

## **PRIVACY POLICY**

### **University of Findlay**

This Privacy Policy describes the information practices of the University of Findlay (referred to herein as “we”, “us”, or “our”). Please take a moment to read through this Privacy Policy so you understand how we collect, use, store, and share the information it collects from you, and your choices regarding our collection and use of such information.

This Privacy Policy applies to this website and any other online and mobile websites, blogs, social media pages, and mobile applications operated by the University of Findlay. The terms of this Privacy Policy apply to all users of those sites.

#### **What information do we collect?**

We collect information from you through various sources, including (1) information that you provide to us when you visit our sites or interact with us via e-mail or social media; (2) information automatically collected from all users of the sites through cookies or other similar methods; and (3) information obtained from other third-party sources and other publicly available sources.

Some of the information we collect is personally identifiable information that either identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“Personal Information”). This may include:

- Name, mailing address, telephone numbers, e-mail addresses, and other contact information;
- Account username, passwords, and other information that we require in order for us to authenticate and securely provide account access;
- Credit/debit card information, payment method, postal code, billing address, tax identification number, and other information necessary to process payments;
- Device geo-location, whether through latitude/longitude coordinates or derived from an IP address or other data that provides a city or postal code location;
- Operating system and browser used on your device, your internet service provider, regional and language settings, IP address, MAC address, device advertising ID, and other unique identifying information broadcast from your device when visiting our website. This allows us to remember your preferences, identify unique visitors to our sites, and helps us understand how users interact with us on their devices;
- Cookies, clear GIFs, web beacons, and other behavior-based tools that collect data on your views and engagement with our features, emails/advertisements, sites, and products (including the date and time the services are viewed and/or used, the internet address of the website from which you linked directly to the sites); and
- Contents of feedback, support requests, social media posts and interactions, and other messages you send to us.

#### **What do we use your information for?**

Any Personal Information we collect from you may be used in several ways, including providing our services to you and sending related communications, providing support to users, responding to feedback, questions, and comments, maintaining and protecting the security and integrity of our systems, improving our sites, advertisements, products, and services, sending marketing communications/promotional offers and serving you digital advertisements tailored to your interests (with your consent only), identifying you

when you visit our sites or locations; conduct analytics and other internal administrative purposes, and any other lawful purposes.

We also comply with the Family Educational Rights and Privacy Act (FERPA), which prohibits the release of education records of our students, except in limited circumstances, (e.g., with the student's permission, to parents of dependent students, and in response to a valid court order), and with the applicable provisions of the Health Insurance Portability and Accountability Act (HIPAA).

### **How do we store and protect your information?**

We store all information we collect, including Personal Information, electronically in our computer databases. We own, maintain, and operate our computer servers containing our databases. Access to our computer servers is controlled by firewalls and security gatekeepers. However, no method of electronically transmitting or storing data is ever completely secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. If we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

All credit card/payment information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Payment gateway provider's database, only accessible by those authorized with special access rights to such systems, and who are required to keep the information confidential. After a transaction, your private information (credit cards, social security numbers, financials, etc.) will not be kept on file for more than 60 days.

### **Do we use cookies?**

Yes, we use cookies and other tracking technologies, such as web beacons, to automatically collect information (including Personal Information) on all users. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser (if you allow) that enables the sites or service provider's systems to recognize your browser and capture and remember certain information.

We use cookies to recognize your device when you are using the sites, which makes your user experience online more customized and efficient, and to keep track of advertisements and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business. You do not need to enable cookies to visit our sites; however, some aspects of the sites may be difficult or impossible to use if cookies are disabled.

### **Do we disclose any information to outside parties?**

We do not sell Personal Information to third parties. However, in addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

- Service Providers. We share your information with third party service providers who help us to administer our sites, provide technical support, process payments, and facilitate certain features of our sites.
- Public. Some of our sites may provide the opportunity to post comments, or reviews, in a public forum. If you decide to submit information on these pages, that information may be publicly available.

