




Procedure: Security Awareness Program Plan	
<b>Issue Date:</b> 1/1/2023	<b>Revision Date:</b> 1/1/2023
<b>Revision Number:</b> 1.1	<b>NIST Control:</b> AT
<b>Owner:</b> Director of Information Technology	

### Contents

- 1. Introduction ..... 1
- 2. Application of this Policy ..... 1
- 3. Types of Personal Information we Process..... 2
- 4. Sensitive Personal Information..... 3
- 5. How We Use Your Personal Information ..... 3
- 6. Disclosures of Your Personal Information ..... 5
  - 6.1. Agents, Service Providers and Suppliers..... 5
  - 6.2. Business Transfers..... 5
  - 6.3. Legal Requirements..... 5
  - 6.4. Centralized Data Processing Activities..... 6
- 7. Updating or Accessing Your Personal Information..... 6
- 8. Protecting Your personal information ..... 7
- 9. Changes to this Policy..... 7
- 10. Request for Access to Personal Information / Questions or Complaints..... 7

	<i>Employee Privacy</i>
Effective Date 1/1/2023	Version 1.0

## 1. Introduction

We are committed to safeguarding the privacy of the personal information that we gather concerning our prospective, current and former employees, faculty and staff (“you”, or “employee”) for management, human resources and payroll purposes.

Kentucky Wesleyan College is entrusted with personal information, often provided by our clients or other third parties. The policies and procedures defining employee’s responsibilities for safeguarding this information can be found in the Kentucky Wesleyan College Data Classification Policy, Data Classification and Handling Procedure, the Kentucky Wesleyan College Public Privacy Notice and any relevant work instructions.


As a Kentucky Wesleyan College employee (or prospective employee), you understand and acknowledge that we collect, use and disclose your personal information in accordance with this Privacy Policy for Employees (this “Policy”). This includes any information considered to be Sensitive Personal Information as described in Section Sensitive Personal Information or is considered to be financial information. Unless otherwise stated, all personal information we request from you is obligatory. If you do not provide and/or allow us to process all obligatory personal information as requested, we will not be able to keep complete information about you, thus affecting our ability to accomplish the purposes set out in Section How We Use Personal Information.

## 2. Application of this Policy

This Policy applies to employees’ personal information and to the use of that personal information in any form – whether oral, electronic or written. This Policy gives effect to Kentucky Wesleyan College’s commitment to protect your personal information.

In order to fulfill Kentucky Wesleyan College’s legal and contractual obligations, your personal information may be disclosed for human resources administration purposes.


While this Policy is intended to describe the broadest range of our personal information processing activities globally, those processing activities may be more limited in some jurisdictions based on the restrictions of their laws. For example, laws of some countries may limit the types of personal information we can collect or the manner in which we process that personal information. In those instances, we adjust our internal policies and / or practices to reflect the requirements of local law.

	<i>Employee Privacy</i>
Effective Date 1/1/2023	Version 1.0

### 3. Types of Personal Information we Process

The term “personal information” in this Policy refers to information that does or is capable of identifying you as an individual. The types of personal information that we process (which may vary by jurisdiction based on applicable law and the nature of the employee’s position and duties) include:

- name, gender, home address and telephone number, date of birth, image, biometric information, marital status, emergency contacts;
- residency and work permit status, military status, nationality and passport information;
- social security or other taxpayer identification number,
- bank account numbers;
- sick pay, pensions, insurance and other benefits information (including the gender, age, nationality and passport information for any spouse, domestic partners, minor children or other eligible dependents and beneficiaries);
- date of hire, date(s) of promotions(s), work history, technical skills, educational background, professional certifications and registrations, language capabilities, training courses attended;
- physical limitations and special needs;
- records of work absences, vacation entitlement and requests, salary history and expectations, performance appraisals, letters of appreciation and commendation, and disciplinary and grievance procedures (including monitoring compliance with and enforcing Kentucky Wesleyan College policies);
- where permitted by law and proportionate in view of the function to be carried out by an employee or prospective employee, the results of credit and criminal background checks, the results of drug and alcohol testing, screening, health certifications, driving license number, vehicle registration and driving history;
- information required to comply with laws, the requests and directions of law enforcement authorities or court orders (e.g., child support or debt payment information);
- acknowledgements regarding Kentucky Wesleyan College policies, including ethics and/or conflicts of interest policies and computer and other corporate resource usage policies;
- information captured on security systems, including Closed Circuit Television (CCTV) and key card entry systems and other security and technology systems, to the extent permitted by applicable law;
- voicemails, emails, correspondence and other work product and communications created, stored or transmitted by an employee using Kentucky Wesleyan College’s

