

# **Data and Web Privacy**

Northern Kentucky University wants to share with you important information regarding the privacy and confidentiality of your information that may be collected or accessed when you visit university centrally managed websites (e.g. from nku.edu.) and enterprise applications. These centrally managed websites and applications may include services or support provided by third parties (See Use of third party services later in this privacy statement.) We are strongly committed to transparency and to providing an excellent online experience, while taking appropriate steps to protect the privacy of the information you share with us. This privacy policy describes the way in which your personal information may be collected, and how it is secured and used.

Units within the university may collect and use information in different ways. Therefore, visitors to our websites should review the privacy notices for the particular sites they visit. These websites provide additional information regarding the information collected as well as how it is used and secured when different from this privacy statement. Northern Kentucky University is not responsible for the content of other websites or for the privacy practices of websites outside the scope of this notice.

### Children's online privacy protection

If you are under the age of 13, you are not to use this website. If you are a minor between the ages of 13 and 18, you may use the site only in conjunction with your parent, legal guardian or other responsible adult. These age restrictions are necessary to ensure compliance with the Children's Online Privacy Protection Act (COPPA).

# Data Use

The data we collect helps us understand how visitors use our websites and aids in managing and improving services available to our visitors. It also assists us in keeping you informed about news, events and opportunities at Northern Kentucky University, as well as important changes to the websites, new services and offers we think you will find valuable. We use personal information for purposes of administering our business activities, managing your relationship with us, providing customer service, and making products and services available to our customers and prospective customers. With your consent, some university departments may contact you using text messaging (SMS). Details about such situations will be provided at the time of obtaining your consent to this method of communication. We do not sell the information we gather from individual visitors to our websites to any entities, groups or third parties. We may, however, with appropriate safeguards, use third parties to assist us in evaluating how visitors use our websites. This information helps improve our processes and assists us in communicating with those who have visited our websites or have requested information or services from the university.



In order to provide visitors to the website with the requested services and information, some university websites may collect, via request(s) for information and other similar inquiries, such information as: interest, name, email address, phone number, state and/or country, previous education and military status. Additionally, university web servers routinely record the following information each time the sites are visited:

- Internet Protocol (IP) address of the computer being used
- Web pages requested
- Network software access
- Referring Web page
- Browser used
- Date, time and duration of activity
- Type of device (desktop, mobile)

If you are a registered user of a Northern Kentucky University website and have supplied your email address, Northern Kentucky University may occasionally send you an email to tell you about new features, solicit your feedback, or just keep you up to date with what's going on with Northern Kentucky University and the focus of the particular website. We expect to keep this type of email to a minimum. If you send us a request for information or services via a support email or via one of our feedback mechanisms, we reserve the right to publish it in order to help us clarify or respond to your request or to help us support other users. Should we publish your request to help others, we will not publish your email address or name except to other authorized users of university computing services. Northern Kentucky University takes measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of potentially personally identifying and personally-identifying information.

#### Use of third party services

We may share your information with third-party service providers for the purposes of communicating with you regarding our programs and services. Additionally, this information may be used to facilitate improvement of our services, our websites, and our marketing efforts or to help us provide services to our university community (e.g. software/information technology providers).

Some pages within the website may contain content that is provided by external third parties (graphic, logo or script). When you visit one of our pages that contain this third party content, information such as IP address, date, browser and requested page may be transmitted to that third party. Some pages may contain links to external third parties in order to provide services or products to you. NKU is not responsible for the privacy practices of these external third parties. While we request these third parties to protect your information, we do not make any representations about the practices and policies of these third parties. These third parties are not subject to this Privacy Statement.



#### Website Visitors

As noted above, Northern Kentucky University collects identifying information of the sort that web browsers and servers typically make available, such as the IP address, browser type, language preference, referring site, and the date and time of each visitor request. Northern Kentucky University's purpose in collecting this information is to better understand how visitors use our websites (e.g., what browsers are being used to access our websites.) From time to time, Northern Kentucky University may release a non-personally-identifying information aggregate, e.g., by publishing a report on trends in the usage of this website.

# **Aggregated Statistics**

Northern Kentucky University may collect statistics about the behavior of visitors to its websites. Northern Kentucky University may display this information publicly or provide it to others. However, Northern Kentucky University does not disclose personally-identifying information other than as described below. Some of our websites use tools such as Google Analytics (a web analytics service provided by Google, Inc.) to monitor, evaluate and improve the effectiveness and responsiveness of the site. Google Analytics uses cookies to collect usage information of the site. We do not share any specific information about a particular user with Google.

