SAFEGUARDING SENSITIVE PERSONALLY IDENTIFIABLE INFORMATION

Revised 2023

Abstract

A guide to identify and protect personally identifiable information (PII) at Oklahoma City University.

Oklahoma City University

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Introduction

As someone who works for or on behalf of Oklahoma City University (OCU or University), it is your responsibility to protect information that has been entrusted to the University. An important part of this duty is to ensure that you properly collect, access, use, share, and dispose of Personally Identifiable Information (PII).

You should exercise care when handling all PII. Sensitive PII, however, requires special handling because of the increased risk of harm to an individual if it is compromised.

This document provides minimum standards that apply to every OCU employee, contractor, intern, and consultant. Your department head, the system owner, or others responsible for the security of PII data may set additional or more specific rules for handling PII based on the sensitivity of the information involved.

This document explains:

- How to identify PII and Sensitive PII,
- How to protect Sensitive PII in different contexts and formats, and
- What to do if you believe Sensitive PII has been compromised.

This document was adapted and largely duplicated from the Department of Homeland Security's document titled *Handbook for Safeguarding Sensitive Personally Identifiable Information (March 2012).*

1.0 The difference between PII and Sensitive PII

The Department of Homeland Security and the Department of Education defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual.

Sensitive PII is Personally Identifiable Information, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual.

Sensitive PII requires stricter handling guidelines because of the increased risk to an individual if the data are compromised.

Some categories of PII are sensitive as stand-alone data elements. Examples include social security number, driver's license number, passport number, or financial account number. Other data elements such as immigration status, medical information, ethnic, religious, sexual orientation, school grades, and account passwords, in conjunction with the identity of the individual (directly or indirectly inferred), are also Sensitive PII.

1.1 PII that is always Sensitive

What is PII?	
PII includes: Name, email, home address, phone number	
Sensitive PII includes:	
If stand-alone:	**If paired with another identifier:**
Social Security Number	Medical information
Driver's license or state ID number	Ethnic or religious affiliation
Passport number	Sexual orientation
Alien registration number	Account passwords
Financial account number	Last 4 digits of SSN
	Date of birth
	Criminal history
	Mother's maiden name
	Banner ID number

1.2 PII that is Sensitive in certain contexts

Context matters. PII that might not include the data elements identified in 1.1 may still be sensitive and require special handling if it could cause substantial harm, embarrassment, inconvenience, or unfairness to an individual.

For example, a collection of names:

- Is **not** Sensitive PII if it is a list, file, query result, etc. of:
    - Attendees at a public meeting

    - Members of a university committee or group
    - Employees and students in the Campus Directory
- **Is** Sensitive PII if it is a list, file, query result, etc. of:
    - Students with their grades
    - Employees with poor performance ratings
    - Students on academic probation

2.0 Safeguarding Sensitive PII

You should exercise care when handling all PII. Sensitive PII, however, requires special handling because of the increased risk of harm to an individual if it is compromised. The following guidelines explain how you must properly collect, access, use, share, and dispose of Sensitive PII at the University.

2.1 Collect Sensitive PII only as authorized

When collecting Sensitive PII, be sure that you have the University's authority to do so. You may be required to attend ongoing data security training, sign a policy signifying your understanding and commitment to following University defined practices for data security, obtain an official sign-off to access sensitive data, and/or other practices.

Other agencies may require the University follow certain guidelines and regulations related to particular Sensitive PII. You should ensure you understand these requirements and follow the appropriate practices. Some examples include:

- If you are collecting or maintaining student information considered Sensitive PII, ensure you are following all guidelines and regulations outlined by the Family Educational Rights and Privacy Act (FERPA).
- If you are collecting or maintaining medical information for individuals, ensure you are following all guidelines and regulations outlined by the Health Insurance Portability and Accountability Act (HIPAA).

When collecting PII from members of the public, ensure that all paper or electronic forms or processes are reviewed and approved by your supervisor prior to collection.

2.2 Limit use of Sensitive PII

Only access or use Sensitive PII when you have a need to know that information as it relates to your official duties. If you are unsure about whether a specific use is appropriate, you should confirm with your supervisor.

If you are a contractor or other 3rd party to the University, you may be required to provide a nondisclosure agreement and other documentation stating your understanding and responsibilities prior to handling Sensitive PII.

