Identity Theft Policy

Policy Statement

The purpose of this policy is to help protect Marywood University, its employees, and those they serve from damages related to the loss or misuse of sensitive information through identity theft and data loss.

Pursuant to the Red Flag Rules of the Federal Trade Commission, Marywood University has identified several types of covered accounts and has established an *Identity Theft Red Flag Program.*

The Vice President for Business Affairs is responsible for oversight of the Program by
- ensuring its development and updating;
- ensuring its implementation;
- reporting periodically to the President of the University on its status.

The Chief Information Officer, as Program Administrator, is responsible for
- developing procedures for preventing and mitigating risks of identity theft;
- ensuring appropriate training of staff;
- reviewing any reports regarding detection of red flags;
- determining which steps of prevention and mitigation should be taken in particular circumstances;
- recommending changes to the Program;
- publishing the Program on the Office of Information Technology (OIT) website;
- reporting periodically to the Vice President for Business Affairs on the status of the Program.

Every member of the Marywood University community is responsible for reducing risk of identity theft and fraudulent activity by
- being well informed about the University's *Identity Theft Red Flag Program;*
- taking appropriate steps to prevent and mitigate risks as described in the details of the Program.

Definitions

Identity Theft is using someone's personal identifying information without permission in order to commit fraud or other crimes.

Red Flag is a pattern, practice, or specific activity that indicates the possible existence of identity theft.

Covered Account is an account that a creditor offers or maintains, primarily for personal, family, or household purposes that involves or is designed to permit multiple payments or transactions.

Procedures

See the Marywood University *Identity Theft Red Flag Program* on the OIT website.

Related Policies and Committees

Civil Rights Policy
Civil Rights Complaint Procedures

History of the Policy

03/20/09 – Approved by the President of the University as recommended by the Policy Committee of the University

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POLICIES AND PROCEDURES MANUAL