Minnesota State University, Mankato University Policy	
Policy Name: Information, Privacy, and Security	**Effective Date of Policy** August 2023
Custodian of Policy: Vice President for IT Solutions and Chief Information Officer	**Date of Last Review** September 2022
Date of Adoption January 1, 2009	**Date of Next Review** September 2029

POLICY

All University Divisions and Colleges are responsible for adopting the minimum-security standards as established by this policy and all supporting IT Solutions Standards and Procedures. IT Solutions Standards and Procedures establish the minimum level of security required by the University. Divisions and Colleges are encouraged to work with Information Security Staff on how they can exceed these minimums for the protection of the University's information resources. In cases where University data or systems are actively or imminently under threat of compromise, the Vice President for IT Solutions (ITS) and Chief Information Officer (CIO) or designee will act in the best interests of the University.

Nothing in this policy shall be interpreted to expand, diminish, or alter academic freedom, articulated under Minnesota State Board Policy, Minnesota State University, Mankato Policy, collective bargaining agreements, or the terms of any charter establishing a system library as a community or public library.

Divisions, colleges, faculty, staff, students, emeriti, and/or affiliates who are subject to, but do not comply, with Minnesota State Board Policy, this policy, supporting standards or procedures may be subject to remedial action in accordance with applicable Federal and State Statutes, Minnesota State Board Policy, Minnesota State University Policies and Procedures, and/or collective bargaining agreements. Violations of this policy may result in loss of privileged access, administrative sanctions, and/or personal civil or criminal liability.

State Asset Technology Devices

All devices purchased with University funds and/or for official University programs with the ability to permanently store data must have a State of Minnesota Asset Tag affixed to it. Minnesota State Board Policy Procedure 7.3.6 Capital Assets requires all assets to be accounted for every 3 years. Due to the portability of technology assets, Minnesota State University, Mankato will account for and inventory all technology assets annually.

All technology assets will be the accountability of the Vice President or Dean of the respective Division or College. Each device will be assigned to a current employee of the University. The individual will be responsible for the proper inventory and security of the device as outlined in Minnesota State Board Policy Procedure 5.22.1 Acceptable Use of Computers and Information Technology Resources. Each College and Division will assign an inventory coordinator responsible for ensuring adherence to the requirements outlined in this policy. Individuals will also be responsible for the proper inventory tracking of the device(s) assigned to them.

Any transfer of state asset computing devices must be reported to the IT Solutions Center (itsolutionscenter@mnsu.edu). When a transfer of responsibility occurs, the device must be submitted to IT Solutions for erasure and re-installation in order to ensure the privacy and security of any remaining data on the device. All state asset computing devices no longer needed by a division or department must be disposed of through ITS by contacting the IT Solutions Center.

All state asset computing devices must be approved by IT Solutions, meet IT Solutions technology device standards, and have an operating system image approved by IT Solutions that meets Minnesota State University, Mankato Information Security Standards. Devices that do not meet IT Solutions computing device standards are subject to review and remedial action by the CIO and/or designee.

All technology devices paid for with University funds remain the property of the University. Division Vice Presidents and College Deans are accountable for ensuring the collection of technology devices upon the separation of an employee within their division or college. Any individual in possession of University devices after separation of employment from the University may result in loss of privileged access, administrative sanctions, and/or personal civil or criminal liability.

Multi-Factor Authentication

All University faculty, staff, students, emeriti, and/or affiliates technology accounts used to access University data must be enrolled in Multi-Factor Authentication where technologically available.

Software Purchasing

Software purchasing and usage creates a contract between the University and software vendor. Minnesota State Office of General Counsel requires that all software be reviewed for legal compliance and data security Risk. All software, regardless of cost, purchased or used by University faculty and staff must be reviewed by IT Solutions for data security risk prior to purchase or usage of the software. Software includes the use of cloud services.

Data Classification

According to Minnesota State Statutes Chapter 13 Section 13.03 Minnesota Government Data Practices Act, all University Data is considered public data and may be inspected or copied by everyone, unless otherwise classified by Federal Statute, State Statute, MnSCU Board Policy, System Procedure, System Guideline, University Policy, Standard or Procedure. Student Data is considered private unless otherwise classified by Minnesota State University, Mankato Student Education Records Policy. While data contained within University information technology resources may be public, ITS takes every reasonable effort to protect the security and privacy of the University's information technology resources and data. The IT Solutions staff of Minnesota State Mankato will not monitor or inspect data contained within University information technology systems except in limited circumstances detailed in supporting IT Solutions Standards and Procedures.

Exceptions

Exceptions with a documented business need may be requested by contacting the IT Solutions Center (itsolutionscenter@mnsu.edu). Upon review of the risk to the University, the CIO may grant exceptions to this policy and/or supporting standards and procedures. All approved exceptions are subject to periodic review and re-certification. Approved exceptions may be revoked at any time as circumstances change.

Support

Any actual or suspected compromise must immediately be reported to IT Solutions. The CIO or designee will consult with necessary stakeholders to determine an appropriate course of action based on the risk to the University.

