

	<b>PRIVACY POLICY</b>
<b>Policy number</b>	CD-001-2021
<b>Effective Date</b>	01/01/2021
<b>Revised Date(s)</b>	09/03/2021
<b>Purpose</b>	To describe how we treat personal information that we collect.
<b>Additional authority</b>	California Consumer Privacy Act (CCPA)
<b>Applicability</b>	All
<b>Office of Origin</b>	Compliance
<b>Review Frequency</b>	Annually
<b>Next Review Date</b>	01/01/2022
<b>Executive Sponsor</b>	Chief Compliance Officer
<b>Related policy(ies)</b>	FERPA and Copyright Infringement Policies
<b>Related procedure(s)</b>	N/A
<b>Related Publication(s)</b>	N/A

### Impact Analysis

Department	Impacted?	Representative
Academics	Y	Provost and Chief Academic Officer
Admissions	Y	Director of Admissions
Business Office	Y	Controller
Career Services	Y	Director of Career Services
Compliance	Y	Chief Compliance Officer
Executive	Y	Chief Executive Officer and President
Facilities	Y	VP of IT and Campus Services
Finance & Accounting	Y	Chief Financial Officer
Financial Aid	Y	Director of FA
Human Resources	Y	Director of HR
Information Technology	Y	VP of IT and Campus Services
Institutional Effectiveness	Y	VP of Institutional Research and QA
Marketing	Y	VP of Enrollment & Strategic Development
Registrar	Y	Registrar
Student Services	Y	Dean of Students

## Policy Statement

The California Consumer Privacy Act of 2018 (CCPA) gives consumers more control over the personal information that businesses collect about them. This law secures new privacy rights for California consumers including:

- The right to know about the personal information a business collects about them and how it is used and shared;
- The right to delete personal information collected from them (with some exceptions);
- The right to opt-out of the sale of their personal information; and
- The right to non-discrimination for exercising their CCPA rights.

This Privacy Policy ("Policy") describes how the University of Silicon Valley ("USV") treats the Personal Information we collect. Personal Information may be collected on our websites, via software applications, mobile applications, and information collected when accessing our Wi-Fi services (collectively, the "Sites"). This Policy applies to website visitors, current and potential students, alumni, candidates, employees, and any other user of services offered through our Sites, including any websites, software applications or mobile applications operated by or on our behalf. This policy applies to both online and offline collection, storage, processing and transfer of Personal Information.

When this policy mentions "USV", "we", "our" or "us", it refers to the University of Silicon Valley which is the institution responsible for your information under this Privacy Policy. Certain affiliated sites, mobile applications, services, or partners may be subject to additional privacy policies or privacy disclosures relating to the relevant services provided. In the event of any direct conflict between any additional policies and this policy, the additional privacy policies related to each site will control.

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND HOW WE HANDLE YOUR INFORMATION. BY INTERACTING WITH USV, YOU ACKNOWLEDGE YOU HAVE READ AND UNDERSTAND THIS PRIVACY POLICY AND THAT WE WILL COLLECT, USE AND SHARE YOUR INFORMATION AS SET FORTH BELOW.

## Policy Details

### **PERSONAL INFORMATION WE COLLECT**

- A. Prospective Students
  - 1) Contact Information
  - 2) Areas of Interest
  - 3) Web-based Data
- B. Applicants for Enrollment
  - 1) Academic History
  - 2) Demographic Information
  - 3) Financial Information
  - 4) Employment History
- C. Admitted Students and Alumni
  - 1) Academic History
  - 2) Background Check
  - 3) Biometric Data
  - 4) Media
  - 5) Sensitive Health / Medical Information

D. Prospective Job Applicants

- 1) Contact Information
- 2) Employment History
- 3) Demographic Data
- 4) Background Check
- 5) Sensitive Health / Medical Information
- 6) Academic History
- 7) Web-based Data

E. Employees

- 1) Biometric Data
- 2) Media
- 3) Financial Information
- 4) Sensitive Health / Medical Information

**HOW THE COLLECTED INFORMATION IS USED**

Web analytical Information is automatically collected when someone visits our Sites. USV also collects and uses Personal Information that is provided to us voluntarily online or offline when someone contacts us, responds to an advertisement, requests information, applies to the University as a potential student, employee or contractor, visits our campus, receives a USV-issued photo ID, registers for classes; applies for financial aid, orders educational or other products and services, interacts on social networks, or uses our career services, learning assessments or other interactive tools. While the exact nature of the Personal Information may vary depending on the type of response or service requested, throughout an affiliation with USV, we may collect information to the extent it is necessary and applicable for the intended purposes.

