

MEDICAL CAREER COLLEGE OF NORTHERN CALIFORNIA

Safeguarding Customer Information

MCCNC participates in **Financial Student Aid** and therefore insures that all consumer information is safeguarded. ***Under the FTC regulations: 16 CFR 313.3(n) and 16CFR 314.1-5 Gramm-Leach-Bliley Act: Sections 501 and 502(b)(2) U.S. Code 15 USC 6801(b). 6805(b)(2)***, this requirement applies to all nonpublic personal information in the school's possession (from students, parents, or other individuals with whom the school has a customer relationship). It also pertains to the customers of other financial institutions that have provided such information.

MCCNC has established and maintains a comprehensive information security program. This policy includes the administrative, technical and physical safeguards the school uses in order to maintain consumer information security. The program includes:

- Insuring the security and confidentiality of consumer information
- Protects against any anticipated threats or hazards to the security or integrity of such information, and;
- Protects against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any consumer

Designated coordinators of this program are the ***School Director, Director of Admissions and Financial Aid Officer***. MCCNC's Information Security Program assesses any reasonably foreseeable internal and external risks to security, confidentiality and integrity of consumer information that could result in the unauthorized disclosure, misuse, alteration, destruction, or other compromise of such information, and assesses the sufficiency of any safeguards in place to control these risks. MCCNC's risk assessment includes consideration of risks in each relevant area of operations including:

- Employee Training
- Management Information Systems, including network and software design, as well as information processing, storage, transmission and disposal
- Detecting, preventing and responding to attacks, intrusions, or other system failures

MCCNC has implemented safeguards to control the risks it identifies through risk assessment and regularly tests and monitors the effectiveness of the safeguards key controls, systems and procedures.

MCCNC evaluates and adjusts its information security program in light of the results of the required testing and monitor, as well as for any material changes to its operations or business arrangements or any other circumstances that it has reason to know may have a material; impact on the school's information security program.

MCCNC takes reasonable steps to select and retain service providers that are capable of maintaining appropriate safeguards for the consumer information at issue and requires the service providers by contract to implement and maintain such safeguards.