Gramm-Leach-Bliley Safeguards Rule Decision Tree

Start

Are you significantly engaged in providing financial products or services?

yes

To customers who are Individuals (not businesses)?

yes

With whom you have an ongoing relationship (client vs. an isolated transaction)?

no

You are done.

no

no

no

no

yes

And for personal, family or household purposes?

yes

And does the customer data include non-public personally identifiable financial information in any form obtained in connection with a transaction with the University involving a financial product or service?

yes

You have data that requires compliance under the Safeguards Rule.

Review and comply with the University’s Information Security Program.

Examples in higher education include at a minimum student financial aid activities. An institution is not significantly engaged in financial activities where, for instance, it allows an individual to “run a tab” or if its only means of extending credit is lay-away, deferred payment plans or accepting payment by means of credit cards issues by others.

Examples include but are not limited to social security number, account numbers, income history, driver’s license, tax information, and name, address and phone number.

Reference materials and template are available on the Controller’s Office website.