#### Cookies

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Northern Kentucky University uses cookies to help Northern Kentucky University identify and track visitors, their usage of Northern Kentucky University website, and their website access preferences. Northern Kentucky University visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Northern Kentucky University's websites, with the drawback that certain features of Northern Kentucky University's websites may not function properly without the aid of cookies.

#### **Collection of Personally-Identifying Information**

Certain visitors to our websites choose to interact in ways that result in NKU gathering personally-identifying information. The amount and type of information that is gathered depends on the nature of the interaction. In each case, NKU collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with the website. Northern Kentucky University does not disclose personally identifying information other than as described below. Sometimes personally identifiable information has to be collected in order to provide the service (e.g. employment.); however, typically this is not the case. Unless the service requires the information in order to provide the service, website visitors can decline to supply



personally-identifying information, with the caveat that it may prevent them from engaging or make it more difficult to engage in certain website-related activities.

## **Protection of Personally-Identifying Information**

The Northern Kentucky University complies with applicable United States and Kentucky laws and regulations regarding the privacy and protection of personal information. By continuing to use our websites or by providing your personal information, you acknowledge that these laws and regulations protecting your privacy and information may differ from those laws and regulations of the country or jurisdiction from which you are located.

Due to the rapidly evolving nature of information technologies, no transmission of data over the internet can be guaranteed to be completely secure. While we are committed to protecting the privacy of our visitors, we cannot guarantee the security of any information that you transmit to university websites and you do so at your own risk. Once we receive your information, we will use reasonable safeguards consistent with prevailing standards and commensurate with the sensitivity of the data being stored to maintain the security of that information on our systems.

#### **International Privacy**

If you access our websites or use our services from outside the United States or are a citizen of another country, be advised that you are sending information, which may include personally identifiable data, to our servers in the United States. The information you provide may then be transferred within the United States or back out of the United States to other countries or jurisdictions outside of your country of residence (or the country in which you are accessing our websites and/or services.) These countries may not have data protection and privacy laws as protective as those in your country of residence or the country/jurisdiction you are located when accessing or using our websites and/or services. Our collection, storage and use of that data will be governed by this Privacy Policy.

For residents of European Economic Area (EEA), Switzerland and the United Kingdom. The EU General Data Protection Regulation ("GDPR") requires us to provide you with additional information about the processing of personal data. The legal grounds for us processing your personal data typically include at least one of the following:

- You provided your consent
- It is necessary for our contractual relationship
- It is necessary for us to comply with our legal or regulatory obligations
- It is in our legitimate interest (e.g. to provide you with customer service, to fulfill your request).



EU data protection law makes a distinction between organizations that process personal data for their own purposes ("Data Controllers") and organizations that process personal data on behalf of other organizations ("Data Processors"). We may act as either a Data Controller or a Data Processor in respect of your personal data, depending on the circumstances. If you have a question or complaint regarding how we handle your personal data, please use the following email address. <u>Dataprivacy@nku.edu</u>.

### **Disclosure of Personally-Identifying Information**

As noted above, Northern Kentucky University discloses potentially personally-identifying and personally-identifying information only to those in its community of users (such as its employees, contractors and affiliated organizations) that (i) need to know that information in order to process it on Northern Kentucky University's behalf or to provide services available via our websites, and (ii) that have agreed not to disclose it to others without appropriate authorization. Some of these individuals and organizations may be located outside of the country or jurisdiction where you are located; by using Northern Kentucky University's websites, you consent to the transfer of such information to them. Northern Kentucky University will not rent or sell potentially personally-identifying and personally-identifying information. Other than these individuals and organizations, as described above, Northern Kentucky University may disclose potentially personally identifying and personally-identifying information in response to a subpoena, court order or other governmental request, as required by law, or when Northern Kentucky University believes in good faith that disclosure is reasonably necessary to protect the property or rights of Northern Kentucky University, third parties or the public at large.

#### **Privacy Statement Changes**

Northern Kentucky University may change this Privacy Statement from time to time, and in Northern Kentucky University's sole discretion. While most changes are likely to be minor, Northern Kentucky University encourages visitors to frequently check this Privacy Statement page for any changes to its Privacy Statement. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.

If you have questions about what information we collect, this privacy policy or you believe that information has been released without your consent, please contact us via email at: <a href="mailto:dataprivacy@nku.edu">dataprivacy@nku.edu</a>