

# SOUTH DAKOTA SCHOOL OF MINES & TECHNOLOGY

## Policy Manual

**SUBJECT:** Unified Database

**NUMBER:** Policy I-06

**REVISED:** August 2022

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### Background

Employees of the university, the South Dakota Mines Center for Alumni Relations and Advancement and the Hardrock Club have access to information in a jointly operated database (“Unified Database”) to coordinate and advance the missions of all three organizations in a mutually beneficial way.

### Database Contents and Authorized Use

The Unified Database will be the sole database used for development activities and contact information for alumni communications. University employees with access to the Unified Database will not develop or use alternative databases for the purposes of alumni communication or development.

The Unified Database includes private information intended solely to support the missions of the University, the Center for Alumni Relations and Advancement (CARA) and the Hardrock Club (HRC). The Unified Database and its contents will not be shared or disclosed to any unauthorized user or used for any purpose other than to advance the missions of these organizations.

### Governance

The Database Management Group (DMG) shall include at least one representative each from the university and HRC and at least two representatives from CARA. The President shall designate a representative to the DMG. The DMG shall:

- Provide senior level oversight and policy governance of the Unified Database
- Develop, propose, approve, and implement standard procedures, practices, and patterns of use that improve the quality and utility of the Unified Database
- Approve and oversee implementation of procedures for designating Primary Points of Contact pursuant to paragraph 13 below

- Fully and currently share information about potential unauthorized use with other parties
- Review, recommend and implement improvements to training, procedures, maintenance, and software
- Discuss and resolve matters related to the day-to-day operation of the Unified Database
- Recommend and approve criteria for inclusion of non-alumni, or groups of non-alumni for potential inclusion in the Unified Database
- Coordinate updates of the database including importing data on new graduates
- Recommend changes to the Database Access Table, attached to this Policy as Exhibit A, to the governing entities of the university, CARA and HRC
- Maintain and use standardized non-disclosure agreement and retain signed copies as appropriate
- Develop and maintain standard practices for opt-out, do not mail and do not call requests and record such requests in the Unified Database
- Periodically review and recommend changes in governance, policy, and procedures to their respective executive leaders and governing entities
- Coordinate training on Unified Database management and use
- Serve as alternate or substitute DMG members for the other DMG members to cover temporary or short-term absences. In addition, each Party may designate up to two alternate or substitute DMG members to receive training and provide back-up in the event of temporary absences.

In the event that the DMG cannot resolve a matter important to one or more entities, the matter will be brought to the attention of the University President, the CARA Chair of the Executive Committee, and the Vice President of the Hardrock Club for resolution.

## **Private and Proprietary Information**

The Unified Database shall be managed jointly by the university, CARA, and Hardrock Club. The contents of the database shall be the property of CARA.

All Unified Database information, including any partial or complete compilation, is private and proprietary and shall remain so when shared with or provided to other persons or entities. Disclosure of information in the Unified Database that is not authorized by this policy shall constitute an impermissible release of personal information under South Dakota law. The information in the Unified Database shall remain private property and shall be provided with protections from public release and unauthorized use.

The Unified Database shall be protected to the same standard as other university databases.

The data, data compilations, data maintenance, analysis, and reporting stratagems associated with the Unified Database are proprietary information and trade secrets, as recognized by South Dakota law, and shall be protected from disclosure.

In accordance with SDCL §§1-27-1.5 and 1-27-30, the university will exclude from the database, or exclude from inspection and copying, and exclude release to any person or entity, any personal information in the university's records regarding any student, prospective student, or former student other than routine directory information, as well as any personally identified private citizen account payment information, credit information or other information supplied in confidence.

The university will exclude from release correspondence, memoranda, calendars, or logs of appointments, working papers, and records of telephone calls of public officials or employees related to the Unified Database. Records arising from the day-to-day interaction among employees of the university and its affiliated entities, including through the Unified Database, are excluded from disclosure.

## **Authorized Access**

The President shall designate a DMG member who will have full access to the Unified Database and will manage access to the database by other university employees and agents.

University employees have access to the Unified Database in accordance with the database access table, Attachment A, and this policy.

Employees or agents of the university shall complete the appropriate confidentiality and non-disclosure agreement before being given access to the Unified Database or to exported information from the database.

Completed confidentiality and non-disclosure agreements are maintained on file by CARA.

Employees shall receive initial orientation training on the Unified Database before being given access. Additional training will be completed as required.

### **Access Management**

The university DMG member shall manage opt-out, do not call, and do not mail requests for the university in accordance with the standard practices established by the DMG

If the university DMG member has reason to believe that an employee has used the Unified Database for an unauthorized activity or released information in the Unified Database contrary to policy, the DMG shall suspend the access of the employee until the matter is resolved and immediately inform the University President, CARA CEO, and Hardrock Club President.

Potential unauthorized use will be immediately reported to the Database Management Group and the University President.

The university shall be authorized to disclose information in the database if and to the extent that such disclosure is necessary to protect the health, safety, or property of any person. The constituent whose information was so disclosed shall be notified of that disclosure as promptly as practicable.

### **Primary Points of Contact**

If a record in the Unified Database is assigned a Primary Point of Contact for the purposes of development, employees shall not contact or communicate with that individual, corporation, or foundation for the purposes of development without coordinating with the Primary Contact in advance.

At their sole discretion, Primary Points of Contact for donors may further limit access to particularly private or sensitive information in the Unified Database. However, general directory information on alumni will remain available to all authorized users. Authorized users may request access to limited access information from the Primary Point of Contact if users have a need to know.

### **Data Maintenance**

Unified Database users and employees who are provided database exports shall improve the quality of the information in the Unified Database by forwarding updated contact

information to the DMG for inclusion in the database and by making input directly to records regarding contact and communication at their level of authorized access.

**Revision History: Office of the President, January 2015; CARA, August 2022**