



Office of Risk Management & Compliance

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To: Jackie Huntoon, Provost and
Senior Vice President for Academic Affairs

Date: January 21, 2019

From: Janet Hayden, CRM, CSRM 
Executive Director of Risk Management
& Compliance

Subject: Privacy Policy

CC: D. Reed, J. Seppala, J. Olson,
D. Hale, T. Jacques

One of the requirements of the General Data Protection Regulation (GDPR) is that we need to change our Privacy Policy to reflect GDPR requirements, which are to keep EU citizens informed of how we collect, use, share, secure and process their personal data.

Currently, Michigan Tech does not have a Privacy Policy or Privacy Statement. The Compliance Partners Working Group (CPWG) has developed the attached privacy policy for consideration. The proposed privacy policy does not change our current practice, but allows us to be in compliance by publishing for the general public (regardless of where they are from) what we do with the personal data that we collect.

In addition, we have also been informed that Google has pulled Michigan Tech's App (which allows students to see their class schedules, computer lab status, academic calendars, etc.) from the Google App Store as a result of us not having a published privacy statement.

As I'm not sure what the current process is for creating a University policy, I would like to suggest that the attached proposed Privacy Policy (with accompanying Privacy Statement) be adopted as University policy under the Provost's Office and maintained by IT.

Let me know if you have any questions, or need any additional information.



Form 1.01.1.2 Policy Template

Once the template is complete, electronically forward to policy@mtu.edu.

Policy Number:	<i>(Will be assigned by policy coordinator)</i>
Title:	Privacy Policy
Effective:	<i>(Effective Date of Policy, ex: MM/DD/YYYY)</i> [Enter your text here. Required.]
Senate Proposal:	No
Responsible University Officer:	Provost and Senior Vice President for Academic Affairs
Responsible Office:	Information Technology

Policy Statement

Michigan Technological University strives to comply with state, federal, and international laws and regulations. The University believes that data collected is necessary to fulfill our mission and service offerings and does so lawfully.

Policy Requirements

Michigan Technological University is committed to protecting your information and privacy and only uses the supplied information in pursuit of providing an exemplary education and to improve the services that we offer. Information is retained for a period set by applicable regulations and University policy.

Purpose

Information supplied to Michigan Tech is not shared with unrelated third parties. Individually identifiable information may be shared with parties outside of the University when there is a need to do so in pursuit of our academic mission. For example businesses that process data for the University, federal agencies related to education, or companies that provide emergency notification services. The University may share aggregated, non-identifiable information to outside agencies for research related to education. The University will not otherwise sell or trade an individual's information. We may release personal information to appropriate agencies when legally required to do so. Additionally, directory information as defined by the Family Educational Rights and Privacy Act (FERPA) may be provided to outside agencies as required.

Individuals have the right to review a copy of the personally identifiable information that we store about them and to request corrections to any data that may be found to be in error. They also have the right to request that their data be expunged when there is no longer a legitimate need by the University to maintain the data.

Scope

Michigan Tech may collect personal information from a variety of sources including, but not limited to, from individuals directly when they fill out an application or other forms, logs from their usage of our services, and information generated as a result of their affiliation with the University.

Related Policy Information

Michigan Technological University Privacy Statement

Exclusions

None

Contacts

David Hale Chief Information Security Officer Information Technology	487-1727
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Theresa Jacques Registrar Academic Affairs	487-2936
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Definitions

None

Responsibilities

David Hale, Chief Information Security Officer, Information Technology – Responsible for data integrity.

Theresa Jacques, Registrar, Academic Affairs – Responsible for personal data and use.

Procedures

None

Forms

None

Appendices

None

History

Adopted: mm/dd/yyyy Approved by appropriate executive team member
Revised: mm/dd/yyyy Brief description of changes made.

MICHIGAN TECHNOLOGICAL UNIVERSITY

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If you have any questions or concerns about your personal data and its use, please contact us at privacy@mtu.edu. You can also contact us at Registrar's Office, Michigan Technological University, 1400 Townsend Drive, Houghton, MI 49931.