

Memorandum of Understanding Concerning
Scan of University Email Stores for Sensitive Data
April 13, 2012

The University and the AAUP-WSU agree to allow Computing and Telecommunication Services (CaTS) to perform a one-time sensitive data scan of the email stores located on the University email server. Email stored exclusively on individual computers will not be scanned.

Purpose of the Scan:

Wright State University is transitioning email to a hosted service. Sensitive data such as Social Security Numbers should not be stored in email, which is considered far less secure than network storage. In addition the University has moved away from an SSN-based system for identifying individuals to a UID-based system, making the SSNs no longer required for such identification. Cleaning up legacy data is a prudent measure to reduce the risk of sensitive data loss.

Customer Credit card numbers, per Wright Way policy 5003, are not to be stored in email. To maintain compliance with the PCI-DSS standard we are asking that all credit card information falling under these regulations be removed from the University email server.

Removing the instances of the above data before the University transitions to a hosted email system is important. It is likely to be extraordinarily difficult to scan for such data after it has left our network.

Scanning Procedures:

- The scan will search the subject and body of emails and all associated attachments.
- The data scanned for will be Social Security Numbers and Credit Card numbers.
- The scanning will be done by an automated process. CaTS personnel or other University personnel will not see the emails or attachments scanned.
- The chosen vendor will complete the scan without checking any of the results for false positives. Vendor technicians will not view the contents of the emails or attachments scanned.
- The results of this scan will be placed in a report indicating the account name and directory path of any emails, and associated attachments, which contain either social security numbers or credit card numbers.

- The account holders will be contacted individually with a request to investigate the emails identified and remove any sensitive data.

Proposed Timeline:

- The scan will be conducted between June 11, 2012 and July 11, 2012.
- If it is determined that a follow-up scan is needed it will be discussed with the Academic Services Committee, and if warranted, another MOU will be generated before any action is taken.

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