

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.

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.

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.

Q: What is due from institutions in regards to Data Privacy requirements by June 30, 2022?

- A:
1. Institution has supplier management processes in place to identify any data security requirements and embed, when appropriate, those data security requirements in any contracts/agreements.

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.