- Other Disclosures with Your Consent. We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.
- Other Disclosures without Your Consent. We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the shipment of products to or the provision of services by a third party intermediary.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising or other uses.

### **Links to Other Websites**

Our sites may contain links to other third-party websites not owned, operated, maintained by, or related to the University of Findlay (“Third-Party Sites”). Any such hyperlinks are to be accessed at the user’s own risk. We are not responsible for the content, privacy practices, data collection, policies, or any other aspect of a Third-Party Site, even if our sites contain a link to such site. This Privacy Policy does not apply to Third Party Sites, and we encourage you to independently read and understand each Third-Party Site’s own privacy policies. The presence of a link to a Third-Party Site does not necessarily indicate that such Third-Party Site is sponsored by or affiliated with the University of Findlay in any way.

### **Additional Privacy Information**

Cookies: Web browser applications (such as Microsoft Internet Explorer, Google Chrome, Firefox and Apple Safari) typically have features that prevent cookies from being sent or notify you when they are sent. You will need to update your browser’s cookie settings in accordance with your preferences. Your ability to limit cookies is subject to your browser settings and limitations. If you use multiple browsers on your device, you will need to update each browser’s settings separately. We will respond to “Do Not Track” signals, Global Privacy Controls, or other similar mechanisms where required by applicable law.

If you are using a mobile device, you can reset your device settings to limit the use of information collected about you, including your location data. This is typically done by disabling your location settings/permissions. Please contact Apple Support or Google for Android (as applicable) for more information on how to do this on your device.

Analytics: We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”), on certain aspects of the sites. We use the information provided by Google Analytics to improve our Sites and services. For more information regarding how Google collects, uses, and shares your information, please visit <http://www.google.com/policies/privacy/partners/>. Google provides users choices on how their data is collected by Google Analytics by developing an Opt-out Browser Add-on which can be located at: <http://tools.google.com/dlpage/gaoptout?hl=en>. By installing this Add-on, no information is being sent to Google Analytics.

Advertising: The Self-Regulatory Program for Online Behavioral Advertising program provides consumers with the ability to opt-out of having their online behavior recorded and used for advertising purposes by third parties that participate in the program. To opt out of having your online behavior collected for advertising purposes, please visit YourAdChoices at <http://www.aboutads.info/choices/>. Choices you make are both browser and device specific.

Some services also offer their own opt-out choices for the use of cookies for analytic services, interest-based advertising, and other advertising-related services. You are encouraged to learn more about these tools if you wish to limit the use of cookies and other related services. We are not responsible for the accuracy, effectiveness, or compliance with, any third party opt-out tools and does not necessarily endorse these tools or represent that they will be suitable for your needs.

### **Children's Online Privacy Protection Act Compliance**

The sites are directed toward and designed for use by persons who are 13 years or older. As required under the Children's Online Privacy Protection Act (COPPA), we do not solicit or knowingly collect personal information from anyone under 13 years of age. If we discover that we have received personal information from an individual who indicates that they are, or whom we otherwise have reason to believe is, under the age of 13, we will delete such information from our systems. Additionally, a child's parent or legal guardian may request that the child's information be corrected or deleted from our files by contacting us as provided below.

### **Online Privacy Policy Only**

This online privacy policy applies only to information collected through our sites and not to information collected offline.

### **Changes to Our Privacy Policy**

We reserve the right to change this Privacy Policy at any time, in our sole discretion, with or without notice to you. If we decide to change our privacy policy, we will update the Privacy Policy modification date below. By using our sites, you consent to our online privacy policy, and your continued use of the sites and/or provision of your information following any changes/updates to the sites constitutes your acceptance of such changes.

This policy was last modified on August 30, 2023.

### **Contacting Us**

If there are any questions regarding this privacy policy or our data practices, or (where permitted by law) if you would like to submit a data inquiry or request based on a right listed in this Privacy Policy, you may contact us using the information below.

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