Harrisburg University of Science and Technology <u>Privacy Notice</u>

Effective Date: 01/16/2024

Harrisburg University of Science and Technology ("HU," "we," "us," or "our") is committed to safeguarding the privacy of individuals who share personal data with us. This Privacy Notice outlines and applies to HU's collection, use, and disclosure of Personal Information provided by students, prospective students, applicants, alumni, donors, and other third parties, as well as visitors to our Website (www.harrisburgu.edu).

This Privacy Notice does not apply to information collected by any third party, including through any application or content (including advertising) that may link to or be accessible from the Website.

Please read this Privacy Notice carefully to understand our policies and practices regarding your Personal Information and how we will treat it. By visiting and using our Website or providing Personal Information to us in any other manner, you understand and agree that HU may collect, use, and disclose Personal Information as described in this Privacy Notice. If you do not agree with our policies and practices, your choice is to not provide Personal Information to us and to not use our Website or other services. Your continued use of our Website and services after we make changes is deemed to be acceptance of those changes, so please check the Privacy Notice periodically for updates.

PERSONAL INFORMATION COLLECTED BY HU

As part of the application process, HU collects Personal Information from or about you, which may include:

- Your name, address, phone number, email address, Social Security Number, driver's license number, passport number, other government identifier, and date of birth. HU may also assign you a unique student identification number.
- Education and employment history, such as the schools you have attended, places you have worked, courses completed, grades, standardized test scores, and other information in your student record.
- Information about your family and social circumstances, academic and extracurricular interests and, with respect to financial aid, financial details.

As part of the application process, HU may also collect Sensitive Personal Information from or about you. For purposes of this Privacy Notice, Sensitive Personal Information is a subset of Personal Information and is defined as race or ethnic origin, political opinions, religious or philosophical beliefs, union membership, data concerning health or sex life and sexual orientation, criminal convictions, and genetic data or biometric data.

HU also collects Personal Information about visitors to our Website and users of our services, including:

- Information by which you may be personally identified, such as name, address, email address, phone number, and date of birth.
- Information about your internet connection, device and browser, and usage details.
- Payment card or other financial information (for example, when you make a payment or donation or complete a transaction).

HOW HU COLLECTS YOUR PERSONAL INFORMATION

HU may collect Personal Information or other data about you by various means, including, for example:

- When you interact with HU before applying or enrolling, for example when you express your interest in studying at HU.
- When you apply for admission to HU, or otherwise provide HU with Personal Information in your application for admission.
- When you complete enrollment or other forms with HU.
- When you respond to surveys that we may ask you to complete for research purposes.
- From records and copies of your correspondence when you communicate with HU by telephone, SMS, email or use HU's Website and other services.
- From third parties, for example from your previous or current school, from testing agencies, or from employers or other individuals who may provide a reference about you.
- Automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies as described herein.

As you navigate through and interact with our Website and services, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data (such as the site you access the Website from), location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your device (including any mobile device), computer, and internet connection, including model, brand, device date, IP address, operating system, mobile network, and browser type.

The information we collect automatically may include Personal Information. It helps us to improve our Website and deliver a better and more personalized service to you by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to the Website.

The technologies we may use for this automatic data collection may include:

- <u>Cookies (or browser cookies)</u>. A cookie is a small file placed in the storage of your computer or device. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you refuse cookies, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- Web beacons. Pages of the Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit HU, for example, to count users who have visited those pages or opened an email and for other related Website statistics (for example, recording the popularity of certain Website content and verifying system and server integrity).

- <u>Advertising and marketing pixels.</u> We use advertising and marketing pixels for remarketing and conversion tracking purposes. The specific pixels and/or tags that we may use include but are not necessarily limited to Google Ads Tag.
- Analytics. We may use analytics tools to optimize our Website based on the traffic we receive and to assist with marketing. Additional information regarding online advertising is available at https://www.networkadvertising.org/understanding-online-advertising/what-are-my-options. To learn more about targeted advertising and the choices available to you, visit https://optout.aboutads.info/.

UNIVERSITY USE OF PERSONAL INFORMATION

We use information that we collect about you or that you provide to us, including any Personal Information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it
- To provide you with recommended products or services.
- To allow you to participate in interactive features on the Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

For students, prospective students, and applicants, HU will use Personal Information that you provide to it and Personal Information it collects about you to administer your application or for your matriculation at HU. In addition, HU may use your Personal Information to analyze and improve its admission process, for outreach efforts, and for other University processes and functions related to your admission and matriculation as a student. HU may also de-identify your Sensitive Personal Information to use for research or statistical purposes. If you are enrolled as a student of HU, HU may use and share your Personal Information internally with other HU offices and units to support your success as a student and to deliver education, advising, residence, athletic, student development, support services (e.g., health and careers), financial assistance, security, and for fundraising. Sensitive Personal Information will only be used when needed, such as use of your health information to provide any necessary accommodations.

