

Columbia Business School eMail Retention, Forwarding and Access Policy

Columbia Business School (“CBS”) has adopted the following eMail retention and access policy (“Policy”) to define how long emails will be retained by the system, even if the user deletes a copy, and under what circumstances an email can be accessed by anyone other than the individual to whom the email account is assigned.

It shall be the policy of Columbia Business School that:

Email Access by Anyone Other Than the User

- 1- Email in the user’s email folder or archive may only be accessed by an individual other than the user under the following circumstances:
 - a. In response to a subpoena from any court or law enforcement or regulatory agency.
 - b. Upon receiving a directive from the University’s legal counsel.
 - c. Upon receiving a directive from the head of the school’s Human Resources department or their designee.
- 2- When a request is made for access, the user must be notified of the access by the requestor as soon as practical or authorized (e.g. some legal subpoenas may include a direction that their investigation is not to be disclosed to the user).
- 3- Actual access to a user’s email will be authorized only for the school’s email system administrators that serve in the Information Technology Group, or directly by the email host provider if they are given a subpoena to access and produce these email records. No other individual at the University shall be granted access, except as required by subpoena or law.

eMail Deletion

- 4- All emails that are received or sent by an authorized user at the school shall remain in that individual’s email folder until the individual decides to delete the email, except:
 - a. If the total storage in the email user’s online folder exceeds the storage limits of the system (currently 50Gb). In this case, the email may be sent to a separate secured online archive, that is still accessible by the user, but only from certain devices (such as their laptop or desktop, but currently, not their Smartphone or other mobile device)
 - b. If the email contains a virus, malware, or other code that poses a risk to the school’s system
 - c. Upon direction of the CIO, head of Human Resources or the Legal Counsel for the school, and only for good cause such as an email containing prohibited HIPAA, PII, or other sensitive data, or an email containing data that is not in compliance with the University’s general email use policy or law (emails that are criminal in nature etc.)

Forwarding eMails to Non-University eMail Accounts

- 5- All emails that are sent to a Business School email account should generally not be automatically forwarded to a non-University operated email server, however the following will be permitted:
 - a. For staff- Staff may forward a copies of individual emails to their personal non-University email account as long as the original email is not automatically forwarded from the University email server or automatically deleted from the University email server (it may be manually forwarded and manually deleted by the user at their discretion). Staff may not forward eMails to their personal non-University email account that contains confidential or sensitive information. Staff may not respond to forwarded emails from their personal email account for any University-related business except under extraordinary circumstances such as an email outage.
 - b. For faculty- Faculty may forward a copy of emails to their personal non-University email account and are encouraged, but not required, to keep the original email in the University email server for a reasonable period of time (it may be manually deleted by the faculty member at their discretion). Faculty that automatically forward and delete all University email to their personal email account must sign an acknowledgement that this is not a recommended practice and may need to assume direct financial liability for any legal fees related to email in their personal account (e.g. responding to subpoenas from law enforcement agencies for copies of their emails, litigation related to having personal or sensitive information in the faculty member's personal email account if the account is compromised, etc.). Faculty are encouraged (but not required) not to respond to forwarded emails from their personal email account for any University-related business except under extraordinary circumstances such as an email outage.
 - c. For adjuncts and students- Adjuncts and students may forward a copy of emails to a non-University email server and there is no restriction on saving a copy in the University email system and/or replying to University-related emails from their personal email accounts.

It should be noted that in the event the University receives a subpoena or other legal process requesting emails in a user's University email account, that the subpoenaing authority may be alerted to the personal email address where a faculty, staff, or student's emails are forwarded and that personal email account may then be subject to a separate subpoena delivered directly and individually to the faculty, staff, or student. If this were to occur, the University is not obligated to pay for the legal defense or other related fees associated with the user's compliance to the subpoena of their personal email account.