

# Asheville-Buncombe Technical Community College (A-B Tech) Policy Manual

## Policy 1009: Information Security Program

It is the policy of the Board of Trustees to implement and maintain a comprehensive, written Information Security Program (“ISP”), as is required by the Gramm-Leach-Bliley Act (“GLBA”) (15 U.S. Code §6801) and its implementing regulations. The ISP shall put forth procedures that address the security, integrity, and confidentiality of data encompassed by the definition of “covered information,” below.

## Scope

This policy applies to all A-B Tech employees that collect, access, maintain, distribute, process, protect, store, use, transmit, dispose of, or otherwise handle covered information.

## Definitions

*Covered Information*: For the purpose of the ISP, *covered information* includes *student financial information* (defined below). *Covered Information* includes both paper and electronic records.

*Student Financial Information:* Information that A-B Tech has obtained from a *customer* (defined below) in the process of offering a financial product or service, or such information provided to A-B Tech by another financial institution. Offering a financial product or service includes offering student loans to students, receiving income tax information from a student's parent(s) when offering a financial aid package, and other miscellaneous financial services. Examples include *customer* identifying information, such as addresses, phone numbers, bank and credit card account numbers, income and credit histories, and Social Security numbers, in both paper and electronic format.

*Customer:* Any student, student’s parent(s) or spouse, a College employee, alumnus, or any other third party who has paid for, or received, a financial product or service from A-B Tech.

## References

A-B Tech Policy 813: Privacy of Student Records

16 Code of Federal Regulations Part 314

67 Federal Register 36483 – PART 314: STANDARDS FOR SAFEGUARDING CUSTOMER INFORMATION. [§314.3 Standards for safeguarding customer information](https://www.gpo.gov/fdsys/pkg/FR-2002-05-23/pdf/02-12952.pdf#page=11).

Approved by the Executive Leadership Team on November 13, 2019

Approved by the College Attorney on November 25, 2019

## Policy Owner

Vice President of Operations/Chief Information Officer, Ext. 7900

See Information Security Program Procedure

Approved by the Board of Trustees on December 2, 2019