Never browse files containing Sensitive PII out of curiosity or for personal reasons.

2.3 Minimize proliferation of Sensitive PII

Minimizing proliferation of Sensitive PII helps to keep it more secure and reduces the risk of a privacy incident.

Refer requests for Sensitive PII from members of the media to the University's Communications and Marketing department.

Limit the sharing of Sensitive PII:

You are authorized to share Sensitive PII internally with other University employees or contractors, or externally with outside entities, only if the recipient's need for the information is related to his or her official duties. Formal authorization may be required before these recipients access Sensitive PII.

Creating data extracts of Sensitive PII:

Do not create unnecessary or duplicative collections of Sensitive PII, such as duplicate, ancillary, "shadow," or "under the radar" files. In some instances, it may be appropriate to create new spreadsheets or databases that contain Sensitive PII from a larger file or database. Before doing so, consult your supervisor and ensure you are following all designated minimum requirements to secure the data. When you need to print, copy, or extract Sensitive PII from a larger data set, limit the new data set to include only the specific data elements you need to perform the task at hand. Additionally, if you need to create duplicate copies of Sensitive PII to perform a particular task or project, delete or destroy them when they are no longer needed.

2.4 Secure Sensitive PII

When you handle, process, transmit, transport and/or store Sensitive PII, you should limit the potential for unauthorized disclosure. For example, protect against "shoulder surfing" or eavesdropping by being aware of your surroundings when processing or discussion Sensitive PII.

PII in electronic form:

Sensitive PII should only be accessed via University-approved portable electronic devices (PEDs) such as laptops, USB flash drives, and external hard drives. PEDs must be encrypted when storing Sensitive PII. Personally-owned USB flash drives or other external storage devices may not be used.

Personally owned devices should not be used to save, store, or host Sensitive PII. Sensitive PII stored in University approved cloud storage locations such as the University's Microsoft Teams, SharePoint, or OneDrive, may be accessed by a personal device as long as the data is not copied or downloaded to the personal device. When authorized by your supervisor and approved through Campus Technology Services (CTS), you may access Sensitive PII stored on your University desktop computer or University file share remotely via a virtual private network (VPN). This data must not be moved or copied from these University locations to your personal computing device.

Transporting hard copy PII:

Obtain authorization from your supervisor before removing documents containing Sensitive PII from the workplace. Do not take Sensitive PII home or to any non-University approved worksite, in either paper

or electronic format, unless appropriately secured. Paper documents must be under the control of the employee or locked in a secure container when not in use.

Physically secure Sensitive PII when in transit.

- Do not mail or courier Sensitive PII on CDs, DVDs, hard drives, USB flash drives, or other removable media unless the data are encrypted. See Appendix E to encrypt a flash drive.
- Do not pack laptops or electronic storage devices in checked baggage or leave them in a car for an extended period of time.
- Do not leave paper files or electronic devices in plain sight in an unattended vehicle.
- Do not return failed hard drives to vendors for warranty repair or replacement if the device was ever used to store Sensitive PII. These devices should be returned to CTS for proper handling.

Hard copy PII in the workplace:

Never leave Sensitive PII in hard copy unattended and unsecured.

Physically secure Sensitive PII (e.g. in a locked drawer, cabinet, desk, or safe) when not in use or not otherwise under the control of a person with a need to know. Sensitive PII may be stored in a space where access control measures are employed to prevent unauthorized access by members of the public or other persons without a need to know (e.g. a locked room or floor, or other space where access is controlled by a guard or card reader). But the use of such measures is not a substitute of physically securing Sensitive PII in a locked container when not in use.

Try not to send Sensitive PII using a fax machine. If possible, scan and then encrypt the document(s) and email it. If the information must be sent by fax, do not send Sensitive PII to a fax machine without contacting the recipient to arrange for its receipt.

Emailing PII:

Within OCU: Avoid sending Sensitive PII in the body of your emails whenever possible. While email traffic between University email accounts is secure, maintaining control over where an email might be forwarded or otherwise accessed is a risk. Ideally, store Sensitive PII in University approved cloud storage locations and provide access to these files to others as required (see Appendix B). When email is required for sharing Sensitive PII, ensure the file is properly encrypted and the email message itself it further secured to limit access (see Appendix D).

