



PHI THETA KAPPA
HONOR SOCIETY

PHI THETA KAPPA COLLECTION AND USE OF STUDENT DATA

What Does Phi Theta Kappa (PTK) do to Protect Student Data?

- PTK provides each Institution's chapter advisor with a unique login and password for a secure and encrypted connection to PTK's web applications.
- The Institution's chapter advisor(s) will upload eligible student contact data using software designed and supported by PTK. PTK provides technical assistance to chapter advisors to resolve any issues before, during, and after the upload process.
- The contact data uploaded by the colleges generally includes the student's name and email address. All data uploaded to PTK by the Institution is subject to one or more of the following:
 - The Institution's definition of directory information (as defined under FERPA).
 - Criteria contained within any existing Data Sharing Agreement between the Institution and PTK ("Data Sharing Agreement").
 - In some cases, Institutions elect to send their own invitations, thus eliminating the need for data uploads and/or a Data Sharing Agreement.
- Using the contact information provided by the Institution's chapter advisors, PTK distributes invitations via email and other communications to students at the Institution to become members of PTK. These communications provide each student with a unique code that allows the student to choose whether to accept the PTK membership. If accepted, the student pays a one-time fee online through a secure and encrypted connection.
- During the membership-acceptance process, students must agree to the membership terms agreement. This agreement relates to the student's consent to PTK disclosing their contact information to four-year university and college recruiters (for purposes of scholarship and recruitment opportunities), and business/industry partners (for purposes of job recruitment opportunities). If a student does not consent to release his or her contact information in this manner, then PTK will not share the information. A copy of PTK's membership terms and conditions is located at this link for subsequent and external review: <https://www.ptk.org/membershiptermsandconditions/>
- Members who agreed to share their information with four-year university and college/industry employment recruiters during the membership acceptance process, and later decide they do not wish their information to be shared, may log into their membership dashboard, and opt-out of data sharing, and all other types of communications from PTK and its partners, at any time. (Also see "How Does PTK Use Student Data?" below)
- PTK provides invitations to students eligible for membership on behalf of the Institution free of charge.



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How Does PTK Use Student Data?

The Family Educational Rights and Privacy Act (FERPA) permits the Institution to disclose student education records, or personally identifiable information from such records to organizations like PTK to whom the Institution has outsourced institutional services or functions. Additionally, the Institution may disclose information that it has designated as directory information.

To achieve the outcomes of protecting student data subject to FERPA, PTK membership invitations require only directory information from colleges, or in some cases, a signed Data Sharing Agreement between PTK and the Institution. If your institution would like a Data Sharing Agreement, please request one.

- 1. Definition of Student Data.** All student education records, and the personally identifiable information contained in those records, subject to FERPA provided by the Institution and its chapter advisor(s) to PTK shall be deemed “Student Data.”
- 2. Collection of Student Data.** PTK will only collect Student Data necessary to fulfill its duties to issue student invitations.
- 3. Use of Student Data.** PTK will use Student Data to invite students to join the PTK Honor Society (“Society”). PTK will not use Student Data for any purpose other than invitations to accept membership in the Society.
- 4. Access to Student Data.** Student Data will be accessed only by authorized employees of PTK and by the Institution’s chapter advisor(s). All access to this data is secure and encrypted.
- 5. Sharing of Student Data.** PTK will not share Student Data with any additional parties.
- 6. Sharing of Membership Data.** During the process of becoming a member, PTK will ask students whether they consent to PTK disclosing their contact information, education goal and degree type, and other demographic information (educational level goal, expected date of graduation from the two-year, dual enrollment status, veteran status, interest in online programs) collected during the membership acceptance process to four-year university and college recruiters (for purposes of scholarship and recruitment opportunities), and business/industry partners (for purposes of job recruitment opportunities). The membership terms and conditions is presented to the student for verification during the membership acceptance process. A copy of that agreement is located here for subsequent and external review: <https://www.ptk.org/membershiptersandconditions/>

If a student does not consent to release his/her/their contact information in this manner, then PTK will not share the information with its four-year university and college partners or business/industry partners.

- 7. Rights and License in and to Student Data.** All rights, including any intellectual property rights, relating to the Student Data, shall remain the exclusive property of the Institution. PTK has a limited access to Student Data provided by the Institution solely for the purpose of sending invitations to students to join the Society. PTK has no rights, implied or otherwise, to use Student Data for any other purpose.
- 8. Security of Student Data.** PTK will store and process Student Data in accordance with industry best practices. This includes appropriate administrative, physical, and technical safeguards to secure



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Student Data from unauthorized access, disclosure, and use. PTK will conduct periodic risk assessments and remediate any identified security vulnerabilities in a timely manner. Remote connections to PTK platforms are established through a secure encrypted SSL virtual private network (VPN) connection, and VPN is accessed through multi-factor authentication (MFA) methods.

9. PTK will promptly notify the Institution in the event of a security or privacy incident involving the Student Data.

Does PTK Address International Data Protection Requirements?

Yes. PTK's data governance program addresses international data protection requirements, including the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016).

Does PTK carry cyber insurance?

Yes, PTK maintains a cyber insurance policy.



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