

DATA AND WEB PRIVACY

POLICY NUMBER: ADM-DATAWEBPRIVACY

POLICY TYPE: ADMINISTRATIVE

RESPONSIBLE OFFICIAL TITLE: VICE PRESIDENT-ADMINISTRATION & FINANCE

RESPONSIBLE OFFICE: INFO TECHNOLOGY (IT) / CHIEF INFORMATION OFFICER (CIO)

EFFECTIVE DATE: 4/12/2019

NEXT REVIEW DATE: PREVIOUS REVIEW PLUS FOUR (4) YEARS – 7/25/2027

SUPERSEDES POLICY: WEB PRIVACY – 5/23/18

BOARD OF REGENTS REPORTING (CHECK ONE):

PRESIDENTIAL RECOMMENDATION (CONSENT AGENDA/VOTING ITEM)

PRESIDENTIAL REPORT (INFORMATION ONLY)

I. PRIVACY STATEMENT

Applicability

Northern Kentucky University (NKU) wants to share 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 <http://nku.edu>.) and enterprise applications. These centrally managed websites and applications may include services or support provided by third parties. (See the “Use of Third-Party Services” section later in this Privacy Statement.) NKU is 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 NKU. This Privacy Statement 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 NKU 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. NKU 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 of 1998 (COPPA).

Data Use

The data collected on Northern Kentucky University (NKU) websites helps provide insights into how visitors use the websites and aids in managing and improving services available to visitors. It also assists NKU in keeping you informed about news, events, and opportunities at NKU, as well as important changes to the websites, new services, and offers you may find valuable. Personal information is used for purposes of administering business activities, managing your relationship with the University, providing customer service, and making products and services available to 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. NKU does not sell the information gathered from individual visitors to NKU websites to any entities, groups, or third parties. NKU may, however, with appropriate

safeguards, use third parties to assist in evaluating how visitors use NKU websites. This information helps improve processes and assists in communicating with those who have visited NKU 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 interests, 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 accessed
- Referring Web page
- Browser used
- Date, time, and duration of activity
- Type of device (desktop, mobile)

If you are a registered user of an NKU website and have supplied your email address, NKU 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 NKU and the focus of the particular website. This type of email is expected to be kept to a minimum. If you send NKU a request for information or services via a support email or via one of NKU's feedback mechanisms, NKU reserves the right to publish it in order to help clarify or respond to your request or to help support other users. Should your request be published to help others, your email address or name will not be published except to other authorized users of NKU computing services. NKU 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

Your information may be shared with third-party service providers for the purposes of communicating with you regarding Northern Kentucky University (NKU) programs and services. Additionally, this information may be used to facilitate improvement of NKU services, NKU websites, and NKU marketing efforts or to help NKU provide services to the University community (e.g., software/information technology providers).

Some pages within NKU websites may contain content that is provided by external third parties (graphic, logo, or script). When you visit a page 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 NKU requests these third parties to protect your information, NKU does 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 (NKU) 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. NKU's purpose in collecting this information is to better understand how visitors use NKU websites (e.g., what browsers are being used

to access NKU websites.) From time to time, NKU may release a non-personally-identifying information aggregate, e.g., by publishing a report on trends in the usage of its websites.

Aggregated Statistics

Northern Kentucky University (NKU) may collect statistics about the behavior of visitors to its websites. NKU may display this information publicly or provide it to others. However, NKU does not disclose personally-identifying information other than as described below. Some NKU 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. NKU does 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 (NKU) uses cookies to help identify and track visitors, their usage of NKU websites, and their website access preferences. NKU visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using NKU's websites, with the drawback that certain features of NKU's websites may not function properly without the aid of cookies.

Collection of Personally-Identifying Information

Certain visitors to Northern Kentucky University (NKU) 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. NKU 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 information is required 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

Northern Kentucky University (NKU) complies with applicable United States and Kentucky laws and regulations regarding the privacy and protection of personal information. By continuing to use NKU 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 NKU is committed to protecting the privacy of website visitors, it cannot guarantee the security of any information that you transmit to University websites, and you do so at your own risk. Once NKU receives your information, reasonable safeguards consistent with prevailing standards and commensurate with the sensitivity of the data being stored will be used to maintain the security of that information on NKU's systems.