Outside of OCU: Always attempt to share from a University approved cloud storage location whenever possible (see Appendix B). When that is not possible and you are authorized and required to email Sensitive PII to an external recipient: send the PII in an encrypted email attachment (see Appendix D). Do not send Sensitive PII in the body of the email message with external recipients.

Storing PII in shared storage locations:

You may store Sensitive PII in a University approved cloud storage (Teams, SharePoint, OneDrive) or on shared access network drive ("shared drive"), only if access is restricted to those with a need to know. Consult with CTS for the processes to properly control access to a Microsoft cloud location or a network shared drive folder. See Appendix B for more information.

3.0 Privacy Incident Reporting

The University defines a **privacy incident** as the loss of control, compromise, unauthorized disclosure, unauthorized acquisition, unauthorized access, or any similar term referring to situations where persons, other than authorized users and for an authorized purpose, have access or potential access to PII in usable form, whether physical or electronic. The term encompasses both **suspected and confirmed incidents**, whether intentional or inadvertent, involving PII which raise a reasonable risk of harm.

3.1 How to report a privacy incident

- You must report all privacy incidents, whether suspected or confirmed, to your supervisor immediately. If your supervisor is unavailable, or if there is a potential conflict of interest, report the incident to the University's Risk Manager, Chief Information Officer, or General Counsel.
- Document or maintain records of information and actions relevant to the incident, as they may be required in the privacy incident handling report.
- Any alleged violations that may constitute criminal misconduct, identity theft or other serious misconduct, or reflect systemic violations within the University, will be reported to the University's Risk Manager and General Counsel as part of the privacy incident reporting process.

3.2 Do not further compromise the information

Beware of these common mistakes so that your response to a privacy incident does not cause another incident:

- Do not forward compromised information (e.g. SSN, full name, birth date, etc.) when reporting an incident.
- If and when the compromised Sensitive PII is needed by your supervisor, Risk Manager, Chief Information Officer, or General Counsel in order to respond to an incident, you will be given instructions regarding the individual to send it to.
- If you see Sensitive PII in an email that you suspect constitutes a privacy incident, remember that the information is duplicated and further compromised if you forward or reply to it.

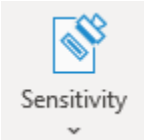
For more details related to privacy incident reporting, reference the University's *Data and Network Security Policy*.

Appendix A: Assigning Sensitivity Labels with Office 365

When creating emails or files using the web or app version of Microsoft Office 365 tools (Outlook, Word, Excel, PowerPoint), you should enforce encryption and restrictions to these items through the use of "Sensitivity Labels" when these items contain Sensitive PII.

Applying a Sensitivity Label is straightforward. While creating or updating a file or email using an Office 365 app:

- Choose the Home tab on the ribbon bar.
- Find the Sensitivity button.



- Choose the Sensitivity Label from the list provided which will ensure the appropriate level of security for the data contained.

The Sensitivity Label can help control who can access the file or email, whether or not a recipient can share it with others, and can ensure it is encrypted.

Note that Sensitivity Labels may not be available in older versions of Microsoft Office. In such cases, you should use other means to ensure the protection of these emails and files when they contain Sensitive PII.

Appendix B: Safely storing and sharing files

With few exceptions, files containing Sensitive PII should be stored in the University's Microsoft 365 cloud environment. OneDrive, Teams and SharePoint are the authorized cloud storage locations for the University. Each meets the security requirement for encrypted storage and provides many other benefits over standard network shares or storing on local devices. Also, when needing to share a sensitive or confidential file with others, doing so through these cloud services is much more secure than sharing copies of files through email attachments. This allows you to send links via email to the files where they are stored in the cloud rather than transmitting copies of the files, allowing you to maintain better control of who can access these sensitive files.

Files primarily for your own use or that will be shared with a small audience should be stored in your University OneDrive. OneDrive can be accessed through a web browser at https://office.com, logging in with your University credentials, and choosing the OneDrive app. Additionally, Office 365 apps such as Word and Excel can save directly to your University OneDrive. University managed devices also have the option to install the OneDrive sync app to allow OneDrive content to be available through File Explorer. Mobile devices can visit their associated app store to install the OneDrive app.

Files stored in your OneDrive are, by default, only accessible by you unless you have shared the file or the folder the file is contained in. To share a file:

- Right-click on the file and choose "Share". Optionally, click the  icon next to the file.
- Carefully choose how you wish to share the file and who you wish to share it with.

