

# **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

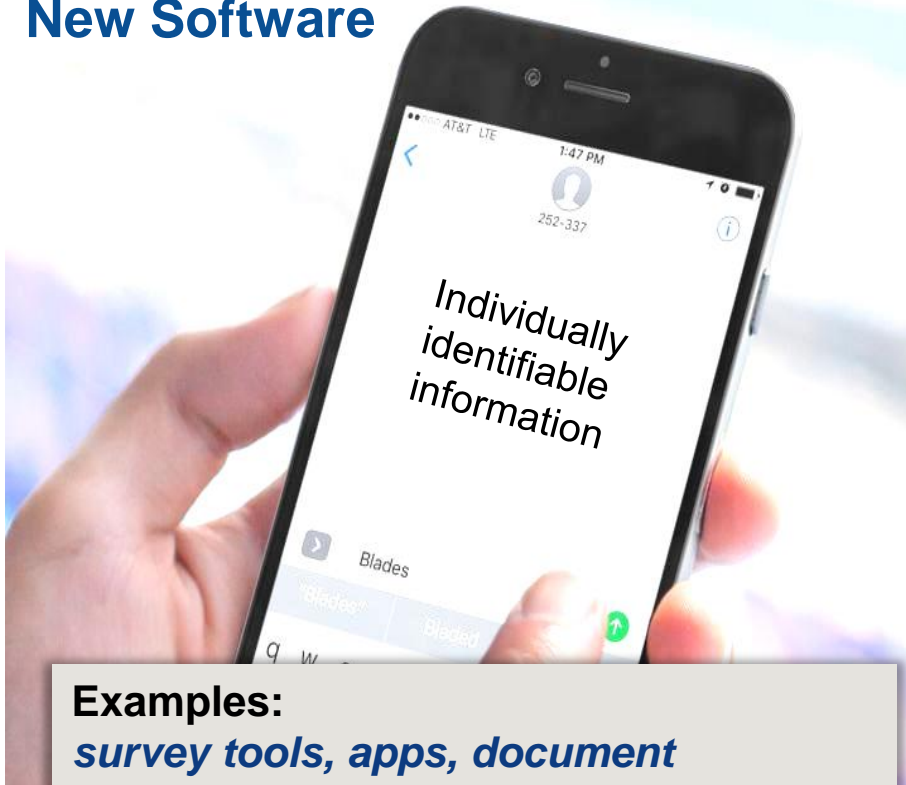
- UC respects the privacy of individuals.
- Privacy plays an important role in human dignity and is necessary for an ethical and respectful workplace.

## 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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