

# PROCEDURE MANUAL

	<b>PROCEDURE 223.009</b>		
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	Last Revision Date:	04/13/2026	
	Effective Date:	03/07/2022	
Last Review Date:		04/13/2026	
Section:	Technology	Subject:	Privacy Procedure

## PURPOSE

The purpose is to outline the procedure utilized by Arizona Western College’s (AWC) Information Technology Services & Support (ITSS) which relates to all college-affiliated events (in person and online), websites to include the primary webpage, athletics, innovation centers, intranet, social media, college catalog, and more. The procedure outlines how the College collects, uses, protects, and manages personal information in compliance with applicable privacy laws and regulations, including FERPA.

## SCOPE

This procedure applies to all users of AWC technology assets including employees, students, volunteers, and contractors.

## PROCEDURE

1. Personal Information Collected
  - 1.1. Personal information is defined as the information used to identify or contact an individual.
  - 1.2. This may include, but is not limited to, first and last name, physical address, email address, student identification number, employee identification number, Social Security Number or phone number. (Reference NIST 800-053 for best practice)
  - 1.3. This information is not collected while browsing college webpages, but may be collected when submitting applications for admissions, making purchases, utilizing financial aid, online registrations, etc.
  - 1.4. This information may be collected to provide the user with products or services requested by the user.
2. Automatic Information Collected
  - 2.1. The college websites make use of various technologies to collect information via various internet browsers used when accessing institutional websites.
  - 2.2. The IP address information, internet browser information, date, and time the web pages are accessed are stored in secure traffic logs.
  - 2.3. The service provider uses statistical analysis to track and predict patterns to estimate resource needs.

2.4. Specific user sessions are not tracked unless there are technical issues, or evidence of fraudulent behavior, or illegal conduct.

### 3. Personal Information Use

- 3.1. The institution uses personal information for servicing accounts, which may require the transfer of information to our agents, employees, or service providers.
- 3.2. The information will not be sold or traded to unrelated third parties.
- 3.3. The user may also receive email notifications regarding status or order updates of requested services or items.
- 3.4. These notifications are considered part of institutional service, and the user may opt-out of these notifications by following instructions provided on the notification.
- 3.5. The institution may collaborate with third parties to provide professional and quality services.
- 3.6. When registering for services or products, the institution will share required personal information with third parties that are necessary to provide a product or service to the consumer.
- 3.7. The institution will not sell, or trade information collected online without consumer consent unless legally required to do so.
- 3.8. The institution may use personal information to validate a person's identity.

### 4. Information Control

- 4.1. Customer, student, and employee profiles are accessible via certain college websites or applications, and the user may update the individual profile at any time.
- 4.2. This includes the phone numbers, physical addresses, mailing information, and other contact information stored in the user profile.

### 5. Confidentiality and Security

- 5.1. The institution implements administrative, technical, and physical safeguards to protect personal information from unauthorized access, disclosure, or misuse.
- 5.2. Internally, access to personal information is limited to only approved employees that require this information to provide a service or product to the user.

## **REFERENCES**

1. NIST Special Publication 800-53B Joint Task Force. (2020). Control Baselines for Information Systems and Organizations. October 2020.
2. NIST Special Publication 800-53B Joint Task Force. (2020). Control Baselines for Information Systems and Organizations. October 2020. Retrieved from <https://doi.org/10.6028/NIST.SP.800-53B>
3. NIST Special Publication 800-53B Joint Task Force. (2020). Control Baselines for Information Systems and Organizations. October 2020. Retrieved from <https://doi.org/10.6028/NIST.SP.800-53B>

## **HISTORY**

<b>IT Reviewer Name</b>	<b>Update Date</b>	<b>AWC Reviewer</b>	<b>Approval Date</b>
Tyler Vodehnal	1-24-2023	Ashley Herrington	5-22-2023
Scott Estes, Caleigh Flores, Tyler Vodehnal	11-20-2023		
Tyler Vodehnal	04-01-2024	Ashley Herrington	04-01-2024
Scott Estes, Tyler Vodehnal, Mercedes Soto	2/4/2025	Dr. Daniel Corr	05/06/2025
Scott Estes, Tyler Vodehnal	02/04/2026	Dr. Reetika Dhawan	4/13/2026