



## **Ley Gramm-Leach-Bliley (Ley GLB)**

Política de Cumplimiento de la Ley Gramm-Leach-Bliley (GLBA)

**Título de la Política:** Cumplimiento de la Ley Gramm-Leach-Bliley (GLBA)

**Fecha de Adopción:** 01/07/2024

**Aprobada por:**

- Sr. José R. Rovira - Presidente

**Personal Responsable de la Implementación y Supervisión de la Política:**

- Sr. Rafael Jiménez – Vicepresidente Académico

**Fecha de Revisión:** 01/07/2024

---

### **1. Propósito**

El propósito de esta política es garantizar que *Mayaguez Institute of Technology* cumpla con los requisitos de la Ley Gramm-Leach-Bliley (GLBA), cuyo objetivo es proteger la privacidad y seguridad de la información personal no pública (NPI) de los estudiantes. La política describe los procedimientos para salvaguardar los datos de ayuda financiera de los estudiantes, prevenir el acceso no autorizado y garantizar el cumplimiento de las regulaciones de la GLBA.

### **2. Alcance**

Esta política aplica a todo el personal, facultad y administradores involucrados en la gestión, manejo o procesamiento de datos de ayuda financiera estudiantil en *Mayagüez Instituye of Technology*. Esto incluye, entre otros, a quienes participan en la administración de programas de ayuda financiera federales, estatales e institucionales.

### **3. Antecedentes**

La Ley Gramm-Leach-Bliley (GLBA), promulgada en 1999, incluye disposiciones destinadas a proteger la privacidad y seguridad de la información financiera personal de los consumidores en poder de las instituciones financieras, incluidas las instituciones educativas que participan en programas federales de ayuda financiera. Como parte del programa de Ayuda Federal para Estudiantes (FSA), *Mayaguez Institute of Technology* debe proteger la información personal no pública relacionada con la ayuda financiera de los estudiantes.

#### **4. Definición de Información Personal No Pública (IPN)**

Según la GLBA, la "información personal no pública" (IPN) se refiere a cualquier información de identificación personal que la Oficina de Ayuda Financiera recopila de los estudiantes o sus familias con el fin de determinar la elegibilidad para recibir ayuda financiera. Esto incluye:

- Información financiera (p. ej., ingresos, bienes, declaraciones de impuestos, etc.)
- Información personal (p. ej., número de Seguro Social, fecha de nacimiento, dirección, etc.)
- Información de la cuenta del estudiante (p. ej., ayuda financiera otorgada, detalles de desembolso, etc.)

#### **5. Responsabilidades de la Oficina de Ayuda Financiera**

La Oficina de Ayuda Financiera de *Mayaguez Institute of Technology* es responsable de las siguientes acciones para garantizar el cumplimiento de la GLBA:

##### **5.1 Política de Privacidad**

- La Oficina de Ayuda Financiera proporcionará avisos claros y transparentes a los estudiantes sobre sus prácticas para la recopilación, el uso y el intercambio de información personal no pública. Esto incluye un aviso de privacidad inicial y un aviso de privacidad anual para informar a los estudiantes sobre sus derechos bajo la GLBA.
- La oficina se asegurará de que los estudiantes tengan la opción de optar por no compartir información con terceros no afiliados, de conformidad con la GLBA.

##### **5.2 Protección de la Información Personal No Pública**

- Toda la información personal no pública (IPN) se almacenará y transmitirá de forma segura, de conformidad con las leyes federales de privacidad y los protocolos institucionales de seguridad de datos.
- Los registros impresos que contengan IPN se guardarán en lugares seguros y cerrados, y su acceso estará limitado únicamente al personal autorizado.
- Los registros electrónicos que contengan IPN se cifrarán tanto durante la transmisión como durante su almacenamiento en bases de datos, de conformidad con las normas de seguridad aplicables.
- El acceso a los sistemas de ayuda financiera y a los datos de los estudiantes se otorgará según sea necesario, con la autenticación de usuario y los controles de acceso adecuados.

### **5.3 Capacitación y Concientización**

- Todo el personal de la Oficina de Ayuda Financiera recibirá capacitación periódica sobre los requisitos de la GLBA, las leyes de privacidad, las mejores prácticas de seguridad de datos y las políticas institucionales para la protección de la información estudiantil.
- Se capacitará al personal para reconocer y reportar posibles violaciones de la privacidad o acceso no autorizado a la IPN.

### **5.4 Proveedores Externos**

- Cuando se utilicen proveedores o contratistas externos para procesar o gestionar la NPI en nombre de la Oficina de Ayuda Financiera, la institución se asegurará de que estos proveedores estén obligados contractualmente a cumplir con las normas GLBA sobre protección de datos.
- La institución actuará con la debida diligencia al seleccionar proveedores externos para garantizar que cuenten con las medidas de seguridad adecuadas para proteger la privacidad de los datos de los estudiantes.

