



Procurement U Privacy and Information Security Policy

Personal Information and Data Collection

Procurement U respects the privacy of all learners who utilize the Procurement U LMS. NASPO has adopted a Privacy Policy that governs the collection, use, and protection of personal data for all digital platforms, websites, and systems, including the Procurement U LMS. Procurement U staff will adhere to the guidelines of this policy in the administration of the Procurement U LMS. This policy is supplemental to NASPO's primary Privacy Policy, which governs broader data collection, use, and protection practices. Learners are encouraged to review the NASPO Privacy Policy for additional information. The NASPO Privacy Policy can be found [here](#).

Definitions

For purposes of this policy:

NASPO Primary Member means the Chief Procurement Officer, State Procurement Director, or equivalent of the central procurement office for a U.S. state, the District of Columbia, or a U.S. territory, consistent with NASPO's voting membership.

PPA Primary Member means the designated primary point of contact for an active Institutional Membership offered through the Procurement Professionals Alliance (PPA).

Institutional Member Organization means the agency, employer, association, institution, or other entity that holds an active PPA Institutional Membership.

Learning Management System (LMS) means the online platform used by Procurement U to deliver courses, maintain learner accounts, track participation and completion, and store related learner records and course data.

Learner Records Security, Access, and Release

Learner records will be maintained within the Procurement U LMS through the registration and completion of learning events. Records will be maintained in a secure manner with reasonable administrative and technical safeguards. Each learner must either create their own Procurement U account, or have an account created for them automatically by joining the Procurement Professionals Alliance (PPA). To help maintain accurate and up-to-date learner information, learners are generally expected to create their own accounts. In limited circumstances, the Procurement U team may assist with account setup or updates as needed for support or troubleshooting. Each learner will have their own login credentials within the LMS to securely access their individual information and records.

Learners may access their full learning records themselves through their LMS profile and transcript. Learners may also request a copy of their records by contacting the Procurement U team at procurementu@naspo.org. Depending on the information requested, learners may be asked to login to their account to access the information directly from their profile, or be asked to verify their account username, email address and/or agency/organization name to confirm their identity prior to release of the records.

If a learner believes their records are incomplete or inaccurate, they may contact the Procurement U team for assistance at procurementu@naspo.org.



To process account-related requests, learners must provide the email address(es) associated with their Procurement U account at the time of inquiry. Procurement U will use only the email address provided to locate and verify the account and will not suggest possible accounts based on name, employer, or other partial identifying information. The only exception is when the Procurement U team reasonably suspects that the learner entered the account email address incorrectly. In those cases, Procurement U may use additional identifying information provided by the learner, such as agency name, state, or phone number, to confirm the account.

The Procurement U team might also require confirmation of the email address associated with a learner's active PPA or NASPO membership. If that email address differs from the one associated with the learner's Procurement U account, the learner must provide all relevant email addresses to support verification and troubleshooting.

Multiple Procurement U accounts may be merged with written permission from the accounts' owner, and the request will be verified or confirmed with the learner before any action is taken.

Learner records including course completions, awarded CEUs, and transcripts, will be maintained within the LMS for a minimum of 8 years and may continue to be retained indefinitely for reporting and accreditation purposes. Records will generally only be accessible to the individual learner through their LMS profile. However, PPA Primary Members and NASPO Primary Members may submit a request to have relevant learner record information (e.g., transcripts, enrollment status, course participation) released for individuals currently covered under their applicable NASPO or PPA membership. Such disclosures are limited to information reasonably necessary to support training oversight, account administration, reporting, verification, or learner support. This exception applies only to individuals actively covered under the applicable membership at the time of the request and does not apply to other learners.

To request learner records, NASPO and PPA Primary Members must submit a new written request to procurementu@naspo.org each time records are needed. Each request must include: (1) a list of individuals whose records should be included, and (2) the specific course or courses for which records are being requested. Each individual listed must be currently employed by, affiliated with, or otherwise covered under the applicable NASPO or PPA membership at the time of the request.