

Office of Financial Aid Information Security Policy

The Emory University Office of Financial Aid (“OFA”) is committed to meeting the requirements of the Gramm-Leach-Bliley Act (“GLBA”) by ensuring the protection of nonpublic financial information about a student or third party.

For the purposes of this policy, “nonpublic financial information” means any information:

- 1) A student or other third party provides in order to obtain a financial service from Emory;
- 2) About a student or other third party resulting from any transaction with Emory involving a financial service; or
- 3) Otherwise obtain about a student or other third party in connection with providing a financial service to that person.

OFA and Emory’s Enterprise Information Security office (“Information Security”) have established the Office of Financial Aid Information Security Program (“Information Security Program”) that outlines the methods by which OFA meets GLBA requirements. The Information Security Program describes the program scope; the designated Program Officer; the means by which risks are identified; required employee training and management; the oversight of service providers; adjustments to the information security program; and related policies.

Emory’s Chief Information Security Officer serves as the Program Officer and is responsible for overseeing and implementing the Information Security Program. The Program Officer delegates certain responsibilities related to the Information Security Program—such as employee training and the safeguarding of physical records—to OFA. The Information Security team will conduct reviews of the Information Security Program, at least annually, to ensure the University meets the requirements of GLBA and emerging requirements regarding the protection of nonpublic financial information about a student or third party.