



9

Essential Elements of a Privacy Program



Inventory

Know your personal data—what you have, where it is, and who has access.



Security

Protect personal data from unauthorized access with restricted access, encryption, multifactor authentication, and/or multiple monitoring systems.



Transparency

Communicate about the processing of personal data in a way that is easily accessible and easy to understand.



Accountability

Your institution is accountable for what happens to personal data, even when it's processed by a third party, so conduct due diligence on vendors that will have access.



Usage

Use the personal data your institution collects only for its intended, stated, and/or expected purpose.



Data minimization

Reduce risk, save time, and maintain user trust by collecting and keeping the minimum amount of personal data necessary.



Legal basis

Determine the legal basis for processing personal data, such as consent, contract performance, legal requirement(s), or legitimate, vital, and/or public interest.



Access

Establish and maintain a process that grants individuals the right to see and/or obtain a copy of their personal data on file.



Integrity

Protect the accuracy, validity, traceability, and recoverability of your data by preventing unintended alterations during capture, storage, retrieval, update, and transfer.



www.ellucian.com

