

# **University of Massachusetts Global**

# **Privacy Notice**

April 2021

# University of Massachusetts Global's Privacy Policy

University of Massachusetts Global ("UMass Global"), a nonprofit affiliate of the University of Massachusetts, is committed to protecting your privacy. This Statement of Privacy applies to the UMass Global website and governs data collection and usage. By using the UMass Global website, you consent to the data practices described in this statement.

Click on one of the links below to go directly to the relevant section:

Collection of Your Personal Information	2
Use of Your Personal Information	
Personalizing Your Online Experience	4
Information Gathered About You Or Your Devices	5
Device Information	5
Google Analytics	5
Email Subscriptions	5
Rights Regarding Your Information	5
Children's information	6
Personal Information of Persons outside the United States	6
Security of Your Personal Information	6
Consent	6

#### **Collection of Your Personal Information**

UMass Global collects personally identifiable information, such as your e-mail address, name, home and/or work address and/or telephone number. UMass Global also collects anonymous demographic information, which is not unique to you, such as your ZIP code, age, gender, preferences, interests, and favorites.

Our Partners may use cookies, web beacons, and/or other monitoring technologies to compile anonymous statistics about our website visitors. Non-Personally Identifiable Information ("NPII") data is collected by our Partners and is used by our Partners for the purpose of online Retargeting reporting web traffic, statistics, advertisement 'click-throughs,' and/or other activities on our website. NPII data collected by our Partners includes information such as the Prospect's IP address, date and time of visit, domain

type, randomly generated browser IDs (e.g. Google Analytics ClientID), and their activity on our Advertisers' and Partners' websites. This information can be traced back to a specific individual. In addition, users on our website may choose to identify themselves via web forms for activities such as Requesting Information or Online Applications.

Please keep in mind that if you directly disclose Personally Identifiable Information ("PII") or personally sensitive data through UMass Global's public message boards, social media sites or forums, this information may be collected and used by others. Such communication is not monitored by UMass Global and the individuals involved are responsible for protecting their PII.

UMass Global encourages you to review the privacy statements of websites you choose to link to from UMass Global so that you can understand how those websites collect, use and share your information. UMass Global is not responsible for the privacy statements or other content on websites other than those managed by UMass Global or the use of your information by such outside websites.

#### **Use of Your Personal Information**

UMass Global collects and uses your personal information to deliver services related to higher education. UMass Global may also use your PII to inform you about programs, classes, scholarships, events and other activities related to UMass Global. UMass Global may also contact you via surveys to conduct research about your opinion of current services and programs or of potential new services and programs.

UMass Global does not sell, rent or lease its lists to third parties. UMass Global however does share its lists for retargeting purposes, whereby these third parties may contact you for products and services not affiliated with UMass Global. UMass Global may share data with trusted partners to help us perform statistical analysis, or send you personalized communications. Such third parties are prohibited from using your personal information except to provide these services to UMass Global, and they are required to maintain the confidentiality of your information.

UMass Global does not use or disclose sensitive personal information, such as race, religion, or political affiliations, without your explicit consent. UMass Global students' and applicants' rights with respect to their education are explicitly protected under the Federal Family Educational Rights and Privacy Act (FERPA).

UMass Global may keep track of the websites and pages you visit within UMass Global, in order to determine what UMass Global services are the most popular. This data is used to deliver customized content and marketing within UMass Global to students and prospective students whose behavior indicates that they are interested in a particular subject area.

UMass Global websites will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on UMass Global; (b) protect and defend the rights or property of UMass Global (including enforcing this

agreement); and, (c) act under exigent circumstances to protect the personal safety of users of UMass Global, or the public.

#### Personalizing Your Online Experience

The UMass Global website may use "cookies" or browser local storage to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies are not used to run programs or deliver viruses to your computer.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize UMass Global pages, or register with UMass Global sites or services, a cookie helps UMass Global to recall your specific information on subsequent visits. This simplifies the process of recording your personal information. When you return to the same UMass Global website page, the information you previously provided can be retrieved, so you can easily use the features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the UMass Global services or websites you visit.

You may disable cookies through your individual browser options. Visit <u>http://www.aboutcookies.org/</u> for information on how to do this.