Responsibilities

The CIO will be accountable for ensuring the responsibilities of this policy and supporting standards and procedures are carried out in the spirit of protecting the security and privacy of the University's data, systems, faculty, staff, students, emeriti, and affiliates. In cases where the privacy or security of the University are actively or imminently under threat of compromise, the CIO or designee will act in the best interests of the University. The CIO will have final decision-making authority over all matters related to information security policy, standards, and procedures. In case of un-documented or contradicting situations, the Information Security Staff will attempt to clarify and further document the situation with the CIO having final authority over decisions.

All Administrators, College Deans, and Division Vice Presidents will be responsible for ensuring their respective areas are following proper information security policy, standards, and procedures. All faculty, staff, students, emeriti, and affiliates are responsible for immediately reporting violations of information security policy, standards, and procedures to ITS.

Revisions to this policy will be subject to the Minnesota State Mankato University Policy Development policy. Revisions to supporting IT Solutions Standards and Procedures will be subject to review by the CIO and/or designee(s). University Shared Governance groups will be consulted as needed upon review by the CIO.

RATIONALE

Data and access to it is ubiquitous, and expectations and needs for access to data has become a critical aspect of our University's strategic health and viability. As we need to make access to data easy and usable to those at our institution who need it, it is equally critical that we protect our data from those who should not have access to it. Threats to and attacks on data in both professional and personal arenas are commonplace. Universities and higher education institutions are especially vulnerable to these threats and attacks because of our industry's inclination toward openness and collaboration. Data breaches from these threats and attacks are on the rise for higher education institutions. As a University, we have a duty to our students and ourselves to diligently protect the “confidentiality,” “integrity,” “availability,” and “accountability” of the University’s data. All faculty, staff, students, emeriti, and affiliates must make every reasonable effort to ensure the privacy and security of all data of the University.

The purpose of this policy and related standards and procedures is to ensure that all university faculty, staff, students, emeriti, and affiliates understand their duty and responsibility in reducing the risk of compromise through appropriate security measures. Access to University data is a privilege, not a right, and implies a duty and responsibility to adequately protect the University from compromise.

This policy is focused on the protection of the University’s information resources. Related Information Security Standards and Procedures establish the minimum-security standards in accordance with Minnesota State Board Policy 5.22 Acceptable Use of Computers and Information Technology Resources, MnSCU Board Policy 5.23 Security and Privacy of Information Resources, as well as related MnSCU Board Policy Procedures. Minnesota State Mankato Information Security Standards and Procedures are enforceable through this policy.

Definitions

Accountability – Accountability is the assurance that actions taken on University information systems are traceable to a source in the event of an Information Security Incident. It is also the assurance that the actions of an end-user are appropriately attributed to themselves without question for the protection of the end-user.

Affiliate – Affiliate is any individual or entity with an official relationship with the University whether paid or volunteer. Affiliates are subject to all Information Security Policy, Standards and Procedures.

Attack – Attack is any successful or unsuccessful unauthorized disclosure of University Data or unacceptable use or attempted use of University Information Systems.

Availability – Availability is the degree to which Data and/or Information Systems are accessible to University Faculty, Staff, Students, Emeriti, and/or Affiliates.

Breach – Breach is any unauthorized use or disclosure of University data or Information Systems

CIO – Vice President for Information and Technology Services and Chief Information Officer

Confidentiality – Confidentiality is the assurance that University data or Information Systems are available only to those who are authorized to access or use data or Information Systems.

Data – Data is any information accessed, stored, transmitted or overseen by the University.

Data Owner – The Data Owner is the person(s) that can authorize or deny access to certain data and is responsible for its accuracy, classification, integrity and timeliness. Information and Technology Services staff are typically not data owners.

Data Custodian – The Data Custodian is responsible for ensuring that data systems and controls conform to requirements as set forth by the Data Owner. Data Custodians can be a subordinate of the Data Owner and/or the IT Solutions Staff.

Incident – An incident is any attempted or successful unauthorized access, use, disclosure, modification, or destruction of information; interference with information technology operation; or violation of explicit or implied acceptable usage policy.

Information System – Information System is any device or software used to access, store, transmit or oversee University data.

Integrity – Integrity is the assurance that systems are adequately protected and free from tampering of any kind.

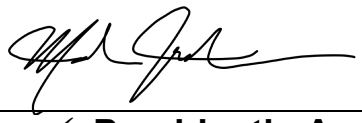
Risk – Risk is the possibility of suffering harm or loss or the potential for realizing unwanted negative consequences to University Data or Information Systems.

Risk Assessment – Risk Assessment is an evaluation of University Data or Information System to qualify and/or quantify identified risks, their potential severity and potential for compromise.

Software – Any program, web service, or other operating system used by faculty, staff, or students that may process, store, or transmit data related to the University or its students.

Related Information

University Information Security Standards and Procedures
Minnesota State Board Policy 5.22 Acceptable Use of Computers and Information Technology Resources
Minnesota State Board Policy 5.23 Security and Privacy of Information Resources
Minnesota Government Data Practices Act

Policy:		
Formal Review Process	**Date Submitted**	**Date Reviewed**
✓ **Vice President's Recommendation**		**Date**
		5-23-2023
✓ **President's Approval**		**Date**
Edward S. Inch / sls		05/26/23