International Privacy

If you access Northern Kentucky University (NKU) websites or use NKU 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 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 NKU 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 NKU websites and/or services. NKU's collection, storage, and use of that data will be governed by this Privacy Statement.

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

- You provided your consent
- It is necessary for NKU's contractual relationship
- It is necessary for NKU to comply with its legal or regulatory obligations
- It is in NKU's 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"). NKU may act as either a Data Controller or a Data Processor with respect to your personal data, depending on the circumstances. If you have a question or complaint regarding how NKU handles your personal data, please use the following email address:

dataprivacy@nku.edu .

Disclosure of Personally-Identifying Information

As noted above, Northern Kentucky University (NKU) 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 NKU's behalf or to provide services available via NKU 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 NKU's websites, you consent to the transfer of such information to them. NKU will not rent or sell potentially personally-identifying and personally-identifying information. Other than these individuals and organizations, as described above, NKU 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 NKU believes in good faith that disclosure is reasonably necessary to protect the property or rights of NKU, third parties, or the public at large.

Privacy Statement Changes

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

If you have questions about what information NKU collects, this Privacy Statement, or you believe that information has been released without your consent, please contact NKU via the following email address: dataprivacy@nku.edu .

II. ENTITIES AFFECTED

All students, faculty, staff, and visitors to NKU's websites

III. AUTHORITY

15 U.S.C. §§6501–6506 ([Pub.L. 105–277](#), 112 Stat. [2681-728](#), enacted October 21, 1998.)

[General Data Protection Regulation \(GDPR\)](#)

[Family Educational Rights and Privacy Act \(FERPA\)](#)

[Health Insurance Portability and Accountability Act \(HIPAA\)](#)

[Children's Online Privacy Protection Rule \(COPPA\)](#)

IV. RESPONSIBILITIES

- All employees working with NKU data are responsible for properly protecting that data.
- The Office of Information Technology will work with other business units such as University Counsel, Registrar, and other units to implement this policy and educate faculty/staff/visitors of its impact.

V. COMMITTEE

NKU Data Governance Committee – The purpose of the Data Governance Committee is to recommend and oversee the implementation and management of a formal data governance program that functions across the enterprise. This will entail an agreed-upon common set of policies, standards, methodologies, and processes enacted to safeguard that institutional data is managed in such a way that the interests of the university and individuals are addressed in a fair, legal, and appropriate manner. It will also necessitate plans to communicate and execute these procedures. Education of campus constituents will play an important role in the success of these efforts.

VI. COMMUNICATIONS

Campus community, at large

REVISION HISTORY

REVISION TYPE	MONTH/YEAR APPROVED
Review with minor editing, e.g., links, formatting	July 25, 2023
Revision and name change	April 12, 2019
New policy – “Web Privacy”	May 23, 2018

DATA AND WEB PRIVACY

PRESIDENTIAL APPROVAL

PRESIDENT

Signature

Ashish K. Vaidya

Date 4/12/19

Ashish K. Vaidya

BOARD OF REGENTS APPROVAL

BOARD OF REGENTS (IF FORWARDED BY PRESIDENT)

- This policy was forwarded to the Board of Regents on the **Presidential Report (information only)**.
Date of Board of Regents meeting at which this policy was reported: 5/8/19.
- This policy was forwarded to the Board of Regents as a **Presidential Recommendation (consent agenda/voting item)**.
- The Board of Regents approved this policy on ____/____/____.
(Attach a copy of Board of Regents meeting minutes showing approval of policy.)
- The Board of Regents rejected this policy on ____/____/____.
(Attach a copy of Board of Regents meeting minutes showing rejection of policy.)

EXECUTIVE ASSISTANT TO THE PRESIDENT/SECRETARY TO THE BOARD OF REGENTS

Signature

Wendy Peck

Date

5/10/19

Print Name

Wendy Peck