## AACSB INTERNATIONAL ACCREDITATION DOCUMENTATION CONFIDENTIALITY AND DATA PROTECTION POLICY

## Introduction

AACSB accreditation volunteers, including peer review team members, mentors, and accreditation committee members are provided access to accreditation reports for their assigned organizations, and these reports may contain personal data of individuals at the organization. Personal data accessible to accreditation volunteers includes any data which could identify a subject, including, but not limited to names, physical addresses, email addresses, and ID numbers. All personal data is to be treated confidentially by AACSB and its volunteers.

## **Confidentiality and Data Protection**

All documentation filed with AACSB by organizations involved in the accreditation process (initial or continuous improvement reviews) is considered the property of the organization filing the documents. AACSB will not release any of these documents without the written permission of the organization or as may be required by law. Furthermore, AACSB volunteers cannot modify any document submitted by an organization that is involved in an accreditation review process. This can only be done by the organization.

AACSB correspondence with an organization relative to accreditation matters is confidential between the organization and AACSB and the same rules apply. AACSB does not engage in communications with individuals who are not employees of the institution. Any exception requires CAO approval.

Such correspondence is often reviewed by accreditation volunteers who are or have been involved with the organization. AACSB and its volunteers will not share such correspondence outside of those formally involved unless the organization under review grants permission or as required by law.

As a natural extension of this, questions arise regarding what accreditation volunteers may do with accreditation documents which they have access to as a result of serving on a peer review team or an accreditation committee. As the documents are to be considered the property of the organization under review, sharing them with other parties not officially involved in the accreditation process is prohibited, unless written permission from the school is obtained. Upon completion of the assignment, AACSB accreditation volunteers are required to delete or destroy any documentation including personal data or return it to the organization.

## **Incident Notification**

When AACSB becomes aware of a breach of confidentiality, it shall: notify the organization about the incident without undue delay; cooperate with the organization; and assist the organization to respond and take suitable further steps in respect of the incident.

The term "incident" shall be understood to mean in any case:

- (a) a complaint or a request with respect to the exercise of a data subject's rights;
- (b) an investigation into or seizure of personal data by government officials, or a specific indication that such an investigation or seizure is imminent;
- (c) any unauthorized or accidental access, processing, deletion, loss or any form of unlawful processing of personal data;
- (d) any breach of the security and/or confidentiality of personal data leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, the personal data, or any indication of such breach having taken place or about to take place;
- (e) where, in the opinion of AACSB, implementing an instruction received from the organization would violate data protection laws to which the organization or AACSB is subject.

The notification should contain the following information as then known and shall be updated as additional material information becomes known: nature of the incident; possible categories and approximate number

of data subjects concerned; approximate number of personal data records concerned; the likely consequences of the incident; and a summary of the measures taken or proposed to be taken by AACSB to address the incident.

Statement of Agreement: By my signature below, I acknowledge that:

(a) I have received, read and understand this Confidentiality and Data Protection Policy; and

(b) I agree to comply in all respects with this policy.

Signature

Date Signed

Please print name

Effective Dates

The Confidentiality and Data Protection Policy is provided to signatories via electronic means and may be signed and returned electronically.

Alternatively, hard copies may be returned to:

Accreditation Services AACSB International 777 S. Harbour Island Boulevard, Suite 750 Tampa, Florida 33602-5730 Fax: +1 813 472 5530