Updated May 2025

Focus Personal Training Institute

Gramm-Leach-Bliley Act (GLBA) Disclosure Policy

I. Purpose and Scope

Focus Personal Training Institute (FPTI) is committed to protecting the privacy and security of customer financial and personal information in accordance with the Gramm-Leach-Bliley Act (GLBA), codified at 15 U.S.C. §§ 6801–6809, and applicable implementing regulations at 16 CFR Part 314. As a Title IV participating institution, FPTI qualifies as a "financial institution" under the GLBA and is therefore required to implement a comprehensive written information security program.

This policy establishes the institutional safeguards used to protect covered data and information and applies to all operations involving the collection, storage, access, or dissemination of nonpublic personal information (NPI) of students, families, employees, or service providers.

II. Designated Program Coordinator

FPTI has designated the following individual as its Information Security Program Coordinator, responsible for implementation and ongoing management of the information security program under GLBA:

- **Name:** Gabriel Valencia
- **Title:** Executive Director
- **Phone:** (212) 319-3816
- **Email:** gvalencia@fpti.edu

III. Risk Assessment and Safeguards

FPTI performs regular risk assessments in line with 16 CFR 314.4(b) to identify reasonably foreseeable internal and external threats to customer information. These assessments inform administrative, technical, and physical safeguards designed to:

- Protect against unauthorized access or use of information;
- Ensure proper disposal of sensitive records;
- Address vulnerabilities in systems and operations;
- Monitor access to covered data.

Safeguards include, but are not limited to:

- Multi-factor authentication for system access;
- Encryption of data in transit and at rest;
- Role-based access controls;
- Secure physical storage for paper records;
- Continuous patching and malware defense protocols.

IV. Employee Training

All FPTI employees with access to customer information receive annual training on privacy, cybersecurity practices, phishing awareness, and breach response procedures in accordance with 16 CFR 314.4(e). Training logs are retained for audit purposes, and participation is mandatory for all new hires and contract personnel.

V. Oversight of Service Providers

FPTI requires service providers with access to covered data (e.g., loan servicers, student information systems, cloud vendors) to maintain GLBA-compliant safeguards. All service agreements include language binding vendors to:

- Implement appropriate security measures;
- Report any data breaches involving FPTI information;
- Cooperate with investigations and audits upon request.

VI. Incident Response and Breach Notification

FPTI maintains a written incident response plan (IRP) that is integrated into its broader WISP and includes:

- Procedures for containment, investigation, and notification;
- Incident documentation and post-mortem analysis;
- Internal notification to executive leadership;
- External reporting to the U.S. Department of Education within 30 days of discovery of any breach that involves Title IV-related information systems or NPI.

Reports must be submitted via:

- FSA Cybersecurity Breach Intake Form
- **Email:** FSA_IHECyberCompliance@ed.gov

VII. Annual Evaluation and Documentation

In alignment with 16 CFR 314.4(h), FPTI evaluates its information security program at least annually and updates it as needed due to technological or operational changes. The evaluation includes:

- Audit of risk assessments;
- Review of training records;
- Confirmation of service provider compliance;
- Incident log analysis.

Documentation is retained in accordance with federal audit and recordkeeping requirements.

VIII. Definitions

- **Nonpublic Personal Information (NPI):** Personally identifiable financial information that is not publicly available, including but not limited to social security numbers, financial aid data, and FAFSA application details.
- **Covered Data:** All student or employee data subject to protection under GLBA, FERPA, or state privacy regulations.
- **Service Provider:** Any third-party entity that receives, accesses, processes, or stores NPI on behalf of FPTI.

IX. Authority and Compliance

This policy is issued under the authority of the following:

- *Gramm-Leach-Bliley Act*, 15 U.S.C. §§ 6801–6809
- *FTC Safeguards Rule*, 16 CFR Part 314
- *U.S. Department of Education Guidance* (GEN-23-09, February 9, 2023)
- *34 CFR § 668.16(c)* — Administrative Capability Standard for Title IV Institutions

FPTI affirms its commitment to protecting the confidentiality and integrity of customer information and will revise this policy as necessary to remain in compliance with all applicable federal regulations.