



**THE GEORGE
WASHINGTON
UNIVERSITY**
WASHINGTON, DC

Responsible University Official:
Executive Vice President and Chief
Financial Officer
Responsible Office: Compliance Office
Last Revised Date: September 12, 2018

PERSONAL INFORMATION AND PRIVACY POLICY

Policy Statement

The university is committed to maintaining the privacy of personal information. Throughout the performance of university operations, the university will safeguard the generation, collection, use, storage, disposal, and disclosure of personal information in accordance with best practices and as required by applicable laws and regulations. The responsibility for the protection of personal information is shared by all persons who process such information on behalf of the university.

Reason for Policy

To promote compliance with the requirements of privacy laws and regulations, including the Family Educational Rights and Privacy Act (FERPA), Gramm-Leach-Bliley Act (GLBA), and the General Data Protection Regulation (GDPR); and to advise university faculty, staff, and students of the community's responsibilities with respect to privacy and protection of personal information.

Who is Governed by this Policy

Students, faculty, staff, contractors, and any persons or entities who generate, collect, use, store, or process personal information on behalf of the university.

Policy

Information plays a critical role in the university's educational, research, administrative, and public service activities. The university recognizes the importance of safeguarding personal information, in all formats, that is processed or shared within the university and with third parties on its behalf.

Collection of Personal Information

All university offices, contractors, and others that collect personal information on behalf of the university (each a “data collector”) are responsible for collecting only the minimum amount of such information necessary. Collecting no more information than is necessary minimizes the information that the university must secure and hold private. When collecting personal information from individuals, the following is required:

- a. Transparency: the data collector must inform the individual what information is being collected (both actively and passively).
- b. Lawful Basis: the data collector must establish a lawful basis for the collection of personal information. This may include obtaining consent, collection of information necessary to perform under a contract, a legal obligation, vital interest, public task, or a legitimate interest.
- c. Adherence with policies: any information that is collected through a university webpage (gwu.edu), regardless of where it is hosted, must adhere to the [website privacy policy](#). This applies to third parties that host marketing web pages on behalf of university academic programs.

Use of Personal Information

Personal information that is collected from an individual remains the property of that individual. Accordingly, any university office, contractor, or other persons or entities using or processing (each a “data processor”) personal information on behalf of the university is required to do the following:

- a. Notice: the data processor must provide a notice detailing how information will be used and whom to contact with any questions or concerns.
- b. Non-Public Information: the data processor using information collected on behalf of the university is prohibited from selling, sharing, or publicizing personal information. Personal information is to remain private and is considered “Non-Public Information,” as defined under the [Information Security Policy](#).
- c. Disposal: the data processor must securely dispose of all personal information, in any form, after the period of time specified in the [Records Management Policy](#) or as otherwise mandated by contract.

Additional requirements may apply to data collectors and/or to data processors.

Reports of suspected misconduct or violations of law or university policies should be made to the Office of Compliance by calling its 24-hour Regulatory Compliance Help and Referral Line (1-888-508-5275), sending an email to comply@gwu.edu or submitting online at <https://compliance.gwu.edu/>. Reports of suspected or actual breaches involving personal information should be made to the IT Support

Center by calling 202-994-4948 or sending an email to incident@gwu.edu. If necessary, incident response procedures will be initiated which may ultimately include notifying appropriate parties.

Definitions

Personal Information is any information that relates to an **identified or identifiable living individual**. Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data. Refer to Protecting Information: Guide for more information.

Data Collector is the principal party responsible for determining what personal information is to be collected, establishing lawful basis for collection, and managing the information, even if such information is being used by a data processor. Data collectors are held responsible for personal information protection.

Data Processor is the party that is processing personal information on behalf of the data controller. The data processor shall provide sufficient guarantees to implement appropriate measures to ensure the protection of the personal information. Data processors may be held responsible for personal information protection.

Related Information

[Health Information Privacy Policy](#)

[Privacy of Student Records \(FERPA\)](#)

[Records Management](#)

[University Records Schedule](#)

[Information Security Policy](#)

[GW Web Content Policy](#)

[Social Media Policy](#)

[Telephone/Wireless Communication Usage Policy](#)

[Acceptable Use for Computing Systems and Services](#)

Contacts

Contact	Telephone	Email
Compliance Office	(202) 994-3386	comply@gwu.edu

Information Security and Compliance Services		infosec@gwu.edu
Office of the Senior Vice President and General Counsel	(202) 994-6503	gwlegal@gwu.edu

Document History

- **Last Reviewed Date:** 9/12/2018
- **Last Revised Date:** 9/15/2010
- **Policy Origination Date:** 9/1/2004 (as the Privacy Policy Statement)

Who Approved This Policy

Mark Diaz, Executive Vice President and Chief Financial Officer
Forrest Maltzman, Provost and Executive Vice President for Academic Affairs
Beth Nolan, Senior Vice President and General Counsel

This policy, as well as [university policies](#), are located on the [Compliance Office's](#) home page.