

## **DEPARTMENT OF HUMAN GENETICS 01-08**

**CATEGORY:** SUPPORT SERVICES  
**SECTION:** Computing, Information, and Data  
**SUBJECT:** Confidential Data Policy  
**EFFECTIVE DATE:** April 10, 2015 Revised  
**PAGE(S):** 2

### **I. SCOPE**

This policy is intended to protect confidential information.

This policy applies to all laptop and desktop computer users. Every user of Department computer resources is expected to know and follow this policy.

### **II. POLICY**

The following types of information should never be saved on the Department servers or workstations.

The following data elements require the highest level of protection. This list may expand based on future regulatory requirements. This list is not to be construed as a comprehensive list. Other data may also require similar protections.

Data that is regulated by Federal or State laws including but not limited to:

1. Family Rights and Privacy Act (FERPA)
2. Health Insurance Portability and Accountability Act (HIPAA)
3. Electronic Communications Privacy Act (ECPA)
4. Gramm-Leach-Bliley Act (GLBA)
5. Children's Online Privacy Protection Act (COPPA)
6. Freedom of Information Action (FOIA)
7. Connecticut Personal Data Act
8. Federal Trade Commission (FTC) Red Flag Rule (Identity Theft Regulation) or other relevant University policies or procedures.

SSN and Other Personally Identifiable Information:

1. Name (First name or initial and Last name), when stored or displayed with one or more of the other listed data elements
2. Social Security Number
3. Driver's license number
4. State identification card number
5. Financial account numbers such as credit, debit, or bank account numbers
6. Passport number
7. Alien registration number
8. Health insurance identification number

(Individual) Student University Records:

1. Grades/Transcripts/Test scores
2. Courses taken/Schedule
3. Advising records
4. Educational services received
5. Disciplinary actions
6. Student Financial Aid, Grants, and Loans
7. Financial account and payment information including billing statements, bank account and credit card information
8. Admissions and recruiting information including test scores, high school grade point average, high school class rank, etc.
9. Student Personnel records

Personal Health Information:

1. Information that identifies the individual, or could reasonably be used to identify the individual, including, but not limited to name, addresses, telephone/fax number, medical record number, telephone number, birthday, admission/discharge date, vehicle ID and serial number, device IDs and serial number, certificate/license numbers, biometric identifiers, full-face images, other unique identifying number/characteristic/code.
2. Information about the patient's past, present or future physical or mental health or condition
3. Information relating to the provision of, or payment for, health care

Financial Data:

1. Employee financial account information
2. Student financial account information – aid/grants/bills (covered under FERPA)
3. Individual financial information
4. Business partner and vendor financial account information

**Prevention**

The IT Department will actively look for information that violates this policy. Identity Finder, which is provided by Pitt, will be preinstalled or installed via Group Policy on all Department computers. Each user is expected to periodically run Identity Finder to verify that there is no identifiable data on their machine.

In the event that such data is found, the user will be required to remove the data from the file, delete the file, or follow the Storage Exception as described below.

**Storage Exception**

If any data that is considered to be confidential must be stored, then the data will need to be encrypted using either FileVault or Truecrypt, or an equivalent software. This will ensure the security of the data. Also, if it stored on laptop, it will be required to have Computrace installed for theft recovery.

This policy will not supersede any University of Pittsburgh developed policies but may introduce more stringent requirements than the University policy.