

University of Arizona Privacy Principles

The enactment of these Privacy Principles demonstrates privacy as an important value at the University of Arizona (“University”). The University recognizes that data use can be personally beneficial to students, employees, and the University community, and that these benefits must be balanced with individuals’ data privacy rights and expectations.

These principles represent the University of Arizona’s commitment to be a privacy leader in the era of big data and information-sharing consistent with the overall teaching, research, and public service missions of the University. The principles outlined below will help guide the University as it looks to fulfill its goals.

The University defines **privacy** as: 1) The right to know, and in some cases, control what personal information is collected, tracked, processed, used, or disclosed, and for personal information to be protected appropriately; 2) The right to be able to conduct or be involved in activities without surreptitious observation; and 3) The right to associate with ideas or activities privately or at least without undue publicity.

The University defines **personal information** as: Information, that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual that has not otherwise been first made public by such individual. Personal information may include a variety of data elements, including but not limited to, personal identifiers, characteristics of protected classifications under state or federal law, education or financial records, biometric information, internet or other electronic network activity information, geolocation data, opinion, and other elements.

Privacy Principles:

1. **Privacy by Design** – The University is committed to making privacy a consideration in any University process or activity that involves personal information, and as much as possible, make appropriate access controls a default setting without requiring individuals to request limited privacy settings.
2. **Transparency and Notice** – The University provides reasonable advance notice to individuals about how and for what legitimate institutional or education purpose personal information is collected, used, or disclosed. The University will collect, use, and disclose only the minimum amount of information necessary to accomplish the stated purpose.
3. **Choice** –When possible, control over personal information should remain with individuals to allow for choice regarding the disposition of their information. The University will provide individuals with the opportunity to correct inaccurate personal information.
4. **Ethical Use** – The University is committed to respecting individual constitutional and civil rights and using personal information only as authorized by individuals from whom the information is collected, or as required or permitted by law. Use of individuals’ personal information by the University will be limited to education and mission-based institutional purposes.
5. **Responsibility** – The University is committed to protecting personal information by adopting privacy and information security controls and through employee training for how to responsibly collect, process, maintain, use, and disclose personal information.
6. **Accountability** – All University employees are stewards of the personal information for which they have been entrusted and have access and are accountable for knowing and applying these Privacy Principles.
7. **Future-Thinking** – The University is committed to being future-thinking, present-minded, and past-respectful in its privacy practices by monitoring changes in data privacy laws, regulations, trends, and perspectives, and adjusting University practices accordingly.