

HOFSTRA UNIVERSITY

INFORMATION SECURITY PROGRAM

Overview: In order to protect non-public personal information and data, and to comply with federal law, including the Gramm-Leach-Bliley Act, the University has implemented certain practices in the University information environment and institutional information security procedures. The goals of this Information Security Program (“Program”) are to:

- (1) Ensure the security and confidentiality of nonpublic financial information;
- (2) Protect against any anticipated threats or hazards to the security or integrity of such information; and
- (3) Protect against unauthorized access to or use of such information that could result in substantial harm or inconvenience to members of the University community.

In addition to this Program, the University’s FERPA Policy, Acceptable Use Policy, and the University’s Confidentiality Agreement & Security Policy are all incorporated by reference into this Program.

Designation of Coordinator: The University’s Vice President for Digital Innovation and Technology is designated as the individual who will coordinate and oversee the Program (“Coordinator”). The Coordinator may designate other representatives of the University to oversee and coordinate particular elements of the Program; references to the Coordinator in this document will refer to the Coordinator or his/her designees. Any questions regarding the implementation of this Program should be directed to the Coordinator.

Scope of Program: The Program applies to any record containing nonpublic financial information about a student or other individual who has a relationship with the University, whether in paper, electronic or other form, that is handled or maintained by or on behalf of the University. For these purposes, the term nonpublic financial information shall mean any information (i) a student or other individual provides in order to obtain a financial service or product from the University, (ii) about a student or other individual resulting from any transaction with the University involving a financial service or product, or (iii) otherwise obtained about a student or other individual in connection with providing a financial service or product to that person. Financial products and services include lending funds, collecting loan payments, and facilitating the process of applying for financial aid.

ELEMENTS OF THE PROGRAM:

1. Risk Identification and Assessment. The University intends through this Program to identify reasonably foreseeable internal and external risks to the security, confidentiality, and integrity of nonpublic financial information that could result in the unauthorized disclosure, misuse, alteration, destruction or other compromise of such information. The Coordinator will lead the risk assessment and will work with appropriate personnel in departments with access to nonpublic financial information to identify and assess risks in relevant areas, including:

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- (1) Employee training and management;
- (2) Information systems, including network and software design, as well as information processing, storage, transmission and disposal; and
- (3) Detecting, preventing and responding to attacks, intrusions, or other systems failures.

The risk assessment will also include an assessment of safeguards in place to control these risks.

2. **Designing and Implementing Safeguards.** The Coordinator will work with relevant University departments to design and implement information safeguards, as needed, to control the risks identified in assessments. The Coordinator will also work with departments as necessary to regularly test or otherwise monitor the effectiveness of such safeguards' key controls, systems, and procedures.
3. **Overseeing Service Providers.** The Coordinator will work with relevant departments and the Office of General Counsel to take reasonable steps to select and retain service providers that are capable of maintaining appropriate safeguards for the nonpublic personal information, and to require service providers by contract to implement and maintain such safeguards.

Evaluation and Adjustment of Program. The Coordinator will work with individual departments throughout the University to monitor, evaluate and adjust this Program in light of the results of the testing and monitoring described above, any material changes to operations or business arrangements, technology changes, emerging vulnerabilities and threats and any other relevant factors that may have an impact on the security or integrity of nonpublic financial information.

HU Doc # 13241