

**Q: Where can I find the requirements within the BPM?**

A: [BPM Section 12.6 Data Privacy](#).

**Q: When did the BPM Section 12.6 go into effect?**

A: July 1, 2021.

**Q: Where can I find definitions to data privacy terms and acronyms?**

A: Data privacy definitions can be found within:

[BPM Section 12.6 Data Privacy](#)

DSR Process Guide

RoPA Process Guide

[IT Handbook Section 6](#)

**Q: Who should I contact if I have questions about the BPM Section 12.6?**

A: [USG Office of Ethics and Compliance](#).

**Q: Are their checklists for what institutions have to be compliant with in regards to BPM Section 12.6?**

A: **Privacy Checklist**

**GDPR Checklist** (if your institution is subject to GDPR; meaning, having a high volume of students, employees (faculty and staff), partners, etc. from or operating in the European Union).

Both checklists can be found on the USG Data Privacy webpage at:

[www.usg.edu/policies/dataprivacy](http://www.usg.edu/policies/dataprivacy).

**Q: Where can I find points of contact at each of the USG institutions?**

A: On the USG Data Privacy webpage at: [www.usg.edu/policies/dataprivacy](http://www.usg.edu/policies/dataprivacy).

**Q: What is due from institutions in regards to Data Privacy requirements by December 31, 2021?**

- A:
1. Institutional consent forms must require a human action.
  2. Website privacy disclaimers with a point of contact are present on the following institutional webpages: (1) home page; (2) human resources page; (3) admissions pages (undergraduate and graduate); and, (4) foundation home page (if any).
  3. Institution's privacy notice/policy is online with contact information.
  4. Institution is using USG purchasing agreements/contracts or has embedded privacy requirements in their own documents.

**Q: What is due from institutions regarding Data Privacy requirements by December 31, 2022?**

A: Institution has implemented a formal process for data subjects to submit a request, which also tracks the processing of the data subject request (DSR) from open to close.

**Q: What is due from institutions regarding Data Privacy requirements by December 31, 2023?**

**A: 1. Institution has:**

a) identified and documented all instances of personal data within the scope of the institution's business activities, processes and supporting systems, developing an institutional record of processing activities (RoPA); and,

b) developed and implemented a plan to execute and maintain the RoPA.