

# If you're handling personal information

Personal Information is, *NOT de-identified aggregate data*, it is:



## Names, addresses, phone numbers

- First and last name
- Maiden name
- Mother's maiden name
- Home address
- Work or personal email address
- Work, cell, or home phone number



## Financial information

- Credit card number
- Bank account number



## Government ID information

- Social security number
- Passport number
- Driver's license number
- V Number



## Biometric identifiers

- Retinal scan
- Fingerprints
- Voice signatures
- Facial geometry



## Other personal identifiers

- Photographs, especially of face or unique scars or tattoos
- Handwriting
- Date of birth



## Authentication information

- Unencrypted passwords
- Information to re-enable passwords
- Two factor with Duo-Mobile

# You'll need know and ensure compliance

Be prepared to discuss when:



## Collecting or Processing

- What is the business purpose of collecting or processing the data
- How you plan to minimize the data collected or processed
- How you plan to communicate the purpose of collecting or processing to the individuals whose data we are using
- How individuals will be able to view and amend the information we've collected



## Storing by VCU? 3rd Party Hosting?

- If 3rd P - has IT Governance Committee Performed Risk Assessment
- What is the business purpose of storing the data
- How long the data will be stored
- What internal and external security needs to be in place
- Who (internally) needs access to the data
- How a system breach or compromised data will be reported



## Deleting/destroying - Is this a copy or an original?

- What is the business purpose of deleting or destroying the data
- What is the most secure way to delete or destroy the data
- When deletion or destruction will be scheduled or is permitted to be destroyed per law, regulation or contracted agreement (research specific)

Need more help?



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