	<i>Employee Privacy</i>
Effective Date 1/1/2023	Version 1.0

computer or communications equipment. Correspondence exchanged using Kentucky Wesleyan College's equipment but using personal addresses is only processed to the extent permitted by applicable law;

- date and reason for resignation or termination, information relating to administering termination of employment; and
- any other relevant data that could be necessary to comply with Kentucky Wesleyan College's purposes.

Much of the personal information we process is information that you knowingly provide to us. However, we may also process personal information that we are able to infer about you based on other information you provide us or during our interactions with you. We may also process personal information about you that we receive from a third party.

Much of the personal information we process is information that you knowingly provide to us. However, in other instances, we process personal information that we are able to infer about you based on other information you provide to us or during our interactions with you, or personal information about you that we receive from a third party using a process that we have told you about.


#### 4. Sensitive Personal Information

There may be instances in which personal information is considered Sensitive Personal Information under the privacy laws of some countries. Those laws define Sensitive Personal Information to mean personal information from which we can determine or infer an individual's racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, membership in a trade union or professional association, physical or mental health or condition, genetic data, sexual life or judicial data (including information concerning the commission or alleged commission of a criminal offence). We only process Sensitive Personal Information in your jurisdiction if and to the extent permitted by applicable law.

#### 5. How We Use Your Personal Information

Depending on the respective country and applicable laws, we may collect, use and disclose personal information concerning employees in order to:

- evaluate applications for employment;

	<i>Employee Privacy</i>
Effective Date 1/1/2023	Version 1.0

- manage all aspects of an employee's employment relationship, including, but not limited to, payroll, benefits, corporate travel and other reimbursable expenses, development and training, absence monitoring, performance appraisal, disciplinary and grievance processes and other general administrative and human resource-related processes;
- develop manpower and succession plans;
- maintain sickness records and occupational health programs;
- protect the safety and security of Kentucky Wesleyan College guests, staff and property (including controlling and facilitating access to and monitoring activity in secured premises and activity using Kentucky Wesleyan College resources);
- investigate and respond to claims against Kentucky Wesleyan College, its staff and its guests;
- conduct employee opinion surveys and administer employee recognition programs;
- administer termination of employment and provide and maintain references;
- maintain emergency contact and beneficiary details and
- comply with applicable laws (e.g., health and safety), including judicial or administrative orders regarding individual employees (e.g., garnishments or child support payments).


There are CCTV cameras in operation within and around our offices and other premises, which, depending on the respective country and applicable laws, may be used for the following purposes:

- to prevent and detect crime;
- to protect the health and safety of Kentucky Wesleyan College guests and staff;
- to manage and protect Kentucky Wesleyan College's property and the property of Kentucky Wesleyan College's staff, guests and other visitors; and
- for quality assurance purposes, to the extent permitted by applicable law.

We may monitor Internet use and communications in accordance with applicable laws and Kentucky Wesleyan College's Acceptable Use Policy for Information Technology Resources and any other acceptable use policies that may replace, amend or supplement that policy from time to time.

We may monitor and record telephony calls in accordance with applicable laws and Kentucky Wesleyan College's data storage and retention policy, for training and quality assurance purposes.

We may retain certain personal information of employees after their employment ends for any residual aspects of the purposes set out above. We will only retain such personal information for as long as it is necessary and in all cases for no longer than permitted by Kentucky Wesleyan

	<i>Employee Privacy</i>
Effective Date 1/1/2023	Version 1.0

College's Document and Records Retention Standard and applicable law. Once retention of personal information is no longer necessary, that personal information will be destroyed in accordance with Kentucky Wesleyan College's Information Classification and Handling Standard.

