

# 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. OFA and Emory's Library and Information Technology Services Enterprise Security department (LITS) have adopted an Information Security Program that addresses the methods by which OFA meets the requirements. The Information Security Program description describes the program scope; the responsible program officers; 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.

The Information Security Program is maintained by OFA. The Director of the Office of Financial Aid and Emory's Chief Information Security Officer serve as the Program Officers and ensure the Office of Financial Aid remains compliant with GLBA. OFA and LITS will conduct reviews of the Information Security Program, at least annually, to ensure that OFA meets the requirements of GLBA and emerging requirements regarding the protection of nonpublic financial information about a student or third party.

### Definitions

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.