Files which need to be shared or collaborated on with a larger audience should be stored in Teams or SharePoint. Teams and SharePoint can be accessed through a web browser at https://office.com, logging in with your University credentials, and choosing their Teams or SharePoint app. Alternatively, Teams can be accessed through an app on your desktop or mobile devices. Office 365 apps such as Word and Excel can save directly to your University Teams or SharePoint sites. Other file types can easily be uploaded to these sites through the web or app interface.

Files stored within a Teams or SharePoint site will, by default, be accessible to all those who are members or have access to the site. Take special care to fully understand who these people are and if they should have access to the content of the file you are sharing through these sites. When in doubt, leave the file in your OneDrive and share from there.

Appendix C: Encrypting a file

When a file containing Sensitive PII is being stored or shared outside of the options found in Appendix A and Appendix B, it is important that the file is encrypted by other means. Encryption is the process of changing plain text into cipher text for the purpose of security or privacy. Many software applications exist that have the capability of encrypting files. It is the University's policy to use 256-bit AES encryption as the standard. When encrypting a file to secure Sensitive PII, ensure the application used to encrypt meets this as the minimum standard. Below are instructions for encrypting with WinZip, 7-Zip File Manager, and Adobe Acrobat Pro.

<u>To encrypt a file using WinZip:</u>

1. Save the file that needs to be encrypted.
2. Open up Windows Explorer and locate the file.
3. Right click on the file.
4. Select "WinZip, Add to Zip file…"
5. The "Add" dialog box will open.
6. The "Add to archive" box should be automatically populated with your file path. If not, select "New" and pick the path where the zipped file will reside. Insert the name of the "File name" box and click "OK".
7. In the "Action" box, select "Add (and replace) files".
8. In the "Compression" box, select ".Zip: Legacy compression (maximum compatibility)".
9. In "Split Zip file" box, select "Don't split".
10. In the "Options" area, click the "Encrypt added files" check box and uncheck the "Include system and hidden files" box.
11. In the "Archive Attributes" area, do not select either option.
12. Click the "Add" button.
13. Click the "OK" button on the "WinZip Caution" dialog box.
14. On the "Encrypt" dialog box, enter a string of characters as a password composed of letters, numbers, and special characters (a minimum 8 characters, a maximum of 64) in the "Enter password" box.
15. Retype the password in the "Re-enter password (for confirmation)" box.
16. Check the "Hide the password" checkbox if it has not already been checked.
17. Select the "256-Bit AES encryption" radio button.

18. Click “OK”.
19. You have successfully created the new Zip file which has the file encrypted and password protected in it. The new Zip file can now be attached to an email.

NOTE: In a **SEPARATE** medium (i.e. by phone or in person), send the password to the recipients of the email. As a last resort, the password can either be sent out by email prior to sending the file, or afterwards, but NEVER in the same email to which the file is attached.

To encrypt using 7-Zip File Manager:

1. Save the file that needs to be encrypted.
2. Open up Windows Explorer and locate the file.
3. Right click on the file.
4. Select “7-Zip, Add to archive…”
5. The “Add to Archive” dialog box will open.
6. The “Archive:” box should be automatically populated with the location and file name of the archive to be created. Adjust as needed.
7. The “Archive format” should be set to “zip”.
8. In the “Encryption” section under “Enter password”, enter a string of characters composed of letters, numbers, and special characters (a minimum 8 characters, a maximum of 64).
9. Retype the password in the “Reenter password” box.
10. In the “Encryption method” dropdown box, choose “AES-256”.
11. Click “OK”.
12. You have successfully created the new Zip file which has the file encrypted and password protected in it. The new Zip file can now be attached to an email.

NOTE: In a **SEPARATE** medium (i.e. by phone or in person), send the password to the recipients of the email. As a last resort, the password can either be sent out by email prior to sending the file, or afterwards, but NEVER in the same email to which the file is attached.

To encrypt a PDF file using Adobe Acrobat Pro:

NOTE: Adobe Acrobat Professional is licensed software that must be purchased. The recipient of the encrypted file will need Adobe Acrobat Reader the same version or higher than your version of Adobe Acrobat Pro.