The information we collect through inquiries, interactions, and the application processes is necessary to provide relevant information, to evaluate candidates for admission, employment or contracting, and to provide general services related to such inquiries.

Personal information collected through the financial aid application process is used to determine financial aid opportunities and eligibility.

Enrolled students and alumni may provide additional information to USV to provide any services related to an academic institution and to coordinate with partners, campus housing facilities, transportation providers, potential employers, campus events, service activities, commencement ceremonies, and all other events an employee, contractor, student or alumnus may attend or participate in.

Photographs, biometric data, and background check information may be collected as necessary for security purposes and to comply with relevant employment requirements.

USV may combine all of the information we collect or receive for the stated purposes and may aggregate or de-identify the information for analytical, statistical, academic, legal, and business purposes.

We will keep the information only for as long as it is necessary to fulfill the purposes described in this policy unless a longer retention is required or permitted by law.

We may delete or de-identify the information sooner if we receive a verifiable deletion request, subject to exemptions under applicable law. The retention period that applies to the information may vary depending on the services used and all interaction with USV.

To be removed from any future communication, email or otherwise, please email [Compliance@usv.edu](mailto:Compliance@usv.edu).

**WHEN AND WITH WHOM WE SHARE THE INFORMATION**

We may share collected information with:

A. Partners

We may share the collected information with third party partners. Depending on the partnership, we may share certain information including contact information (with direction), identification and

demographic information, transactional information, research and feedback, and social media information.

**B. Social Networks**

We may share the collected information with social media platforms, for example, if someone clicks on a Facebook “like” button, the “like” may appear on their Facebook account. To control this sharing of information, please review and adjust privacy settings for the relevant social network. Depending on the privacy settings and actions on such network, we may share contact information, identification and demographic information, user-generated content, device information and identifiers, connection and usage data, and social media information.

**C. Service Providers**

We engage vendors to perform services for academic and business purposes on our behalf and share information with them to enable them to provide us with such services, including career services, research and analytics, hosting, transaction and payment processing, marketing, fraud prevention, identity management, acquisition and other services. Service providers may use such information for their operational purposes in order to provide their services to us.

**D. Federal, State, Academic, Law Enforcement and Other Authorities**

We share any of the categories of information we collect, as appropriate, with these third parties to comply with reporting or disclosure requirements; protect and enforce the legal rights, privacy, and safety of USV, our students and employees; protect against possible fraud or other illegal activity, and to otherwise comply with appropriate administrative and legal processes.

**E. Sale or Transfer of All or Part of Our Business or Assets**

In the event that USV is involved in a merger, acquisition, transfer of control, bankruptcy, reorganization or sale of assets, or diligence associated with such matters, we may sell or transfer the information described in this Privacy Policy as part of that transaction.

**RIGHT TO REQUEST DISCLOSURE OR DELETION**

California consumers have the right to request the details regarding the collection, use, disclosure, and sale of personal information. They may also request the disclosure of specific pieces of information or the deletion of personal information collected (with some exceptions).

**A. Request Categories of Information**

You may request that we tell you the categories of personal information we collect, the categories of sources from which personal information is collected, the business or commercial purpose for collecting the personal information, the categories of third parties with which the business shares personal information, or the categories of personal information that were disclosed for a business purpose.

**B. Request Specific Information**

You may request that we tell you about some of the specific personal information that we hold about you.

**C. Request Deletion**

You may request that we delete information that we hold about you. Certain collected personal information may not be deleted if required by law or relevant academic authorities. Additionally, we may not be able to provide you with certain services upon a deletion.

**D. Request to change or correct any incorrect data we have about you.**

**E. Express any concern you have about our use of your data.**

Requests for disclosures or deletion may be made by email to: [compliance@usv.edu](mailto:compliance@usv.edu). Prior to providing the requested information, we will take reasonable steps to verify the requestor’s identity through confidential information we have on file. We will respond within the time period prescribed by applicable law.

**RIGHT TO OPT-OUT OF THE SALE OF PERSONAL INFORMATION**

USV does not sell Personal Information collected.

## **RIGHT TO NON-DISCRIMINATION**

USV will not discriminate against anyone for exercising their CCPA rights.

