

## **Establishing and Maintaining an Information Security Program**

All customer information is safeguarded. This requirement applies to all nonpublic personal information in the school's possession (from students, parents, or other individuals with whom the school has a customer relationship). It also pertains to the customers of other financial institutions that have provided such information to the school.

The school establishes and maintains an information security program. This program must include the administrative, technical, or physical safeguards the school uses to access, collect, distribute, process, protect, store, use, transmit, dispose of, or otherwise handle customer information. The safeguards achieve the following objectives:

- Insures the security and confidentiality of customer information
- Protects against any anticipated threats or hazards to the security or integrity of such information, and
- Protects against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any customer
- Overseeing service providers. The school takes reasonable steps to select and retain service providers that are capable of maintaining appropriate safeguards for the customer information at issue and requires the service providers by contract to implement and maintain such safeguards.