

UNC Data Minimization Principle for Data Shared with Vendors and Other External Entities

Purpose:

Establish guidelines for responsible sharing of data with external entities (e.g., third-party software vendors), ensuring that data sharing is carried out in accordance with the data minimization principle to safeguard individuals' privacy rights and minimize risks associated with unauthorized access and/or misuse of data.

These guidelines pertain to projects/requests that have been vetted and approved and involve sharing data with an external party. For such projects/requests, we should make reasonable effort to limit the data sharing, both in terms of what data elements should be provided and for whom those data elements should be provided. These guidelines do not supersede other policies/guidelines that must be considered when sharing data (FERPA, HIPAA, etc.)

Practice:

The following principles guide UNC's data sharing practice:

- Data shared with third parties should be limited to only the data that is directly relevant and necessary to achieve the original specific purpose of the sharing.
- File specifications should be reviewed to determine for which fields data will be provided, with specific scrutiny on potentially sensitive or non-directory information not directly relevant to the purpose of the data sharing.
- If the purpose of the data sharing has evolved, the updated purpose should be formally reviewed and approved before updating the data feed. To the extent possible, the review and approval of the changes will mirror the original review/approval process for the data sharing agreement.