ONLINE PAYMENTS

HU may collect credit card or other payment and financial information from you for your application fee, enrollment deposit, tuition, other attendance costs, and donations or purchases. A reputable third-party financial institution handles HU's credit card transactions.

HOW WE SHARE PERSONAL INFORMATION WITH THIRD PARTIES

We may disclose your Personal Information to third parties as follows:

Consent. HU may use and disclose your Personal Information and Sensitive Personal Information to third parties if we have your consent to do so.

Parents and Guardians. In some cases, HU may share your Personal Information with a parent or guardian if necessary to properly complete the admission process or in the event of an emergency.

Service Providers. HU may use third parties to support its operations. These third parties may include, but are not necessarily limited to, the National Student Clearinghouse and Howell Management Services. In such cases, HU may share your Sensitive Personal Information and Personal Information with these third parties who are obligated to safeguard it from unauthorized disclosure.

Employment Necessity. HU may share your Personal Information and Sensitive Personal Information when necessary if you are employed by HU, in accordance with applicable law subject to the imposition of appropriate safeguards to prevent further unauthorized disclosure.

School Counselors and Administrators. HU may use your Personal Information and share it with your school counselors and administrators who have a legitimate educational interest in the data.

Public Information. HU may share your Personal Information or Sensitive Personal Information if you have manifestly made it public.

Archiving. HU may share your Personal Information and Sensitive Personal Information for archiving purposes in the public interest, historical research, and statistical purposes.

Performance of a Contract. HU may share your Personal Information when necessary to administer a contract you have with HU.

University Affiliated Programs. HU may share your Personal Information with third parties that are affiliated with it for contacting you about goods, services, or experiences that may be of interest to you.

Required by Law. HU may share your Personal Information with third parties to the extent we are required to do so by law, court order, or subpoena.

Reorganization. HU may share or disclose your Personal Information and Sensitive Personal Information to a controlling entity or successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Harrisburg University's assets, whether as a going concern or as part of a bankruptcy, liquidation, or similar proceeding, in which Personal Information or Sensitive Personal Information held by HU is among the assets transferred.

Emergency Circumstances. HU may share your Personal Information or Sensitive Personal Information with third parties if, in our sole judgment, such disclosure is necessary to protect the health, safety, or property of any person.

De-Identified and Aggregate Information. HU may collect, use, and disclose Sensitive Personal Information or other Personal Information in de-identified or aggregate form without limitation.

SECURITY

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted.

The safety and security of your Personal Information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

HU'S BASES TO PROCESS YOUR PERSONAL INFORMATION

HU processes Personal Information and Sensitive Personal Information as it is necessary for the performance of the contract under which it provides services to students, applicants, prospective students, and others. Some of HU's processing activities may also be carried out under a legal obligation, where it is necessary to protect the vital interests of HU's students or another party, or for legitimate interests pursued by HU or a third party. HU may also process Personal Information or Sensitive Personal Information based on consent.

RETENTION AND DESTRUCTION OF YOUR INFORMATION

Your Personal Information will be retained consistently with our educational and business purposes and as to comply with applicable laws. The manner of destruction shall be appropriate to preserve and ensure the confidentiality of your Information given the level of sensitivity, value, and criticality to HU.

YOUR RIGHTS

You have the right to request access to, a copy of, rectification, restriction in the use of, or erasure of your Personal Information. These rights differ depending upon the location within the world where Personal Information and Sensitive Personal Information was created or shared, and where you currently reside. You also have the right to withdraw consent to the use of your Sensitive Personal Information, which will not affect the lawfulness of HU's use prior to receipt of your request. Certain Personal Information may be exempt from such requests in some circumstances, which may include if we need to keep processing your Personal Information for HU's legitimate interests or to comply with a legal obligation. HU may request that you provide Personal Information necessary to confirm your identity before responding to your request. You may exercise these rights by contacting HU's Data Manager at https://ithelp.harrisburgu.edu

If your Personal Information and Sensitive Personal Information was created within or transferred from the European Union, Iceland, Lichtenstein, Norway, United Kingdom, or Switzerland, you may also be able to file a complaint with the appropriate supervisory authority in the European Union or those nations.

CHILDREN UNDER THE AGE OF 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any Personal Information to or on the Website. We do not knowingly collect Personal Information from children under 13. If you are under 13, do not use or provide any information on this Website or through any of its features, register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received Personal Information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at Privacy@HarrisburgU.edu.

UPDATES TO THIS NOTICE

We may update or change this Notice at any time. Your continued use of HU's Website and services after any such change indicates your acceptance of such changes.

CONTACT INFORMATION

If you have any questions about this Privacy Notice or our practices as described herein, please contact us at

Privacy@HarrisburgU.edu, or

326 Market Street, Harrisburg, PA 17101