## 6. Disclosures of Your Personal Information

### 6.1. AGENTS, SERVICE PROVIDERS AND SUPPLIERS


Like many businesses, from time to time, we outsource the processing of certain functions and/or information to third parties. Please note that when you apply for a position with us online, you may be transferred to a third-party site with whom Kentucky Wesleyan College has contracted to process your personal information on our behalf. When we do outsource the processing of your personal information to third parties or provide your personal information to third-party service providers, we oblige those third parties to protect your personal information in accordance with the terms and conditions of this Policy, with appropriate security measures.

### 6.2. BUSINESS TRANSFERS

As we continue to develop our business, we may buy or sell portions of our business or assets. In such transactions, employee information is generally one of the transferred business assets, and we may include your personal information as an asset in any such transfer. Also, in the unlikely event that we, or substantially all of our assets, are acquired, employee information may be one of the transferred assets.

### 6.3. LEGAL REQUIREMENTS

We reserve the right to disclose any personal information we have concerning you if we are compelled to do so by a court of law or requested to do so by a governmental entity, or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property in accordance with applicable laws. We also reserve the right to retain personal information collected and to process such personal information to comply with accounting, tax rules, regulations and any specific record retention laws.

	<i>Employee Privacy</i>
Effective Date 1/1/2023	Version 1.0

#### 6.4. CENTRALIZED DATA PROCESSING ACTIVITIES


Like most international businesses, we have centralized certain aspects of our data processing and human resources administration in accordance with applicable laws in order to allow us to better manage our business. That centralization may result in the transfer of personal information from one country to another. For example, some personal information concerning you will be transferred to and processed in the United States if you are employed or are a candidate for employment: (a) by any Kentucky Wesleyan College affiliate located outside of the United States; or (b) as an Executive Committee Member, Department Head or other key employee of any of our entities or affiliated hospitality businesses located outside the United States.

If you are being considered for a position with a Kentucky Wesleyan College office in a different country, some personal information concerning you will be transferred to the country where the job opening is located. With your consent, personal information concerning you may also be transferred to managers and/or human resources staff of Kentucky Wesleyan College affiliates in other locations in accordance with applicable laws in order for them to be able to contact you with respect to applying for a different position. The jurisdictions to which the information will be transferred may or may not have laws that seek to preserve the privacy of personal information. However, whenever your personal information is transferred within Kentucky Wesleyan College, your personal information will be processed in accordance with the terms and conditions of this Policy and applicable laws.

### 7. Updating or Accessing Your Personal Information

With some limited exceptions, you may enquire about the personal information we maintain about you by sending us a written request by letter or email to the address set out in 'Request to Access Your Personal Information' below

You may request that we correct, delete or stop processing, personal information that we hold about you by sending a letter or email to the address set out in 'Request to Access Your Personal Information' below. If we agree that the information is incorrect, or that the processing should be stopped, we will delete or correct the information. If we do not agree that the information is incorrect, we will tell you that we do not agree and record the fact that you consider that information to be incorrect in the relevant file(s).

	<i>Employee Privacy</i>
Effective Date 1/1/2023	Version 1.0

## 8. Protecting Your personal information

We store the personal information we collect from you in databases protected by a combination of physical and logical controls. We require our third-party processors and service providers to employ similar controls. Such security measures, however, cannot prevent all loss, misuses or alteration of personal information, and we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted by law. Where required under law, we will notify you of any such loss, misuse or alteration of personal information that may affect you.

## 9. Changes to this Policy

Just as our business changes constantly, this Policy may also change. To assist you, this Policy has an effective date set out at the beginning of this document. Employees will be notified of any changes to this policy via email.

## 10. Request for Access to Personal Information / Questions or Complaints

If you have any questions about this Policy, about the processing of your personal information as described herein, or any concerns or complaints with regard to the administration of the Policy, or if you would like to submit a request (in the manner described in Section 5 above) for access to the personal information that we maintain about you, please contact us by any of the following means:

- For current employees, by contacting your manager or your human resources manager; or
- For applicants and former employees, by contacting Kentucky Wesleyan College's Data Privacy Officer at lkeller@kwc.edu.