## **6. Medidas de Seguridad de Datos**

La Oficina de Ayuda Financiera implementará y mantendrá sólidas medidas de seguridad de datos para garantizar que los datos de ayuda financiera de los estudiantes estén protegidos contra accesos, divulgaciones o pérdidas no autorizados. Esto incluye:

- Seguridad Física: Restringir el acceso a áreas donde se almacenan datos confidenciales de ayuda financiera (por ejemplo, archivos, servidores y estaciones de trabajo).
- Seguridad de la Red: Utilizar firewalls, sistemas de detección de intrusos y cifrado para proteger los datos confidenciales transmitidos a través de internet o redes internas.
- Eliminación de datos: eliminación adecuada de los registros en papel y electrónicos que contienen NPI cuando ya no son necesarios, mediante la destrucción de documentos y la limpieza segura del almacenamiento electrónico.

### **Anejo: Contrato de Seguridad de Datos Electrónicos**



(787) 335-0406   
www.rocketnetsolutions.com   
RocketNet Solutions  

Mayagüez Institute of Technology  
116 Calle Ramos Antonini  
Mayagüez PR, 00680


December 15, 2022

**PROGRAMMING CERTIFICATION EXCLUSIVELY FOR  
MAYAGÜEZ INSTITUTE OF TECHNOLOGY**

Our Emergency Cloud Backup & Critical Disaster Recover Solution, Includes creating backups (Continuously protect your most important data when and where it is being created without impacting your users' workflow. With customizable version retention settings and backups that run every day, ensures that you can meet your compliance and business continuity needs) . Recovery (can recover one or all files on a device in minutes in the event of file corruption, device failure, site disaster, or simple human error. Flexible restore options allow administrators to send download jobs to devices or allow users to initiate their own restores). Files are verified for accuracy to avoid corruption or loss. Handpick and prioritize what files go where, and how often.

Military Grade Compliance, With this Data Protecting Plan, your data is protected with industry best practices. Data is 256-bit AES encrypted by default before it is sent to your backup destinations. It will be kept safe when it leaves the computer and up in the cloud. And, our default encryption, combined with a Business Associate Agreement (BAA) allows customers the opportunity to maintain HIPAA compliance.

If you have any other questions or concerns about this, do not hesitate to contact us.  
We are always at your service.

 RocketNet Team Vigente al 12/15/2024. Renovable cada año.

## Gramm-Leach Bliley Act (GLB Act)

Policy on Compliance with the Gramm-Leach-Bliley Act (GLBA)

**Policy Title:** Compliance with the Gramm-Leach-Bliley Act (GLBA)

**Date of Adoption:** 07/01/2024

**Approved By:**

- Mr. José R. Rovira - President

**Staff Responsible for the Implementation and Supervision of the Policy:**

- Mr. Rafael Jiménez – VP for Academics

**Review Date:** 07/01/2024:

---

### 1. Purpose

The purpose of this policy is to ensure that Mayaguez Institute complies with the requirements of the Gramm-Leach-Bliley Act (GLBA), which aims to protect the privacy and security of students' nonpublic personal information (NPI). The policy outlines the procedures for safeguarding student financial aid data, preventing unauthorized access, and ensuring compliance with GLBA regulations.

### 2. Scope

This policy applies to all staff, faculty, and administrators involved in the management, handling, or processing of student financial aid data at Mayaguez Institute of Technology. This includes, but is not limited to, those involved in the administration of federal, state, and institutional financial aid programs.

### 3. Background

The Gramm-Leach-Bliley Act (GLBA), enacted in 1999, includes provisions aimed at protecting the privacy and security of consumers' personal financial information held by financial institutions, including educational institutions that participate in federal student aid programs. As part of the Federal Student Aid (FSA) program, Mayaguez Institute of Technology is required to safeguard nonpublic personal information related to students' financial aid.

### 4. Definition of Nonpublic Personal Information (NPI)

Under the GLBA, "nonpublic personal information" (NPI) refers to any personally identifiable information that is collected by the Financial Aid Office from students or their families for the purpose of determining eligibility for financial assistance. This includes:

- Financial information (e.g., income, assets, tax returns, etc.)
- Personal information (e.g., Social Security number, date of birth, address, etc.)
- Student account information (e.g., financial aid award, disbursement details, etc.)

## **5. Responsibilities of the Financial Aid Office**

The Financial Aid Office at Mayaguez Institute of Technology is responsible for the following actions to ensure compliance with GLBA:

### ***5.1 Privacy Policy***

- The Financial Aid Office will provide clear and transparent notices to students about its practices for collecting, using, and sharing nonpublic personal information. This includes both an initial privacy notice and an annual privacy notice to inform students of their rights under GLBA.
- The office will ensure that students are given the option to opt-out of information sharing with non-affiliated third parties, in compliance with GLBA.