1. Open up Windows Explorer and locate the file.
2. Make sure the file is in PDF format. If not, right click on the file and click “Convert to Adobe PDF” to save the file with a PDF extension.
3. With the PDF file open in Adobe Acrobat Pro, click “Advanced, Security, Encrypt with Password”.
4. Click “Yes” when prompted to change the security on the document.
5. Set “Compatibility” to “Acrobat 9.0 or later” so that the encryption level is 256-bit AES. Ensure that “Encrypt all document contents” is selected.
6. Check the box labeled “Require a password to open the document”.
7. Enter a password in the “Document Open Password” field. Please make sure the password is at least 8 characters long and is a combination of letters, numbers, and special characters. Click “OK”.

8. In the “Adobe Acrobat – Confirm Document Open Password” box, retype the password in the “Document Open Password” field.
9. Click “OK” if you see a message that the settings do not take effect until the document is saved.
10. Close the PDF document or close Adobe Acrobat Pro.
11. You have successfully created the new encrypted and password protected PDF file which. The new PDF file can now be attached to an email.

NOTE: In a **SEPARATE** medium (i.e. by phone or in person), send the password to the recipients of the email. As a last resort, the password can either be sent out by email prior to sending the file, or afterwards, but NEVER in the same email to which the file is attached.

Appendix D: Securely sending emails and attachments

When sending an email, whenever possible avoid including Sensitive PII in the body of the message. It is much more secure sharing Sensitive PII within a protected file following the instructions found in Appendix B. When this is not possible, apply a Sensitivity Label to the email following the instructions found in Appendix A. When this is not possible, encrypt the data in a file following the instructions found in Appendix C, attach the file to your email message, and then either:

- Add the keyword “(ocu only)” in the subject line (including the parenthesis) so that the email system provides an extra layer of security, preventing it from being accessed by anyone without a University email address, or
- Add the keyword “(encrypt)” in the subject line (including the parenthesis) so that the email system routes the outbound email to an encrypted web portal where the external recipient can access the content with a one-time code.

Appendix E: Encrypting a USB flash drive

While cloud storage is ideal when needing to store and access data wherever you may have Internet access, there are still situations where you might need to have data on a flash drive. When your data travels on a flash drive, it’s especially important to encrypt it if it contains Sensitive PII or really anything you wouldn’t allow a stranger to hold on to.

There are some other security risks that thumb drive owners should be aware of. If you plug your flash drive into an infected computer, your flash drive can also become infected by viruses or malware and infect other devices that you plug your flash drive into. Encrypting your flash drive will protect your data from cyber-attacks.

The steps one must take to encrypt a flash drive will vary depending on what operating system your computer uses. Here’s how to make it happen when you’re using Windows:

1. Plug your flash drive into a USB port of your Windows computer.
2. Click File Explorer. If you can’t find it, simply press the Windows logo key + E on your keyboard.
3. Right-click your flash drive and select BitLocker, then turn BitLocker on. BitLocker is available on supported devices running Windows 10, Windows 11 Pro, Enterprise, or Education. Next, wait for BitLocker to start.

4. Choose a password that you'll use to unlock your flash drive. It's important that you choose a strong password that others wouldn't be able to guess. Never reuse passwords across devices—your password for your flash drive should be completely new.
5. Choose how to save your recovery key. The recovery key will let you recover the information on your flash drive in case you forget the password for your flash drive.
6. Select what data you want to encrypt. You can select the entire drive or the used disk space only.
7. Click "Start Encrypting." Keep your flash drive plugged in for this entire process.
8. You'll receive a notification when the encryption process is complete. Once you receive this notification, it is safe to remove your flash drive from the computer.

Appendix F: Frequently Asked Questions

These FAQs provide guidelines on how to protect Sensitive PII.

