<table>
<thead>
<tr>
<th><strong>Privacy Management Framework</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>WWU Ethics and Compliance Program</strong></td>
</tr>
</tbody>
</table>

| **Govern** | • Establish institutional commitment and assign privacy responsibility.  
• Establish and maintain privacy policies and principles.  
• Develop, monitor, and report privacy performance metrics.  
• Monitor compliance. |
| **Identify** | • Understand agency mission and operating environment.  
• Understand applicable privacy laws, principles and cultural norms.  
• Identify internal sponsors, advocates, and partners.  
• Understand what, how, and why data is collected, used, and disclosed. |
| **Protect** | • Conduct privacy assessments.  
• Exercise due diligence before and after sharing data with third parties.  
• Implement security and privacy safeguards. |
| **Communicate** | • Train Staff  
• Conduct awareness activities.  
• Provide privacy notices. |
| **Respond** | • Respond to requests for individual participation.  
• Identify and respond to privacy incidents. |

**Adopted:** November 14, 2022