



Division of Information Technology

P.O. Box 6888
Radford, VA 24142
(540) 831-5173

Exception request for storing highly sensitive data on an individual-use device or a mobile device

Review Radford University's "Data Storage and Media Protection" policy. Storage and transmission of highly sensitive data is permitted only with an approved exception request. Before submitting a request, consider alternatives to storing or transmitting this data. Submit one exception request for each distinct business case. Multiple individuals or devices may be listed on this form, if necessary. For procedural questions, contact itsecurity@radford.edu.

Requester's name _____

Requester's Department _____

Requester's signature _____

Date _____

Type of device(s) _____

Name of user(s) (if different from requester) _____

Data elements to be stored (check all that apply)

Social Security number

Credit card number

Debit card number

Bank account number

Driver's license number

Passport number

Medical Information

Qualified combination of name (first name or first initial with last name) with date of birth (month, date, and year of birth) in a document

Justification - Please address all applicable questions (attach documentation as needed).

1. What is the business need for using this data? Are there alternate, less sensitive data elements that could be used (for example, using ID numbers instead of SSNs).

2. (If applicable): What is the business need to store data on an individual or mobile device? Are there alternate storage locations that are less vulnerable? (for example, storing data on a professionally managed and secured server?).

3. (If applicable): What is the business need to transmit data to/from an individual or mobile device?

4. Encryption of highly sensitive data is required on any individual-use or mobile device. What is the planned encryption? How will any data be recovered if encryption keys are lost? Explain any compensating controls if encryption is not possible.

5. Will this data be transmitted over the network? What is the plan for encrypting data during transmission? Explain any compensating controls if encryption is not possible.

Endorsements

Key individuals must endorse the exception request before approval is granted. The requester must collect and keep records of endorsements. These may be in paper format (signed or initialed) or in e-mail format. When the request is approved or denied, the individuals listed below will receive a copy.

Department head (name) _____

Dean or Vice President (name) _____

Information Security Officer (name) _____

Appropriate data owner names – List all those relevant to this request

Approval

When all the endorsements have been received, send the request to the Vice President for Information Technology/CIO (PO 6888)

____ Approved

____ Denied

Reason for denial:

Date _____

Danny Kemp (signature), Vice President for Information Technology/CIO