

<b>SUBJECT:</b>	<b>Effective Date:</b>	<b>Policy Number:</b>
GENERAL PRIVACY POLICY	New	

**POLICY STATEMENT:**

Florida Atlantic University is committed to safeguarding the privacy of personal data. The University does not collect personal information about an individual unless the individual chooses to make such information available to the University.

**A. Collection and Use of Personal Data**

*Legitimate Interests.* The University collects and processes information and sensitive information from individuals, including without limitation Data Subjects, only as necessary in the exercise of the University's legitimate interests, functions, and responsibilities as a public research higher education institution.

*Research and Statistics.* The University collects and processes information and sensitive information from individuals who are research subjects in the exercise of scientific, for historical research, or for statistical purposes, including without limitation general demographic and statistical research to improve University programs.

*Employees.* The University collects and processes information from employees, including individuals who are applicants for employment, to respond to their application and enter into or administer a contract or other employment relationship with the University. Upon receiving an applicant's consent, the University collects information concerning judicial measures and data to consider the applicant for employment and uses information, and data concerning an applicant's employment, to administer payroll and benefits programs and to manage the applicant's employment record.

accessed the University's website. This information does not result in the identification of the individual's personal e-mail address or other personal information. In addition, the University gathers information regarding the volume and timing of access to its website by collecting information on the date, time and website pages accessed by visitors to the website. The University does this so that it can improve the content of our website. Only aggregate information is collected, and individual personal information is not identified.

*Online Payments.* The University may collect credit card information for application fees, enrollment deposits or to process other University payments. A reputable third-party financial institution handles University credit card transactions. Whenever credit card information is transmitted through the University's website, the numbers and letters are scrambled using encryption technology to protect the information from being stolen or intercepted. For security purposes, the University does not allow individuals to store their credit card number from session to session.

*Marketing.* The University collects information and sensitive information provided by individuals in the marketing context in order to respond to their requests, offer services or programs, communicate with constituents about University programs, and personalize content of communications. The University maintains information about its constituents to analyze demographic and marketing information, to solicit potential constituents or donors, to recruit potential students, faculty, and staff, to research, analyze, and identify individuals interested in developing relationships or with existing relationships with the University, such as donors, friends, and alumni, to generate reports based on areas of interest, to review and evaluate University programs, as well as to manage prospective, current, or former participants of University programs. The University sends information about upcoming events, opportunities for giving back, and news regarding the various programs offered at the University by mail, phone, and email. The University will not send you these communications unless you opt-in to receive this information. This information will be used for alumni activities, including sending University publications, promotion of alumni benefits services, events, and programs. You have a right at any time to stop us from contacting you for marketing purposes at any time without detriment. If you no longer wish to be contacted for any of the above marketing purposes, please refer to Marketing Communication Opt-Out Request Form to opt out.

## **B. Sharing of Personal Data**

*Consent.* The University may share sensitive information and other information when it has a person's consent.

*Parents and Guardians.* The University may share a student's information with a parent or guardian, consistent with University policy and regulations, and state and federal law.

*Emergency Circumstances.* The University may share information with third parties if, in the University's sole judgment, such disclosure is necessary to protect the health, safety, welfare, or property of any person. The University may share sensitive information and other information when necessary to protect a person's interests and safety or fulfilling health and wellness obligations established by law. Sensitive information regarding judicial measures will be processed only for purposes relating to a health or safety emergency and complying with any applicable provision of law.

*Employment Necessity.* The University may share sensitive 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.

*Charitable Organizations.* The University may share information with the University Foundation and other University-affiliated not-for-profit organizations in connection with charitable giving, subject to the imposition of appropriate safeguards to prevent further unauthorized disclosure.

*Public Records.* The University may share sensitive information and other information if a person has manifestly made it public or if otherwise required by State or Fed

*De-Identified and Aggregate Information.* The University may use and disclose information in de

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