1. How can I protect Sensitive PII…
    a. In the office?
        i. Physically secure Sensitive PII (e.g., in a locked drawer, cabinet, desk, or safe) when not in use or not otherwise under the control of a person with a need to know. Sensitive PII may be stored in a space where access control measures are employed to prevent unauthorized access by members of the public or other persons without a need to know (e.g., a locked room or floor, or other space where access is controlled by a guard, cipher lock, or card reader). But the use of such measures is not a substitute for physically securing Sensitive PII in a locked container when not in use.
        ii. Never leave Sensitive PII unattended on a desk, network printer, fax machine, or copier.
        iii. Use a privacy screen if you regularly access Sensitive PII in an unsecured area where those without a need to know or members of the public can see your screen, such as in a reception area.
        iv. Lock your computer when you leave your desk. Depending on your computer type, you may lock your computer by (1) holding down "⊞"+ "L", (2) holding down "Ctrl"+ "Alt" + "Delete" and then hitting "Enter".
        v. Avoid discussing Sensitive PII in person or over the telephone when you are within earshot of anyone who does not need to know the information.
            1. If you must discuss Sensitive PII using a speakerphone or video teleconference, do so only if you are in a location where those without a need to know cannot overhear.
            2. Keep in mind that phone conversations are easily overheard between cubicles, so Sensitive PII is most securely discussed in an office or conference room behind a closed door.
            3. Remember that some places that seem private still pose a risk for unauthorized disclosure, such as in a taxicab.
    b. While traveling?

i. Sensitive PII should only be accessed via University-approved PEDs such as laptops, tablets, USB flash drives, and external hard drives, all of which must be encrypted.
ii. Personally owned computers should not be used to save, store, or host Sensitive PII. Sensitive PII may be accessed from a personally owned computing device through a secured web interface, or through a VPN connection to a University computer or network share.
iii. When transporting your laptop or PED:
    1. If you must leave it in a car, lock it in the trunk so that it is out of sight. Do not leave your laptop or PED in a car overnight.
    2. Do not store a laptop or PED in an airport, a train or bus station, or any public locker.
    3. Avoid leaving a laptop or PED in a hotel room. If you must leave it in a hotel room, lock it inside an in-room safe or a piece of luggage.
    4. At airport security, place your laptop or PED on the conveyor belt only after the belongings of the person ahead of you have cleared the scanner. If you are delayed, keep your eye on it until you can pick it up. Never place a PED in checked luggage.
    5. If your PED is lost or stolen, report it as a lost asset to your supervisor and to CTS.

c. While teleworking?
    i. Sensitive PII should only be accessed via University-approved PEDs such as laptops, tablets, USB flash drives, and external hard drives, all of which must be encrypted.
    ii. Personally owned computers should not be used to save, store, or host Sensitive PII. Sensitive PII may be accessed from a personally owned computing device through a secured web interface, or through a VPN connection to a University computer or network share.
        1. Do not move or copy files with Sensitive PII to your personal computing device.
        2. Do not print Sensitive PII on your home printer.
        3. Do not forward emails containing Sensitive PII to your personal email account (e.g., your Yahoo, Gmail, or Cox e-mail account) so that you can work on it on your home computer.
        4. Only University-approved cloud storage locations (i.e. Microsoft 365) can be used to store and access Sensitive PII from the cloud.
    iii. Obtain authorization from your supervisor to remove documents containing Sensitive PII from the office.
    iv. Secure your PED and any hard copy Sensitive PII while teleworking, and ensure that other household members cannot access them.
d. In email or other electronic transfer?
    i. **Within OCU**: Avoid sending Sensitive PII in the body of your emails whenever possible. While email traffic between University email accounts is secure, maintaining control over where an email might be forwarded or otherwise

accessed is a risk. Ideally, store Sensitive PII in University approved cloud storage locations and provide access to these files to others as required (see Appendix B). When email is required for sharing Sensitive PII, ensure the file is properly encrypted and the email message itself it further secured to limit access (see Appendix D).

ii. **Outside of OCU**: Always attempt to share from a University approved cloud storage location whenever possible (see Appendix B). When that is not possible and you are authorized and it is required to email Sensitive PII to an external recipient: send the PII in an encrypted mail attachment (see Appendix D). Do not send Sensitive PII in the body of the email message with external recipients.

e. When sending via facsimile (fax)?
   i. Avoid faxing Sensitive PII if at all possible. If you must use a fax to transmit Sensitive PII, alert the recipient prior to faxing so they can retrieve it as it is received by the machine. After sending the fax, verify that the recipient received the fax.

f. In the interoffice mail?
   i. Avoid sending Sensitive PII through interoffice mail when possible to limit the number of individuals who may possess the Sensitive PII material in transit. When it is necessary to use interoffice email, seal Sensitive PII materials in an opaque envelope or container.

