



## **William Jessup University Information Security Privacy Notice**

William Jessup University is committed to safeguarding privacy in the collection, processing and sharing of personal data. William Jessup University collects and processes personal data ("Information") from individuals only as necessary in the exercise of the University's legitimate interests, functions and responsibilities as a private, non-profit institution of higher education. This document describes the personal data we collect, process, and share; the measures we take to protect the privacy of that personal data; and the rights you have in connection with those activities. When information is submitted to the University, or you use the University's websites and other services, you consent to the collection, use, and disclosure of that information as described in this privacy notice.

### **INFORMATION WE COLLECT AND PROCESS**

Information collected from students or student applicants is used to register or enroll persons in the University, provide and administer housing to students, manage a student account, provide academic advising, develop and deliver education programs, track academic progress, analyze and improve education programs, recruitment, regulatory reporting, auditing, maintenance of accreditation, and other related University processes and functions.

The University also uses Information to conduct general demographic and statistical research to improve University programs, to identify appropriate support services or activities, provide reasonable accommodations, enforce University policies or comply with applicable laws. Finally, Information may be shared by WJU with third parties who have entered into contracts with the University to perform functions on behalf of the University, subject to the obligation of confidentiality and safeguarding from unauthorized disclosure.

We do not share nonpublic personal information with non-affiliates.

WJU stores the personal data it collects and processes that is essential for its operations for an indefinite period; and engages in the routine review of the stored data to determine the non-essential data that may be permanently deleted. Personal data WJU collects and processes includes but is not limited to:

- Personal information: Your name, username, areas or topics of interest, and student ID photograph.
- Demographic information: Gender, age/date of birth, nationality, job title, company information, education, work experience and other professional information.
- Contact information: Postal address, telephone and/or mobile number, and email address.
- Consent records: Records of any consents you may have given, together with means of consent and any related information (e.g., the subject matter of the consent).
- Payment details: Payment records, billing address, payment amount, and payment date.
- Enrollment details: Where you interact with us in your capacity as a student, your student identification number, courses taken and grades, academic standing, class rank, enrollment level.

- Non-personally identifiable information: information indicating which pages were visited, the order in which they were visited, and which hyperlinks were employed may be collected. Collecting such information involves the logging of IP addresses, operating systems, and browser software. Although such information is not personally identifiable, WJU can determine from the IP address a visitor's Internet Service Provider and the geographic location of the user's point of connectivity. This helps in administering the site, diagnosing server problems, and determining the effectiveness of promotional activities.

## **LAWFUL GROUNDS UPON WHICH THE UNIVERSITY MAY PROCESS PERSONAL DATA**

The University may process your personal data on any of the following lawful grounds:

- Contractual Necessity: when processing is necessary for the performance of a contractual obligation
- Legal Obligation: when necessary for the fulfillment of our legal obligations
- Vital Interests: when necessary to protect your vital interests or the vital interests of another individual
- Public Interests: when necessary to protect the public interest or to perform a task on behalf of the public interest or in the exercise of any institutional official authority
- Legitimate Institutional Interests: when necessary for any legitimate interest of the institution except where your interests or fundamental rights override those legitimate interests (especially if you are a minor)
- Consent: when you provide explicit consent to the processing of your personal data for one or more specific purposes
- Website activity: The University's use of cookies and other data collection can be found in the University's Website [Privacy Policy](#).

## **THIRD PARTY USE OF SENSITIVE INFORMATION**

We may disclose your Sensitive Information and other Information as follows:

- Consent: We may disclose Information if we have your consent to do so.
- Emergency Circumstances: We may share your Information when necessary to protect your interests and you are physically incapable of providing consent.
- Employment Necessity: We may share your Information when necessary for administering employment or social security benefits in accordance with applicable law or any applicable collective bargaining agreement, subject to the imposition of appropriate safeguards to prevent further unauthorized disclosure.
- Public Information: We may share your Information if you have manifestly made it public.
- Archiving: We may share your Information for archival purposes in the public interest, and for historical research and statistical purposes.
- Performance of a Contract: We may share your Information when necessary to administer a contract you have with the University.
- Legal Obligation: We may share your Information when the disclosure is required or permitted by international, federal, and state laws and regulations.
- Service Providers: We use third parties who have entered into a contract with the University to support the administration of University operations and policies. In such cases, we share your Information with such third parties subject to the imposition of appropriate safeguards to prevent further unauthorized disclosure.
- University-Affiliated Programs: We may share your Information with parties that are affiliated with the University for the purpose of contacting you about goods, services, charitable giving or experiences that may be of interest to you.

- De-Identified and Aggregate Information: We may use and disclose Information in de-identified or aggregate form without limitation.

## **RETENTION AND DESTRUCTION OF YOUR INFORMATION**

Your information will be retained by the University in accordance with applicable state and federal laws, and the applicable retention periods in the University's records management policies. Unless otherwise prohibited by law, your Information will be destroyed upon your request. The manner of destruction shall be appropriate to preserve and ensure the confidentiality of your Information.

## **INFORMATION SECURITY**

William Jessup University implements safeguards to:

- ensure the security and confidentiality of data, information (electronic and print), and resources;
- protect against anticipated threats or hazards to the security or integrity of such information; and
- protect against unauthorized access to or use of data, information, and resources.

The William Jessup **Information Security Plan** describes precautions we take to prevent loss, misuse or alteration of your personal data.

## **TRANSFERS OF COLLECTED INFORMATION**

We are located in the United States. By submitting your personal data via any Jessup web site or various servers and software systems, you transfer your personal data to us.

William Jessup University and 3rd party data processors it contracts operate secure data networks protected by industry standard firewall and password protection systems. Only authorized individuals have access to the information you provide. All security and privacy policies are periodically reviewed and enhanced as necessary.

## **YOU HAVE RIGHTS ASSOCIATED WITH YOUR INFORMATION**

You have the right to request access to, a copy of, rectification, restriction in the use of, or erasure of your information in accordance with all applicable laws. The erasure of your information shall be subject to applicable state and federal laws, and the applicable retention periods in the University's records management policies. If you have provided consent to the use of your information, you have the right to withdraw consent without affecting the lawfulness of the University's use of the information prior to receipt of your request.

Information created in the European Union may be transferred out of the European Union to the University. If you feel the University has not complied with applicable foreign laws regulating such information, you have the right to file a complaint with the appropriate supervisory authority.

To lodge a complaint or to exercise any of your rights with respect to your personal data processed by WJU or if you have any questions about this GDPR Data Privacy Notice or our treatment of your personal data, please contact the Information Services Director at [Heldpdesk@Jessup.edu](mailto:Heldpdesk@Jessup.edu).

## **UPDATES TO THIS POLICY**

We review these privacy practices from time to time and these practices are, therefore, subject to change. We may update or change this policy at any time and users are asked to periodically review this policy to ensure continuing familiarity with the most current notice. The notice is emailed to students at least annually and the most current notice will be available on the [consumer information page](#) at Jessup.edu.