

# **GLBA Privacy Notice**

# **December 2, 2022**

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Effective date: October 31, 2022

## **GLBA Template - Privacy Notice**



## 1 Privacy Policy

Talladega College respects your privacy and collects no personally identifiable information about you unless you affirmatively choose to make such information available to us. Talladega College does not actively share personal information about website visitors or access to applications that are hosted by Talladega College or its authorized third-party service providers.

Personal information provided by visitors, such as e-mail addresses or information submitted via online forms, is used to assist individual visitors to access Talladega College services as necessary. This assistance may involve redirecting an inquiry or comment to another Talladega College site or service provider.

#### 2 Definitions

The following terms and definitions will be used throughout this policy:

#### Service

Service means a Talladega College website, the Talladega College mobile applications operated by Talladega College, and access to third-party service provider applications that provide information services to the institution

#### Personal Data

Personal Data is information about an individual user to uniquely identify the person. Personally

Identifiable Information (PII) or Nonpublic Personal Information (NPI) is included in this definition

- Personal Data/Information includes information that can be used to reasonably identify you, such as name, email address, physical address, photos, as well as other sensitive personal data.
- **Sensitive Information** includes special categories of Personal Information such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health information, sex life, or sexual orientation where applicable law provides enhanced protections.

#### • Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself, for example, the duration of a page visit.

#### Cookies

Cookies are small files stored on your device that are used by Internet web servers in order to manage the web application's operational state.

#### 3 Information Collection

We collect several different types of information for various purposes to provide and improve our service to you. As defined above, the types of data that will be collected from users and visitors of Talladega College may be collected on an as-needed basis. The following types of data may be collected from the user of Talladega College systems:

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#### **Personal Data**

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personal identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials, and other information that may be of interest to you. You may opt-out of receiving any, or all, of these communications from us by following the unsubscribe link or the instructions provided in any email we send.

#### **Usage Data**

We may also collect information that your browser sends whenever you visit our Service. This usage data may include information such as your computer or device operating system, Internet Protocol address (IP Address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

## **Tracking & Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service that may link to personally identifiable and/or location information.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

#### 4 Use of Data

Talladega College uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues

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 To provide you with news, special offers and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information

# 5 Lawful Basis for Collecting and Processing Personal Information

Talladega College is an institution of higher education whose central purpose is education, research, outreach, and public service. Talladega College's collection of information on a lawful basis may include admissions, registration, delivery of classroom, online, grades, communications, employment, and records retention.

The legal basis for Talladega College's collection and processing of personal data includes:

- **Legitimate Interests** pursued by Talladega College or third parties in providing education, employment, research and development, and public service;
- **Performance of a Contractual Obligation** to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract;
- Compliance with a legal obligation to which Talladega College is subject; and/or
- **Consent** is given by the data subject for Talladega College to use their personal data for one or more specific purposes.

#### 6 Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Talladega College will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

#### 7 Disclosure of Data

## **Disclosure for Law Enforcement**

Under certain circumstances, Talladega College may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).

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#### **Legal Requirements**

Talladega College may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Talladega College
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public To protect against legal liability

# 8 Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

#### 9 Service Providers

We may employ third-party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services, or assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

# **10 Analytics**

We may use third-party Service Providers to monitor and analyze the use of our Service.

#### <Example Google Analytics>

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>

# 11 Payments

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing. We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa,

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MasterCard, American Express, and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with are:

#### • <Payment Processor>

Their Privacy Policy can be viewed at <Payment Processor URL>

#### 12 Links to Other Sites

Our Service may contain links to other sites that are not operated by or managed by contracted service providers. If you access a third-party link from one of our services, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

# 13 Children's Privacy

Our Service does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

# 14 Changes to This Privacy Policy

We may update our privacy policies from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.