

## CONFIDENTIALITY POLICY

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<b>Title:</b>	<b>Confidentiality Policy</b>
<b>Policy Number:</b>	GA 1/ 10. 2015
<b>Effective Date:</b>	October, 2015
<b>Issuing Authority:</b>	Administrative Council

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### 1. POLICY STATEMENT

In keeping with the principles of integrity and accountability, the Rafik Hariri University (RHU) is strongly committed to protecting the privacy of its students and employees and the confidentiality of related data. In the course of employment or service period, employees at various levels of responsibilities have access to confidential information. It must be known to all that all personal information to which one has access are the property of RHU and divulging confidential information that is not subject to public disclosure under Lebanese law without due authorization is strictly prohibited. This policy governs the responsibilities and expected behaviors of all RHU constituencies - faculty, staff, student workers, and affiliates - in handling confidential information they have generated or accessed while employed or on a special work assignment at RHU.

### 2. DEFINITIONS

- a) Confidential information: Any fact or data contained in a document, file or database in any form (hard copy or digital) that are generated by RHU.
- b) University Employee: A person employed by RHU to perform academic or non-academic duties or services.
- c) Affiliate: An individual or entity contracted to provide services to the University on a temporary basis.
- d) Confidential Information includes, but is not limited to: any personally-identifiable student and parent records, financial records (including ID and credit card numbers), health records; contracts, research data; alumni and donor records; University financial data; computer passwords, University proprietary information/data; and any other information for which access, use, or disclosure is not authorized by: 1) Lebanese law; or 2) University policy operations.
- e) Integrity: the principle of refraining from committing a confidentiality breach even if the culprit would remain anonymous.
- f) Accountability: Refers to principle of holding the committer of a breach to account.

### 3. POLICY

Everyone who works for or is affiliated with RHU and is authorized by the University to have access to confidential information or computer resources must sign a confidentiality agreement by which he/she pledges to use the information or data exclusively for University business, to preserve the security and confidentiality of the information, and to comply with all applicable Lebanese laws and University policies and guidelines thereof. At no time shall anyone attempt to access information that is not needed to perform his/her duties without explicit authorization.

All users with access to the University data and information must read, understand and comply with the Information Technology's policies in performing their duties and services.

The fundamental principles that govern confidentiality at RHU are summarized below:

- a) Current and prospective employees and affiliates are required to sign applicable Confidentiality Agreements at the start of employment.
- b) Access to confidential information contained in documents and files (print and digital) is conditional to having explicit authorization and only on a need-to-know basis.
- c) Using University resources to obtain, store or transmit confidential information without University authorization is strictly prohibited.
- d) Divulging confidential information in any form to anyone, group or entity, inside or outside RHU, is forbidden unless authorized to do so.
- e) No one at any time is to use confidential information for personal purposes.
- f) All University employees and affiliates are responsible to take appropriate measures to ensure that information entrusted to them is securely protected.
- g) A University employee or affiliate must at the end of an employment contract return all records and files containing confidential information to the University and refrain from divulging any confidential information after leaving the University.
- h) Confidential information that are no longer to be kept must be appropriately disposed of.
- i) Accessing, examining, copying, removing or retrieving confidential information without authorization is forbidden.
- j) Anyone working for RHU has the duty to report any breach of confidentiality to his/her supervisor immediately.

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#### **4. BREACH OF CONFIDENTIALITY**

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Violation of this policy is grounds for disciplinary action as follows:

1. A breach of confidentiality by a University employee or student worker will result in disciplinary action up to and including termination of employment. Student workers may also be subject to disciplinary action under the Student Code of Conduct.
2. A breach of confidentiality by an affiliate will result in immediate revoking of authorized access to confidential information and termination of working arrangement and/or contractual agreement.
3. Depending on the extent of the confidentiality breach, a University employee or affiliate may be subject to criminal prosecution under Lebanese laws.

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#### **5. ADMINISTRATION**

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The offices of the VP for Financial and Administrative Affairs and the VP for Development and IT are responsible to develop related procedures to ensure effective implementation of this policy. University units may develop and implement confidentiality policies based on specific needs and nature of the service provided so long those policies conform to the University's Confidentiality Policy.

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#### **6. STAKEHOLDER IMPACT AND SCOPE**

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This policy protects the integrity of its constituencies, reinforces due-process, promotes the culture of trust, and reduces future conflicts.

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#### **7. RELATED DOCUMENTS**

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- Job Responsibilities.
- Confidentiality Agreement Form.
- Faculty handbook
- University catalog

## 8. APPROVAL AND REVIEW

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The stakeholders who reviewed and approved the policy are:

1. Policy proposed by the Office of the VP for Academic Affairs
2. Reviewed and forwarded by: \_\_\_\_\_
3. Colleges
4. Academic and Administrative units

## 9. FINAL APPROVAL

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**Approved by RHU Administrative Board on October 22, 2024**

## Confidentiality Agreement

### Employee/Student/Volunteer

In the course of my work for Rafik Hariri University ("University") as an employee/student/affiliate, I may have access to confidential information regarding the University, faculty, staff, students, parents, alumni, vendors, and/or other affiliate with a program. The access to the confidential information may be verbal, print, digital and may include, but is not limited to, academic, medical/health, financial, employment, contractual, or institutional data.

I hereby affirm that I will not in any way access, use, remove, disclose, copy, release, sell, loan, alter or destroy any confidential information except as authorized within the scope of my duties with Rafik Hariri University. As an employee/student/volunteer, I must comply with applicable Lebanese laws and University policies. I have a duty to safeguard and retain the confidentiality of all confidential information. Upon termination of my affiliation with Rafik Hariri University, or earlier as instructed by the University, I will return to the University all copies of all materials containing confidential information.

I understand that I will be held accountable for unauthorized disclosure or misuse of confidential information, including the failure to safeguard my information access codes or devices. My obligations under this Agreement are effective as of this day and will continue after my affiliation with Rafik Hariri University concludes. Violation of these rules will result in discipline, which may include, but is not limited to, discharge from employment, expulsion from the University and or criminal prosecution under appropriate Lebanese laws.

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Signature

\_\_\_\_\_  
Printed Name and ID

\_\_\_\_\_  
Date