

9 CONFIDENTIAL INFORMATION PROTECTION

The protection of confidential information is critical to any business in defining and maintaining success. These information assets include:

- The features of unreleased product, schedules, and launch strategies
- Pre-released financial data, not yet available to the public
- Future business ideas and concepts
- Network and systems access passwords
- Information relating to pending acquisitions and joint ventures
- Operational strategies
- Production, marketing, and sales forecasts
- Student's names and their product needs
- Employee records
- Student records
- Security procedures
- Any other information that has value, provides competitive advantage, and is not generally public

Confidential information can be presented or stored in many forms, including but not limited to: paper documents, information on electronic storage media, information passed by voice, charts and graphic presentations, audio and video tapes, and email. In any form, it must be protected.

SCOPE

This policy applies to all employees, contractors, temporary workers, and business partners of Northern Oklahoma College and its subsidiaries, worldwide. It applies to proprietary and confidential information in all forms and expressions, developed, owned, and maintained by and for Northern Oklahoma College.

DEFINITION

Confidential information is defined as any data, whether it be technical, financial, operational, or strategic, that if improperly used or disclosed to unauthorized parties, could adversely affect Northern Oklahoma College competitive advantage, or be otherwise damaging to Northern Oklahoma College.

RESPONSIBILITIES

Management personnel are responsible for implementing information protection policy and procedures and monitoring compliance within their respective organizations.

The Director of Information Technology is responsible for establishing and implementing organization-wide information systems and network security policies, standards, and procedures.

Employees, contractors, temporary workers, and business partners are responsible for protecting Northern Oklahoma College confidential information by following this policy and the related protection procedures and for protecting the confidential information of others that has been entrusted to Northern Oklahoma College.

The Originator of a document or other expression containing confidential information is responsible for classifying the information as "confidential" and labeling it properly with handling instructions as appropriate.

CLASSIFYING AND LABELING CONFIDENTIAL INFORMATION

It is the responsibility of the *originator* of confidential information to identify it as *confidential* and label it properly. Information that needs safeguarding – including emails and presentations – should be visibly labeled “**Northern Oklahoma College Confidential**” at the top or the bottom of each page.

The originator of confidential information may specify distribution and handling instructions by including them in the label. Typical handling instructions include:

Internal Use Only, which specifies that the information is only for Northern Oklahoma College (who have signed confidentiality agreements).

Do Not Copy or Distribute, which stipulates that the receiver of this information may not distribute it further, forward it, or otherwise disclose it to others, without the agreement of the originator. The label should read, **Northern Oklahoma College: Do Not Copy or Distribute**.

In certain situations, documents will contain headings and labels established by the Legal Department to maintain attorney-client privilege or as “registered and restricted” as determined by the executive staff and Board of Regents. Once the college releases confidential information to the public, or other circumstances undo the need for confidentiality, we should discontinue using these labels.

INFORMATION PROTECTION PROCEDURES

- Employees must be careful when discussing confidential information so those without authorization and a need-to-know do not overhear these conversations. This is especially important in public places and while traveling. Do not expose confidential information, presentations, etc., to those seated around you when traveling on airplanes. Be careful using a computer in conditions where others can view the screen.
- When traveling, do not put confidential information in your checked baggage. Keep it with you and protect it at all times. Use the hotel room safe or safe deposit box to store it if you need to leave it at the hotel. Keep electronic versions of confidential information separate from your computer. Use password protection and, whenever possible, encryption.
- Third parties, including contractors, vendors, and business partners who are privy to Northern Oklahoma College confidential information should sign confidentiality or non-disclosure agreements. Consult the Legal web site for information.
- Employees must lock their workstations (using a password screen saver, lock workstation, or other security feature) to prevent access when away from their desks.
- Employees must protect their workstations and college networks from computer viruses by using Northern Oklahoma College resident virus scanning applications. Do not disable or modify this software.
- Northern Oklahoma College facilities must be secure and access must be restricted to areas where confidential information is processed, used and stored.
- While visitor procedures may vary among Northern Oklahoma College locations, all guests are to identify themselves and register with security, the receptionist, or their host before entering Northern Oklahoma College facilities. Visitors to non-public work areas within Northern Oklahoma College must be escorted.
- When handing out a confidential document, make sure it is delivered directly to the recipient. Do not leave it on their desk or chair. Use a Northern Oklahoma College confidential envelope if you must send it through internal mail.

