

# Information Security Program

Revised 10/2018

Personally Identifying Information, or PII security should be the utmost concern for any person who handles the student files at Continental Academie. By assessing risks and following protocol, we can avoid exposing identifiable information to people and companies who have no rights to view student information.

At the Academie, a student's information is viewed and reviewed multiple times throughout their program from multiple departments. The Admissions, Finance, and Financial Aid Departments will all have access to a student's PII. As a school, we must protect student's information by adhering to the following safeguards:

## **HARD COPY FILES**

Student Files are to be kept in select designated areas. Student files with PII will be kept on the 3<sup>rd</sup> floor behind a locked door when not being occupied. Only Authorized personnel are allowed to handle students' files. These personnel include:

Current President of the Academie

Current Vice President of the Academie

Financial Aid Director

Bursar

Other people may have permission to view and handle files but must get authorization from one of the people mentioned above. Files must be returned to the same person they originally got authorization from.

*Students at the Academie have a secondary file located downstairs on the first level in the Instructor's room. These files only house grades and progress reports with redacted PII. These files, however are still kept in a locked room when not being occupied for security purposes.*

## **EMAIL / SENDING STUDENT PII VIA THE WEB**

Any student PII that is sent via email or over a web-based application (that does not have its own firewalls/ protections) MUST adhere to the following:

- If able, redact a portion of the students PII- For example for a social Security number, used (xxx-xx-5555)
- Encrypt the documents with password protection. The email containing the password should be sent SEPERATELY than the sensitive documents.

## **DIGITAL Files**

As well as a hard copy students file, The Academie retains a digital version of the students file through the software Genesis, which is operated by Financial Aid Services, Inc. out of Salem, NH. The Academie's software for this system, as well as all documents and data is kept on a cloud based server which is housed by a third party IT provider, Kilpatrick IT Solutions, LLC.

At Kilpatrick, the Academie's data and applications are hosted on two separate geographically diverse datacenters. Data centers are HIPPA, compliant, PCI compliant, and SSAE 16 certified. All data and applications housed by Kilpatrick are housed on dedicated virtual servers and are not shared by another company.

With our contract, Kilpatrick IT offers 24/7 a network monitoring service that allows them to watch every aspect of our network and detect and report problems before they escalate.

## **EVALUATING POLICY**

The Academies' Information Security Program will be evaluated on a minimal bi-annual basis, but may be updated more frequently to adhere to state, federal, or NACCAS regulations.

## **DESINGATED EMPLOYEES**

Designated employees who will be responsible for implementing and coordinating the Academie's Information Security Program:

Ashley Coleman- Director of Financial Aid

Kristi McInnis- Bursar