



Avicenna International College

AIC Rules and Protocols

R-108

“AIC Confidentiality Policy Agreement”

Employees, faculty, and partners of Avicenna International College may be entrusted through the course of their work with Confidential Data including protected, sensitive, or “Personally Identifiable Information” regarding students, parents, staff, faculty, alumnae, donors, and volunteers. This type of information is protected by AIC policy and by law.

“Personally Identifiable Information” includes any information that identifies or describes the individual or data. Examples include but are not limited to social security numbers, credit card, and debit card numbers, financial or bank account numbers and routing information, driver’s license numbers, identification card numbers, and medical records (including pharmaceutical records). Such data combined with an individual’s first and last name (or first initial and last name) qualifies as “Personally Identifiable Information”.

“Confidential Data” may refer to all business, educational, financial, legal information about the activities of Avicenna International College. Such Confidential Data are handled with great care and any employee, teacher or contracted partner of AIC who may have access to such data will consider the data confidential and will not share them with anyone else from within AIC or outside AIC. If an employee, teacher or contracted partner of AIC gets access to such data but he/she is not designated person to have knowledge of such data, he/she should immediately inform the President or Principal of AIC.

Accessing, using and/or disclosing “Confidential Data” or “Personally Identifiable Information” for any reason other than the legitimate pursuit of the individual’s employment duties or in ways that jeopardize the security of such information constitutes misuse and can be legally prosecuted.

All employees and contracted partners are charged with safeguarding the AIC network and may not disclose their login credentials to others. Access to any AIC system with an employee’s login (username and password) is the responsibility of the employee. Employees are also responsible for immediately reporting to the

Principal and President, the suspected or actual use of their login by someone other than themselves.

An employee's access to "Confidential Data" or "Personally Identifiable Information" of AIC is conditioned upon the employee's acceptance of the obligations described in this "AIC Confidentiality Policy Agreement". The employee's obligation to protect such confidential or sensitive information continues after termination of employment. Any misuse or unauthorized release of such information, either during or subsequent to the conclusion of employment with Avicenna International College, may be grounds for legal action and/or disciplinary action up to and including termination from employment.

All employees of AIC (full time, part-time, contracted, invited teachers, and other types of agreement employments) have read this Policy, understand and agree with its content and undertake full responsibility for their actions. All employees understand and agree that having access to "Confidential Data" or "Personally Identifiable Information" does not grant them permission to actively seek, examine, use, transmit, share, copy or change such information with others and they understand and agree that they will only actively seek, examine, use, transmit, share, copy or change such information if (i) such permission has been granted to them by the President, Director or Principal of AIC; and (ii) such examination, review, or use is necessary for the performance of their duties and responsibilities as an employee of AIC.

It is understood by all employees that unauthorized use or disclosure of "Confidential Data" or "Personally Identifiable Information" will result in disciplinary action up to and including termination of employment or association, and the possible imposition of legal liability and/or fines pursuant to applicable laws. The obligation to protect AIC-related data continues after separation from AIC for all employees.