## **HOW WE PROTECT INFORMATION**

We use industry-standard security and take commercially reasonable measures to secure and store collected Personal Information to protect against the loss, misuse, and alteration of the Information under our control. Unfortunately, no data transmission can be guaranteed to be completely secure. As a result, although we will utilize such measures, we do not guarantee against the loss, misuse, or alteration of Information under our control, and any information provided to us at the person's own risk. Persons should always be cautious in the handling and disclosure of their Personal Information and should avoid sending Personal Information through insecure online, email or other methods.

## **MONITORING COMMUNICATION**

We may monitor and retain incoming and outgoing communications for quality assurance purposes, to assist with training our representatives, and to retain records of such interactions.

## **INTERNATIONAL TRANSFERS**

In the event USV offers programs where students and staff travel internationally to work and study with international partners, we may transfer relevant Personal Information to partners outside of the United States to provide appropriate services. Data privacy laws vary from country to country and they may not be equivalent to, or as protective as, the laws of the United States. We take industry-standard measures to ensure that reasonable safeguards are in place to the help ensure an appropriate level of protection for personal information. By providing us with information for these purposes, persons acknowledge any such transfer, storage, or use.

Unfortunately, no data transmission can be guaranteed to be completely secure. As a result, although we will utilize such measures, we do not guarantee against the loss, misuse, or alteration of Information under our control, and information to us at the risk of those providing the information.

## **YOUR CHOICES**

### **A. Cookies and Similar Technologies**

As part of offering and providing customizable and personalized services, The University of Silicon Valley may use cookies to store information about you. A cookie is a small amount of data that is sent to your browser from our web server and stored on your computer's hard drive.

Generally, we may use cookies to:

- 1) Remind us of who you are and to access your information (stored on our computers) in order to deliver to you a better and more personalized service. For example, a cookie is set when you register or "Sign In" and is modified when you "Sign Out" of our services.
- 2) Automate certain areas of the University of Silicon Valley websites or online forms.
- 3) Estimate our audience size. Each browser accessing the University of Silicon Valley website is given a unique cookie which is then used to determine the extent of repeat usage, usage by a registered user versus by an unregistered user, and to help target advertisements based on user interests and behavior.
- 4) Measure certain traffic patterns, which areas of the University of Silicon Valley website you have visited, and your visiting patterns in the aggregate. We use this research to understand how our users' habits are similar or different from one another so that we can make each new experience on the University of Silicon Valley website a better one. We may use this information to better personalize the content, and promotions that you and other users will see on our sites.

University of Silicon Valley also collects IP Addresses, browser information and other computer information to report aggregate information to our marketing department. Persons also have choices with respect to cookies. Modifying browser preferences provides the choice to accept all cookies, to be notified when a cookie is set, or to reject all cookies. Please refer to the browser's help page for further information about the options for controlling or monitoring cookies.

**B. Mobile App and Connected Devices**

Depending on the device used, advertising and location preferences may be managed through the device settings. Many operating systems provide their own instructions on how to prevent the delivery of tailored in-application advertisements. We do not control how the applicable platform operator allows you to manage personalized in-application advertisements. Users should review the device manufacturer's support materials and/or the device settings for the respective operating systems for more detail on how to manage such preferences. Users can stop all collection of information by a mobile app by uninstalling the relevant mobile application.

**C. Third-Party Online Services**

USV's Sites may contain links to third party services. These other sites, even if cobranded with USV may collect information and use this information in accordance with their own privacy policies and terms of service. We do not control those third parties' policies or practices. In some circumstances, we may link to some websites on behalf of others and those entities may place or permit the placement of cookies and other tracking technology. We are not responsible for these tracking practices.

**UPDATES TO OUR PRIVACY POLICY**

We reserve the right to amend this Privacy Policy at any time to reflect changes to our practices or the law. We will publish and date Privacy Policy updates on our website.

The date at the top of this Privacy Policy tells you when it was last updated. If we make material changes to the way we collect or use your information, you will be provided with appropriate notice, including, but not limited to, by posting the updated Privacy Policy on this website, and providing notice in accordance with legal requirements. Any changes to this Privacy Policy will become effective when the revised Privacy Policy is posted. By continuing to use USV services following any changes to this Privacy Policy, you acknowledge you have read and understand the updated Privacy Policy, and you understand that we will collect, use, and share information as stated therein.

**CONTACT US**

For any questions in relation to this Privacy Policy please contact us at: [Compliance@usv.edu](mailto:Compliance@usv.edu) or University of Silicon Valley, ATTN: Compliance Department, 191 Baypointe Parkway, San Jose, CA 95134.