UMass Global also uses your IP address to administer our Sites by identifying (1) which parts of a UMass Global Sites are most heavily used, (2) where our users come from (i.e., a referring site or a search engine, etc.), and (3) which portion of our audience comes from within or outside the UMass Global network. (4) whether there is any malicious activity associated with a particular IP address, so that we can block, and report for abuse, any IP address that is associated with malicious activity. We link IP addresses to personally identifiable information in order to identify spammers and other malicious actors. This information may be passed on to third parties (such as, but not limited to: Information Security partners, and law enforcement) if the IP in question was involved in malicious activity.

The email address you provide may be used to send you information, respond to inquiries, and/or other requests or questions. We may use your personal information in order to process student, financial aid or job applications, to process student or employee registrations, to respond to inquiries, for marketing and development purposes and for other programs, events, services and benefits that we provide to our students, employees and other persons.

# Information Gathered About You Or Your Devices

We collect information when you access one of the Sites and when you subscribe to our email services.

# **Device Information**

We may collect information about the computer, mobile device or other device you use to access the Sites such as IP address, geolocation information, unique device identifiers, browser type, browser language or other information of this nature. We use this information in an aggregate fashion to track access to UMass Global Sites.

# **Google Analytics**

One or more of our UMass Global Sites may also use a third-party service, Google Analytics, to track website statistics. Google Analytics collects information anonymously and reports website trends without identifying individual visitors. We use the information collected to understand how our visitors are using the website and make improvements for a better online experience. Google Analytics uses first-party cookies to track visitor interactions and collects the Internet Protocol (IP) address of website visitors in order to provide us a sense of where our visitors come from, but Google Analytics does not report visitors' actual IP Address information to us. To see the full Google Analytics privacy policy and learn more about their privacy practices, please see <u>Google Privacy</u> Policy and <u>Google Analytics: Safeguarding Your Data</u>.

#### **Email Subscriptions**

If you sign up for one of UMass Global's email subscription services, we will use the information you submitted to provide you services. If you unsubscribe from our email, we will honor your unsubscribe request within 10 business days.

#### **Rights Regarding Your Information**

If you provide UMass Global with personal information you thereby give your express consent for UMass Global to contact you by phone, email, mail and/or text message. You have the following rights with respect to that information:

- To review the user information that you have supplied to us
- To request that we correct any errors, outdated information, or omissions in user information that you have supplied to us
- To request that your user information not be used to contact you
- To request that your user information be removed from any solicitation list that we use and
- To opt out of being solicited by this website or third parties

If you request that your user information be deleted from our records, there may be a brief delay in our processing that request. We will retain the records of your request to

delete your information. If you request that your information be deleted, we reserve the right to terminate and/or limit your access to the UMass Global website.

To exercise any of these rights, please contact <u>donotcall@UMassGlobal.edu</u>.

UMass Global is entitled to refuse to comply with your request for one of the following reasons:

- to comply with legal obligations or exercise of official authority
- to exercise or defend a legal claim. When complying with a valid request for the removal of data, we will take all reasonably practical steps to delete the relevant data

# Children's information

UMass Global does not knowingly collect information from children and does not target or direct our sites to children. The meaning of "children" is subject to the laws and regulations in the jurisdiction in which you are located.

# Personal Information of Persons outside the United States

UMass Global Sites are published in the United States and are subject to the laws of the United States. If you are located in a country outside the United States and voluntarily submit personal information to us, your information will be used as provided in this Privacy Statement and will be transferred to, and/or be stored in, the United States.

If you are located in the European Economic Area (EEA) and you voluntarily submit personal information to us, your information will be used as provided in this Privacy Statement and will be transferred to, and/or stored in, the United States.

# Security of Your Personal Information

No method of safeguarding information is 100% secure. UMass Global uses a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure. UMass Global secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personal information (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

# Consent

By using this site, you signify your consent to UMass Global's online privacy policy. If you do not agree to this policy, please do not use this site. We reserve the right, at our discretion, to update, change, modify, add, or remove portions of this policy from time to time.

This Privacy Policy has been developed with the recognition that Internet technologies are rapidly evolving and that underlying standard business models are still not well established. Accordingly, this Privacy & Security Statement is subject to change. Any such changes will be posted on this page and the date will be updated below.

#### Last Updated: April 6, 2021