



Pharr Literacy Project, Inc.
Privacy and Protection of Personal Information

A. Purpose - The purpose of this policy is to clarify PLP's commitment to maintaining the privacy and security of personal information for both students and non-students by identifying the general personal information security programs in place at the PLP.

B. General Personal Information Security Program

1. Requirements – PLP safeguards against inappropriate disclosure and abuse of personal information that the PLP holds, as required by applicable laws and regulations which may include:
 - [The Privacy Act of 1974](#)
2. Basis - PLP's general personal information security program includes:
 - a. Identification and prioritization of personal information data elements subject to protection under state and federal law;
 - b. Highest Risk Personal Identifiers (HRPIS) - Identifiers through which the personal information can be accessed, and identity theft crime may occur includes:
 - Credit Card Numbers (CCNs)
 - Social Security Numbers (SSNs)
 - Drivers License Numbers (DLNs)
 - Automatic Clearing House information (such as bank account #s)
 - Certificate/License Number
 - Credit Reports/Histories
 - Electronic Signatures
 - Passwords
 - PIN Numbers

Measures to be taken with respect to HRPIS include:

- 1) To the extent appropriate, minimizing the number of offices, computers, and databases that collect and/or store HRPIS..
- 2) Requiring submission of SSNs and DLNs only where required or authorized by law.
- 3) Providing for the delivery of PLP services in ways that do not **require** submission of SSNs or DLNs except where authorized or required by law.
- 4) Providing all required notices to the individual of the purpose for collecting SSNs and DLNs when and where they are collected.
- 5) Controlling the use of SSNs and DLNs to be consistent with the use that has been disclosed to the individual or to other usage required by law or policy.
- 6) Avoiding disclosure of SSNs and DLNs except with written authorization of the individual involved or when required or permitted by law or policy.
- 7) Providing affected individuals with written notice upon discovery by PLP of theft, accidental disclosures, or breaches of security that



Pharr Literacy Project, Inc.
Privacy and Protection of Personal Information

create a high risk of disclosure or compromise of protected information.

- 8) Applying the safeguarding measures described below in Subsection B.4.
 - 9) Avoiding external disclosure except with written authorization of the individual involved or as may be required by law, policy, or legitimate PLP business.
- C. Review** - This policy shall be reviewed every three years or as laws and rules change by the board of directors.