- Q: Where can I find the requirements within the BPM?
- A: BPM Section 12.6 Data Privacy.
- Q: When did the BPM Section 12.6 go into effect?
- A: July 1, 2021.
- Q: Where can I find definitions to data privacy terms and acronyms?
- A: Data privacy definitions can be found within:

BPM Section 12.6 Data Privacy

DSR Process Guide

**RoPA Process Guide** 

IT Handbook Section 6

- Q: Who should I contact if I have questions about the BPM Section 12.6?
- A: USG Office of Ethics and Compliance.
- Q: Are their checklists for what institutions have to be compliant with in regards to BPM Section 12.6?
- A: Privacy Checklist

**GDPR Checklist** (if your institution is subject to GDPR; meaning, having a high volume of students, employees (faculty and staff), partners, etc. from or operating in the European Union).

Both checklists can be found on the USG Data Privacy webpage at: www.usg.edu/policies/dataprivacy.

- Q: Where can I find points of contact at each of the USG institutions?
- A: On the USG Data Privacy webpage at: www.usg.edu/policies/dataprivacy.
- Q: What is due from institutions in regards to Data Privacy requirements by December 31, 2021?
- A: 1. Institutional consent forms must require a human action.
  - 2. Website privacy disclaimers with a point of contact are present on the following institutional webpages: (1) home page; (2) human resources page; (3) admissions pages (undergraduate and graduate); and, (4) foundation home page (if any).
  - 3. Institution's privacy notice/policy is online with contact information.
- Q: What is due from institutions in regards to Data Privacy requirements by June 30, 2022?
- A: 1. Institution has supplier management processes in place to identify any data security requirements and embed, when appropriate, those data security requirements in any contracts/agreements.

- Q: What is due from institutions regarding Data Privacy requirements by December 31, 2022?
- A: Institution has implemented a formal process for data subjects to submit a request, which also tracks the processing of the data subject request (DSR) from open to close.
- Q: What is due from institutions regarding Data Privacy requirements by December 31, 2023?
- A: 1. Institution has:
  - a) identified and documented all instances of personal data within the scope of the institution's business activities, processes and supporting systems, developing an institutional record of processing activities (RoPA); and,
  - b) developed and implemented a plan to execute and maintain the RoPA.