

Protection of the Institution's Technical Infrastructure

Scope:

The purpose of the plan is to provide an overview of the security requirements of the system, protect the information and systems that support the operations and assets of the facility, provide confidentiality and protect information from unauthorized access and disclosure, describe the controls in place, and list responsibilities and expected behavior of all individuals who access the system. It is a core component to ensure that the privacy, safety and security of data is maintained.

Major Activities:

1. Security Requirements Checklist

a. Technical Infrastructure

- SonicWall TZ00W Firewall/Gateway Antivirus
- Untangle Internet Gateway (Antivirus/AntiSpam/AntiPhish)
- CrashPlan Pro Business Cloud Backup
- Spin AI Cloud Backup
- BitDefender Endpoint Security
- ManagedMethods Google CASB

2. Cyber Plan Action Items

a. Train employees to recognize social engineering using KnowBe4 Social Engineering Training

- Protect against phishing
- Don't fall for fake antivirus offers
- Protect against malware
- Be aware of spyware and adware
- Develop a layered approach to guard against malicious software
- Verify the identity of telephone information seekers

b. All staff participate in an Awareness Training on cybersecurity.

3. Student Records/Transcripts

The student files contain registration information, tuition payment information, aptitude test scores, any other correspondence and are maintained online using the SMART Student Information System. Students may review their files by contacting the School Director. A student copy of a transcript or educational verification is available upon request, within two weeks of written request date, providing all financial obligations to the School have been met.

4. Family Educational Rights and Privacy Act (FERPA).

PC AGE complies with the Family Educational Rights and Privacy Act of 1974 (FERPA) to ensure the right of the student and certain parties to have access to the information contained in the file. The personally identifiable information will not be released to a third party without the student's written consent. The privacy of information found in student files is maintained by keeping them in a secure cabinet in a secured area.

5. Employee and Student Files Safety

PC AGE Career Institute is housed in a building with a centralized fire alarm system and security system. The school stores current student academic, financial, and payment records in locked rooms in cabinets with limited access. Electronic data including students' records are stored in SMART SIS and backed up regularly. The school accountant also retains duplicates of financial reports, tax records, and other corporate financial records. In the event of replacing technical infrastructure, secure disposal of equipment will include witnessing the destruction of all private information prior to equipment disposal.

All employee files are maintained by the accounting department. Files are kept in locked cabinets in the Compliance Director's office. Only authorized staff members can access the files.

Evaluation of Plan:

PC AGE appreciates and utilizes input from both students and employees. The Management Team reviews summaries of evaluations and reviews/revises plans, policies and procedures as warranted during annual staff meeting and shares with the Advisory Committee. All plans are available to staff and students on the school's website.

Stakeholders:

School Director, Accounting Manager, Director of Compliance, Director of Education