

3354:1-43-05 Personal Information System Policy.

- (A) The College operates one or more personal information systems regulated by section 1347 of the Revised Code that contain personal information of College employees. The Vice President of People, Culture, and Talent Developments directly responsible for the system(s). For the purposes of this policy:
 - (1) "personal information" means any information that describes anything about a person, or that indicates actions done by or to a person, or that indicates that a person possesses certain personal characteristics, and that contains, and can be retrieved from a system by a name, identifying number, symbol, or other identifier assigned to a person.
 - (2) "System" means any group of related records maintained by the College and from which personal information can be retrieved by the name of the person or by some identifying number, symbol, or other identifier assigned to the person. System includes records that are manually stored and those stored through the use of electronic data processing equipment.

- (B) An employee who initiates or contributes to any disciplinary or other punitive action against another employee who brought to the attention of appropriate authorities, the press, or any member of the public, evidence of unauthorized use of information contained in a personal information system will be subject to disciplinary action pursuant to the College's corrective action procedure.

- (C) The accuracy, relevance, timeliness and completeness of personal information in a system will be monitored and maintained.

- (D) The College shall take necessary precautions to protect personal information in a system from unauthorized modification, destruction, use, or disclosure.

- (E) The College will periodically review its personal information systems and eliminate personal information that is no longer necessary and relevant, pursuant to applicable record retention schedules.

- (F) Upon request from and proper identification of an individual who is the subject of personal information in a system, the College shall:
 - (1) Inform the person of the existence of any personal information in the system of which the person is the subject.
 - (2) Permit the person or his legal guardian or an attorney who presents a signed Employee Request for Employee File or public records request to inspect all

personal information in the system of which the person is the subject.

- (3) Inform the individual about the types of uses made of the personal information including the identity of any users usually granted access to the system.
- (4) Provide digital copy of all documents stored in the employee file to the person upon request.

(G) Disputes concerning information in system

- (1) An individual may request, in writing, that the College investigate the status of personal information in a system that the individual believes is not accurate, relevant, timely, or complete.
- (2) The College shall investigate the matter within a reasonable time but no later than ninety calendar days after the request has been made to determine if the information is accurate, relevant, timely and complete.
- (3) The College shall notify the individual, in writing, of the results of the investigation and of the intended action of the College. The College shall delete any personal information that it cannot verify or that it finds to be inaccurate.
- (4) If the individual is not satisfied with the College decision, the College may do either of the following:
 - (a) Permit the individual to include within the system, a brief statement of the individual's position on the disputed information. The College shall maintain a copy of the individual's statement in the individual's employee file. The College may limit the statement to not more than one hundred words if the College assists the individual to write a clear summary of the dispute.
 - (b) The College shall include the statement in any subsequent transfer, report, or dissemination of the disputed information and may include with the statement of the individual a statement by the College that it has reasonable grounds to believe that the dispute is frivolous or irrelevant, and of the reasons for its belief.

- (c) The College shall, at the written request of the individual, furnish notification that the disputed information has been deleted, or furnish a copy of the individual's statement of the dispute, to any person specifically designated by the individual. (The College shall clearly and conspicuously disclose to the individual the individual's right to make such a request.)

- (H) The College shall comply with all applicable provisions of section 1347 of the Revised Code, whether or not explicitly set forth in this policy.

- (I) The President or the President's designee is hereby directed to take all steps necessary and appropriate for the implementation of this policy.

Effective Date: June 4, 2025

Prior Effective Date: December 15, 2005