

PRIVACY CONSIDERATIONS WHEN ENGAGING VENDORS FOR THIRD-PARTY ADMINISTERED SURVEYS

The Privacy Principles guide best practices in the protection of personal information and the identification of potential privacy concerns. Below are privacy considerations related to the use of third-party survey vendors.

- ❖ **Limitation Principle: Limit data collection to the minimum necessary to accomplish the specific purpose. Limit and retain data in accordance with University policies and standards.**
 - Have the purpose and scope of the survey been clearly defined? Does each data element collected align with the purpose of the survey?
 - Where possible, has data been deidentified at the point of collection, when stored and when reported?
 - Has access to identifiable data been restricted to personnel with a job related need to know?
 - Review vendor agreements in collaboration with procurement, security, data governance, and privacy.
 - Are data rights retained by the University?
 - Will the vendor store data? If so, where will the data be stored, for what purpose and for how long?
 - How and when will data be disposed?
 - Does the technology meet the appropriate security standards?

- ❖ **Accountability Principle: Hold personnel accountable for the protection of information.**
 - Have personnel accessing data been trained on the appropriate handling of the data?
 - Confirm the use of appropriate privacy and security protocols for the transmission of data from the vendor and storage of data upon receipt.
 - Review vendor agreements in collaboration with procurement, security, data governance, and privacy.
 - Is the vendor being held accountable for applicable legal compliance requirements, e.g., FPPA, HIPAA, FERPA, COPPA?
 - What are the vendor's reporting and mitigation responsibilities if it is suspected or confirmed that data was compromised?

- ❖ **Transparency Principle: Provide survey participants with reasonable advance notice of how their data will be collected, used, shared, and stored.**
 - What are the vendor's information practices as described in its Privacy Notices and Terms of Service?
 - Review vendor agreements in collaboration with procurement, security, data governance, and privacy.
 - How are survey participants informed about how their information will be collected, used, shared, and stored?
 - What data-related terms does the vendor require survey participants to agree to in order to access and use the survey tool?
 - Will the vendor share data with other parties? If so, what data, with whom, and for what purpose? What happens to the data at the end of the contract?

- ❖ **Proactive Due Diligence Principle: Periodically review compliance status with the vendor.**