an appropriate role and logged in through BYU's Central Authentication System (CAS).

- **Students** – student directory information will be unlisted (only the student's name will be visible by other students) *by default*. Students will need to opt-in to display their personal contact information in the campus community directory to other students, with options for what information to display. Unlisted student records will not be available to third parties, but will still be visible to current faculty/employees.

- **Restricted student records** – Students should have the option to restrict their records, making their personal information, including name, unavailable to the general campus community and third parties. Restricted records will continue to be made available to managers/leaders with a legitimate educational interest. Students will need to interact with the Registrar's Office to restrict their records.

- **Faculty/Employees** – name, picture, work email address, department, office address and phone number should be made available by default, with no ability to opt-out. Opting out of any of these fields would make it difficult for faculty/employees to work with one another. Faculty/Employees should have the ability to opt-in to display home address and personal phone number/cell phone.

- **Restricted faculty/employee records** – Faculty and employees should not have the ability to restrict their records from the community directory. When taking classes, faculty/employee directory information will default to showing only their work information if they have done a "FERPA" restriction through the Registrar's Office.

- **Student Employees** – Students requiring access to community directory information for their work assignments may receive appropriate access by first completing the official campus FERPA training, and then having their full-time supervisor request access. When approved, these students will have access to the same directory information as Faculty/Employees.

Public Department Websites

Departments may provide public access to department information on BYU department websites, including a listing of faculty, with contact information limited to name, photo, title, office address/phone, and work email address. However, the default should be work address, phone, and email of the department and not of the faculty/employee. Faculty/employees should have the right to choose whether their work contact information displays on the public department sites or whether the department's main address, email and phone display on the website.

No student or student employee personal data should be listed on the public area of department websites without prior student consent.

Printed Directories

Printed directories, such as the BYU Telephone Directory, should be restricted for campus use and should follow the same rules as the BYU Campus Community Directory above. Printed directories should be labeled as "Internal Use Only" and securely disposed of when no longer needed.

Related Information

- [Information Governance Standards and Procedures](#)
- [Information Security Standards and Procedures](#)