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**Responsible University Office:** Enrollment Management and Marketing

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# **UNK Online Privacy Policy**

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#### Scope

The University of Nebraska at Kearney values the privacy of all visitors to UNK websites and applications. This describes the privacy policy on the collection, protection, and disclosure of information resulting from the use of university websites and apps. The policy includes information that is collected automatically and information provided by users voluntarily.

## **Policy Statement**

UNK does not redistribute or sell personal information collected through its websites, mobile applications, or third-party vendors or applications.

UNK complies with all applicable state and federal privacy statutes, including the Higher Education Opportunity Act (HEOA), Family Educational Rights and Privacy Act (FERPA), the Health Insurance Portability and Accountability Act (HIPAA), the Nebraska Public Records Law, the University of Nebraska Board of Regents Policy for Responsible Use of University Computers and Information Systems, and UNK Data Security Guidelines. UNK also adheres to ethical standards established by the National Association for Colleges Admission Counseling and the American Association of Collegiate Registrars and Admissions Officers. As a requirement for accreditation under Higher Learning Commission, UNK is required to comply with the HLC Student Consumer Protection Policy.

This policy statement is intended to clarify the relationship between the University of Nebraska at Kearney and the data of students, faculty and staff, friends of the university and all visitors to and users of its websites and apps. All entities of the University of Nebraska at Kearney are required to comply with this privacy policy.

## **Reason for Policy**

This policy is intended to protect the privacy of visitors to UNK web pages, users of UNK mobile applications and other associated websites and apps, and to inform UNK web page visitors that while Analytics (Google) and other data-recovery, reporting processes and tools are used by UNK Web developers, this information is used only to improve the user's experience at unk.edu.

### Procedures

Visitors to UNK web pages, apps and embedded online tools are leaving anonymous traffic data using cookies, which are small files related to the website or app being viewed. Types of information in cookies might include general information about the user's visit, sometimes aggregated with data from other visits, that helps the web developers understand how users are interacting with the website or app, or helps the app or site function properly. It may include data such as the Internet address that the user was connected to during the site visit, the web page from which the visitor entered the site, which of the UNK resources were visited, in what order, and for how long.

UNK web pages use <u>Google Analytics</u>. Other data-collection and analysis tools may be used, provided they do not collect any form of <u>Personally Identifiable Information</u>.

In addition, all Web servers throughout the Internet collect basic details on connections in their server logs, including requesting IP addresses, resources requested, time of the request and whether the request was successful. UNK web developers aggregate information from the above sources to help improve UNK websites and apps by understanding how they are used and to maintain technical quality of systems and services.

Websites and apps require user authentication (user name and password or other access credential) to enter specific private information or data. Once logged in, visitors may be asked to provide information such as name, email address, address, birthday, student ID number, items of interest, or other information to help UNK provide them information. While authenticated, site visitors (students, prospective students, staff/faculty) may also

access and interact with private information, such as grades, enrollment, class activity or other privileged information. Such information remains under the user's control and may only be shared with others by the user's direct action. UNK sites may provide tools to enable users to share information with others, but in no circumstance will any data be shared outside of the university and/or its contracted providers without the user's direct action and knowledge.

UNK may use voluntarily provided information, including identity information, to tailor the content of web pages and other communications to site visitors' or users' needs, interests or role(s).

University of Nebraska at Kearney websites and apps may include links to other websites and/or apps, or may display content from external services or providers. Except as part of formal business relationships between UNK and service vendors, a link from a UNK site does not imply endorsement of a destination site. While UNK strives to be a good steward of third-party embedded content, these third parties may have their own privacy policies. UNK is not responsible for the privacy practices of these external third parties. For users' own protection, they should review the privacy policy of any site linked to from our website or any site to which they provide personal information.

UNK may use text messaging (SMS) to communicate with individuals. Normal messaging rates apply and the frequency of messages may vary. Mobile Carriers are not liable for delayed or undelivered messages.

No mobile information will be shared with third parties/affiliates for marketing/ promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

Individuals may opt-out of text messaging at any time by replying to any message with STOP or by contacting UNK at <u>UNKCRMServices@Nebraska.UNK.edu</u>. This will end the communications from that phone number. Individuals may continue to receive service-related and other non-marketing text messages from other phone numbers managed by UNK, and they may opt out of those in a similar fashion.

Users who "opt in" or subscribe to marketing messaging from UNK will have the ability to stop or "opt out" of future communications by clicking "unsubscribe" at the bottom of their UNK marketing email. Questions about marketing subscriptions can be directed to UNKCRMServices@Nebraska.UNK.edu.

## Definitions

Personally Identifiable Information: Personal information means either of the following:

1.Board of Regents definition: A Nebraska resident's first name or first initial and last name in combination with any one or more of the following data elements that relate to the resident if either the name or the data elements are not encrypted, redacted, or otherwise altered by any method or technology in such a manner that the name or data elements are unreadable:

- 1. Social security number;
- 2. Motor vehicle operator's license number or state identification card number;
- 3. Account number or credit or debit card number, in combination with any required security code, access code, or password that would permit access to a resident's financial account;
- 4. Unique electronic identification number or routing code, in combination with any required security code, access code, or password; or
- 5. Unique biometric data, such as a fingerprint, voice print, or retina or iris image, or other unique physical representation; or

2. A user name or email address, in combination with a password or security question and answer, that would permit access to an online account.

Personal information does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records

<u>Cookie</u>: A small piece of text sent to a browser by a website visited. It helps the website to remember information about the user's visit, like preferred language and other settings. That can make the user's next visit easier and the site more useful.

<u>Data:</u> In the context of online privacy, data means information about a site visitor that can include login name, IP address, user preferences and settings, time and length of site visit and actions taken on the site. This includes information entered by the site visitor such as search terms and request-for-information forms.

## Related information

Higher Education Opportunity Act

Family Educational Rights and Privacy Act

Health Insurance Portability and Accountability Act

Nebraska Public Records Law

University of Nebraska Board of Regents Policy for Responsible Use of University Computers and Information Systems

UNK IT and data security and use policies

National Association for College Admission Counseling Code of Ethics

American Association of Collegiate Registrars and Admissions Officers Ethics and Practices

HLC Student Consumer Protection Policy (effective Sept. 1, 2019)

FTC consumer information on online privacy

## History

New policy published September 2024.