- When using the post office or other carriers to send confidential information, put the document in a sealed Northern Oklahoma College confidential envelope, and then place that envelope inside the sealed mailing envelope. Do not label the outside envelope “Confidential” – it attracts attention.
- Documents and media containing confidential information must be stored out of view, inside the access controlled areas of our buildings, whenever possible. Confidential information should be stored in locked file cabinets or secure file rooms.
- Information stored on networks, hard drives, and other electronic storage media, must be protected by properly constructed passwords. Employees must not divulge, or let others use, their passwords. Passwords must be changed every 90 days.
- Employees, contractors and partners must not make unauthorized copies of Northern Oklahoma College or others licensed software or products.
- When no longer needed, documents and media containing confidential information should be shredded or otherwise destroyed, in accordance with the Northern Oklahoma College Records Management Policy.
- Faxing Confidential Information. If you must fax a confidential document, take these precautions:
 - Telephone the recipient and have them wait at their fax machine.
 - Carefully dial the number, double check it, send the fax, and wait for it to complete.
 - Telephone the recipient a few moments later and make certain they received all pages.
 - Confidential faxes should contain a paragraph instructing the recipient that the fax is confidential, and, if they receive it inadvertently, they are to notify Northern Oklahoma College and not divulge the information. Our standard heading for this purpose is:

This fax contains confidential information intended only for the addressee. Do not read, copy or disseminate it unless you are the addressee. If you have received this fax in error, please call us collect immediately at (insert phone number). Thank you.

- When photocopying confidential information, be careful to remove the original from the machine and take all the copies when you finish.

REPORTING

Immediately report unauthorized disclosures or uses of confidential information, as well as other potential information security issues, to your manager. The caller may report allegations without fear of retaliation and elect to remain anonymous.

PROTECTING LAPTOPS

When a laptop computer is stolen two kinds of loss is suffered: the computer, and, perhaps far more serious, information stored in the computer. Take these precautions:

- Do not leave your laptop unsecured in a Northern Oklahoma College office. Lock it in its docking station, secure it with a cable lock, or lock it up in a cabinet or your desk when it is not being used.
- Do not leave your laptop unattended in open view in your hotel room. Utilize the room safe if possible.
- Do not leave your laptop unattended and in open view in your automobile. If you must leave it in your car, lock it in the trunk.
- Never place your laptop in checked baggage and keep it securely with you in hotel lobbies, airports, restaurants, and other public places.
- Remember, the carrying case offers no protection from theft; what is inside is easily recognizable.

- Be careful using your laptop on airplanes and in public areas. Make certain those around you cannot read your screen if you are working with confidential presentations or other material.
- Use password protection and encryption, when possible.

DISCLOSING CONFIDENTIAL INFORMATION PROPERLY

Often Northern Oklahoma College business requires us to share confidential information with people outside our college. Northern Oklahoma College Legal Department has produced special nondisclosure and confidentiality agreements to use with vendors, customers, consultants, partners, and contractors. Employees are responsible for ensuring these agreements are signed and properly executed before divulging confidential information to these outside parties. Refer to the Legal Department web site for forms and instructions. Confidential information can only be disclosed to people outside Northern Oklahoma College when these agreements are in place.

REVIEWING YOUR RESPONSIBILITIES

Northern Oklahoma College's employees have signed employment agreements with Northern Oklahoma College specifying that they will protect college confidential information and the confidential information of others with whom we work. Following these policies and procedures is required by these agreements.