g. In the outgoing mail?
   i. For mailings containing a small amount of Sensitive PII materials:
      1. Seal Sensitive PII materials in an opaque envelope or container.
      2. Mail Sensitive PII materials using the U.S. Postal Service's First Class Mail, Priority Mail, or an accountable commercial delivery service (e.g. UPS).
   ii. For large data extracts, database transfers, backup tape transfers, or similar collections of Sensitive PII:
      1. Encrypt the data (if possible) and use a receipted delivery service (i.e. Return Receipt, Certified or Registered mail) or a tracking service (e.g. "Track & Return") to ensure secure delivery is made to the appropriate recipient.

h. On my departmental shared drive, cloud-based storage site (e.g. Teams or SharePoint), intranet, or public websites?
   i. Do not post Sensitive PII on the University collaboration sites, shared drives, multi-access calendars, other intranet sites, or on the Internet (including social networking sites) that can be accessed by individuals who do not have a "need to know".
   ii. Consult with CTS for assistance with the process to control access to a network shared drive.
   iii. Consult with CTS for assistance with the process to control access to a cloud-based collaboration site.

2. How can I minimize my use of Sensitive PII?

a. Whenever possible, minimize the duplication and dissemination of electronic files and papers containing Sensitive PII.
    i. If you need to use a unique number or data element to identify individuals, use email addresses or Banner IDs instead of Social Security numbers.
    ii. Only print, extract, or copy Sensitive PII when the risk is justified by an official need that is not easily met using other means.
        1. For example, if you need to generate a list of employees and their salaries for a project, query the payroll database to return only those employees' names and salaries (and not, for example, other sensitive data such as SSNs). If you cannot customize the reports generated by a database, consider loading the results into an Excel spreadsheet and deleting the data you do not need before saving the file and distributing it to others.
        2. Before emailing, printing or making paper copies, redact Sensitive PII that is not necessary for your immediate use or for a recipient to see.

3. Why shouldn't I store sensitive PII on unauthorized equipment?
    a. University approved PEDs such as laptops, tablets, USB flash drives, and external hard drives, are encrypted. Encryption protects the data on the device from being accessed by an unauthorized user if the device is lost or stolen.
    b. Non-university issued equipment, even if encrypted, may have unauthorized software or allow an unauthorized person to access the data. This equipment may also have viruses, spyware, or other technology that may cause harm to the University network, and could allow unauthorized access to University information, including Sensitive PII.
4. How do I secure Sensitive PII that cannot be encrypted, such as paper copies or some external media?
    a. Sensitive PII in hard copy or stored on external media must be kept in a locked compartment, such as filing cabinet or desk drawer. Alternatively, hard copies can be scanned and password protected or encrypted. External media can be mailed using the instructions outlined in this document.
5. What are my responsibilities when requesting or receiving Sensitive PII?
    a. When collecting Sensitive PII from members of the public, use only a University-approved paper or electronic form, and collect Sensitive PII directly from the individual to the extent possible.
        i. For example, if a University employee is helping a student fill out financial aid information, the student should fill out his or her information whenever possible. This will limit unnecessary dissemination of that individual's personal data, and will also allow him or her to be aware of what information is being collected and to consent to releasing that information.
        ii. As a best practice, every request you make for Sensitive PII should be accompanied by a reminder of how to properly secure the information. The University suggests the following reminder when requesting information from someone outside of the University: "The information I have requested is Sensitive Personally Identifiable Information. To properly secure this information, please send it within an encrypted and password-protected

attachment with the password provided under a separate cover, such as in person, by phone, or in a separate email."

iii. If someone sends you Sensitive PII in an unprotected manner, you must protect that data in the same manner as all Sensitive PII you handle once you receive it.
    1. For example, if someone outside of the University sends unsecured Sensitive PII in the body of an email to you, you must encrypt that data if you wish to email it to another non-University recipient.
    2. The University strongly recommends that you encrypt, restrict access, or password-protect Sensitive PII you share within the University, or redact the Sensitive PII before you share or print it.

6. When and how should I destroy materials containing Sensitive PII?
    a. Follow any and all retention and disposal policies required by your department. Sensitive PII, including archived emails containing Sensitive PII, shall be destroyed when retention of the data is no longer required, consistent with applicable record retention schedules.
        i. Printed material must be destroyed using an approved shredder or shredding service.
        ii. All Sensitive PII on storage devices must be permanently erased or destroyed.
        iii. PEDs containing Sensitive PII must be sanitized by CTS or an authorized service when no longer needed by an employee or contractor.