



Healing Hands School of Holistic Health
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Healing Hands School of Holistic Health policy for compliance with the Gramm-Leach-Bliley Act [GLBA] For more information please contact us at: contactus@hhs.edu

ABOUT: The Gramm Leach Bliley Act was passed by Congress in 1999 and is enforced by the Federal Trade Commission. This act, also known as GLBA, is a federal law that protects customer's nonpublic personal information, otherwise known as NPI. NPI is any personally identifiable financial information a customer provides to obtain a financial service or product. Examples of NPI include social security numbers, credit card numbers, account balances, tax return information, driver's license numbers, and dates of birth. GLBA dictates several specific requirements and is comprised of two categories: the Financial Privacy Rule and the Safeguards Rule. Colleges and universities are deemed to be in compliance with the Financial Privacy Rule of GLBA if they are in compliance with the Family Educational Right and Privacy Act, commonly known as FERPA. GLBA ACT The Gramm Leach Bliley Act is a federal act that schools must adhere to. Specifically, the protection of non-public personal information or NPI. Here we describe what NPI is and how we must protect it. However, higher education institutions are subject to the Safeguards Rule Act related to the administrative, technical, and physical safeguarding of consumer information. The purpose of this is rule is to ensure our school is protecting our students. As a result, whenever we are handling any NPI, we adhere to the following rules, regardless if the data is in physical, digital or oral format.

Healing Hands GLBA guidelines:

- We use only authorized systems to enter, process or store NPI. We do not copy or store NPI to unauthorized systems.
- We do not use NPI systems for non-work related or unauthorized activities, such as surfing personal websites, reading personal email or chatting with someone online. Activities such as these can expose customer data to great risks.
- We limit access to customer information to only authorized personnel who have a business need to see it.
- The transfer of NPI must use secure, authorized methods, including the use of encryption.
- Any NPI related information is protected by passwords.
- When we collect information online directly from customers, we make sure the transmission is automated. We caution customers against transmitting sensitive data, like account numbers, via email or in response to an unsolicited email or pop-up message.
- We refer calls or other requests for customer information to designated individuals who have been trained in our institution safeguards of personal data. GLBA protects "any individual who obtains, from a financial institution, financial products or services which are to be used primarily for personal, family or household purposes, and also means the legal representatives of such an individual." (See 15.U.S.C. § 6809(9)). It may

seem odd for our school to be considered as a financial institution, but remember we provide an extensive amount of financial services, such as helping students with student loans. This requires us by Federal law to ensure the safeguarding of any NPI.

- We store NPI records in a room or cabinet that is locked when unattended.
- All physical and electronic NPI that is no longer necessary or appropriate to store must be properly destroyed, shredded or rendered unreadable.
- If needed, we immediately report any lost or stolen NPI to our information security team.

By following these steps, we ensure our organization is not only secure but compliant.