### ***5.2 Safeguarding Nonpublic Personal Information***

- All nonpublic personal information (NPI) will be securely stored and transmitted in compliance with federal privacy laws and institutional data security protocols.
- Paper-based records containing NPI will be kept in locked, secure locations and access will be limited to authorized personnel only.
- Electronic records containing NPI will be encrypted both during transmission and while stored in databases, in accordance with applicable security standards.
- Access to financial aid systems and student data will be granted on a need-to-know basis, with appropriate user authentication and access controls in place.

### ***5.3 Training and Awareness***

- All Financial Aid Office personnel will receive regular training on GLBA requirements, privacy laws, data security best practices, and institutional policies on safeguarding student information.
- Staff will be instructed on recognizing and reporting potential breaches of privacy or unauthorized access to NPI.

### ***5.4 Third-Party Vendors***

- When third-party vendors or contractors are used to process or handle NPI on behalf of the Financial Aid Office, the college will ensure that these vendors are contractually obligated to comply with GLBA standards for data protection.

- The school will perform due diligence when selecting third-party vendors to ensure they have appropriate safeguards in place to protect the privacy of student data.

## **6. Data Security Measures**

The Financial Aid Office will implement and maintain robust data security measures to ensure that student financial aid data is protected against unauthorized access, disclosure, or loss. This includes:

- **Physical Security:** Restricting access to areas where sensitive financial aid data is stored (e.g., file rooms, servers, and workstations).
- **Network Security:** Employing firewalls, intrusion detection systems, and encryption to protect sensitive data transmitted over the internet or internal networks.
- **Data Disposal:** Properly disposing of paper and electronic records containing NPI when they are no longer needed, through shredding of documents and secure wiping of electronic storage devices.

## **7. Incident Response and Breach Notification**

In the event of a data breach involving nonpublic personal information, the Financial Aid Office will follow the school's established incident response and breach notification procedures. This includes:

- Notifying affected students as soon as possible, in accordance with GLBA breach notification requirements.
- Cooperating with school administration, IT, and legal counsel to investigate and mitigate the breach.
- Reporting the breach to appropriate regulatory authorities, as required by law.

## **8. Compliance Monitoring and Auditing**

The Financial Aid Office will regularly monitor and audit its processes to ensure compliance with the Gramm-Leach-Bliley Act. This includes:

- Conducting periodic reviews of data security and privacy practices.
- Evaluating the effectiveness of employee training programs.
- Performing risk assessments to identify and address any vulnerabilities in the handling of student financial aid data.

## **9. Policy Review**

This policy will be reviewed and updated annually to ensure that it remains in compliance with the Gramm-Leach-Bliley Act and other applicable privacy and security laws. Any updates or changes to the policy will be communicated to all relevant personnel.

## **10. References**

- Gramm-Leach-Bliley Act of 1999 (Pub. L. 106-102)
- U.S. Department of Education, Family Educational Rights and Privacy Act (FERPA)
- Mayaguez Institute of Technology Data Security Policy
- Mayaguez Institute of Technology Privacy Policy

## **Appendix**

- Mayaguez Institute of Technology Data Security Policy (Below)





(787) 335-0406   
www.rocketnetsolutions.com   
RocketNet Solutions  

Mayagüez Institute of Technology  
116 Calle Ramos Antonini  
Mayagüez PR, 00680


December 15, 2022

**PROGRAMMING CERTIFICATION EXCLUSIVELY FOR  
MAYAGÜEZ INSTITUTE OF TECHNOLOGY**

Our Emergency Cloud Backup & Critical Disaster Recover Solution, Includes creating backups (Continuously protect your most important data when and where it is being created without impacting your users' workflow. With customizable version retention settings and backups that run every day, ensures that you can meet your compliance and business continuity needs) . Recovery (can recover one or all files on a device in minutes in the event of file corruption, device failure, site disaster, or simple human error. Flexible restore options allow administrators to send download jobs to devices or allow users to initiate their own restores). Files are verified for accuracy to avoid corruption or loss. Handpick and prioritize what files go where, and how often.

Military Grade Compliance, With this Data Protecting Plan, your data is protected with industry best practices. Data is 256-bit AES encrypted by default before it is sent to your backup destinations. It will be kept safe when it leaves the computer and up in the cloud. And, our default encryption, combined with a Business Associate Agreement (BAA) allows customers the opportunity to maintain HIPAA compliance.

If you have any other questions or concerns about this, do not hesitate to contact us.  
We are always at your service.

 **RocketNet Team** Vigente al 12/15/2024. Renovable cada año.