Supplier Privacy Reviews
Learning Objectives

• What is privacy?

• When is a privacy review needed when procuring software?

• Questions to ask suppliers

• Privacy red flags

• Where to direct questions
Privacy Values

• UC respects the privacy of individuals.
• Privacy plays an important role in human dignity and is necessary for an ethical and respectful workplace.

Privacy Principles

• Autonomy Privacy – Individual
• Information Privacy and Security
When is a privacy review needed?

New Software

Examples:
- survey tools, apps, document management, cloud storage, cloud backup, eFax, productivity software, event management software, etc.

Renewal or New Uses

Updates to comply with IS-3, GDPR, FERPA, CA and UC Privacy Principles

New uses can require new protections
Software Procurement Questionnaire

Will this software be used to collect, store, access or transmit data related to any of the following?

- Sensitive identifiable human subject research
- Financial information (e.g., student loan/financial aid, accounting payroll)
- Human resource information (e.g., staff, faculty, student worker personnel)
- Personally identifiable information (PII) (e.g., full name, email address, date of birth, social security number, home address, telephone number)
- Protected health information (i.e., subject to HIPAA or Data Use Agreements)
- Other sensitive medical information (e.g., disability or genetic information)
- Student education records
- Data related to European residents (does not apply to British residents)
Privacy in Software Procurement

UCI

Obligations
- Protect privacy rights
- Comply with laws

• Data Classification
• Privacy by Design
• Data Minimization
• Risk Reduction

Questions to Ask Suppliers
- **Where** is UCI institutional information stored?
- **Who** has access?
- What **safeguards** do they use (show us)?
- Will they keep use, **sell or share** our information?
- How will they **notify** UCI if something goes wrong?
Privacy Red Flags

- Suppliers who want to sell our information to others.
- Resistance to breach notification requirements.
- Suppliers who don’t have a privacy statement or policy.
- Agreements that exempt suppliers from all liability.
Privacy Questions?

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