



Online Privacy Statement

I. Introduction

This Online Privacy Policy describes the type of information Albany State University and its Service Providers collect from visitors to our sites, what we do with that information, and how visitors can update and control the use of information provided on this site. This policy does not necessarily describe information collection policies on other sites, such as separate sites operated by our Service Providers that we do not control. Many of the resources linked from this website are not maintained by Albany State University. Albany State University cannot monitor all linked resources, only those pages which fall directly within the University's world-wide web structure. Albany State University is in no way responsible for the privacy practices or the content of these linked resources and the statements, views, and opinions expressed therein are neither endorsed by nor do they necessarily reflect the opinion of the University.

This policy may be changed from time to time and without further notice. Continued use of University sites after any such changes constitutes acceptance of the new terms. If a visitor does not agree to abide by these new terms or any future terms, he or she should not use the sites. These sites are not directed to children under 13 years of age, and children under 13 years of age shall not use these sites to submit any personal information about themselves.

In the event that any information contained within this policy conflicts with any Board of Regents (BOR) policy, the BOR policy controls.

II. Purpose

This policy discloses the practices with respect to the gathering and dissemination of information the University obtains from users of the websites of Albany State University.

This policy applies to those sites for which Albany State University is the operator, although software, hosting and other functions may be provided by third parties ("Service Providers").

III. Policy

Information We Gather

Albany State University may collect certain information that is automatically generated when a user visits a site, including, but not limited to, the Internet Protocol (IP) address of the originating Internet Service Provider, and information provided by "cookies" stored on your hard drive. We may also collect aggregate information about the use of the sites, including, but not limited to, which pages are most frequently visited, how many visitors we receive daily, and how long visitors stay on each page. A visitor may be prompted or required to provide certain personal information in order to access

various features and information on the sites. Such information may include, among other things, name, address, and phone number. If a visitor does not want to provide such information, he or she may choose not to access those features of the sites. Any personal information provided through the sites will be protected in accordance with the provisions of this Policy.

Use of Information

Albany State University uses the information it collects to maintain and improve the websites and in connection with marketing activities. Some information may be shared with third party vendors that the University contracts with to complete business transactions, provide services or conduct online marketing of the University. These websites or third-party vendors may also use cookies for tracking purposes.

Albany State University may disclose and publish aggregate information on an aggregate basis to any party through any means, but such aggregate information will not disclose any personal information. Any information collected through these sites may also be used in aggregate by system administrators in the administration of the sites.

The University strives to maintain the privacy and accuracy of personal information. We do not actively share personal information gathered from the sites. However, some information collected from the sites may be subject to the Georgia Open Records Act. This means that, while we do not actively share information, in some cases we may be required by law to release information gathered from the sites. Georgia public universities also comply with the Family Educational Rights and Privacy Act (FERPA), which prohibits the release of education records without student permission. For more details on FERPA, currently enrolled students at Albany State should refer to the University catalog.

Security and Accuracy of Confidential Information

Albany State cannot guarantee the personal information obtained from a visitor is accurate. In the event that there is an error in collected information, the University will attempt to correct the information upon written request.

While the University strives to protect against the loss, misuse and alteration of the information under our control through security measures we consider reasonable and appropriate, it cannot guarantee or warrant the security of the information, and if a visitor chooses to use the sites, he or she does so at his or her own risk.

Information disclosed by visitors to the sites in certain forums intended for public use (e.g. information, including personal information that is provided to others on bulletin boards, through blogs or in chat rooms, or social media that may be available on the sites) can be collected and used by other visitors to the sites.

Changes to this Policy

The University reserves the right to make changes to this Policy and/or the Online Privacy Statement as needed and in accordance with University and Board of Regents Policy. The current version will be made available on the University website(s). If you have questions about this Policy or you believe

your personal information has been released without your consent, please contact the Office of the Vice President for Information Technology.

European Union General Data Protection Regulation (EU GDPR) Privacy Notice

Lawful Basis for Collecting and Processing of Personal Data.

Albany State University is an institute of higher education involved in education, research, and community development. In order for Albany State University to educate its students both in class and on-line, engage in world-class research, and provide community services, it is essential, necessary, and Albany State University has lawful bases to collect, process, use, and maintain data of its students, employees, applicants, research subjects, and others involved in its educational, research, and community programs. The lawful bases include, without limitation, admission, registration, delivery of classroom, on-line, and study abroad education, grades, communications, employment, applied research, development, program analysis for improvements, and records retention. Examples of data that Albany State University may need to collect in connection with the lawful bases are: name, email address, IP address, physical address or other location identifier, photos, as well as some sensitive personal data obtained with prior consent.

Most of Albany State University's collection and processing of personal data will fall under the following categories:

- 1) Processing is necessary for the purposes of the legitimate interests pursued by Albany State University or third parties in providing education, employment, research and development, community programs.
- 2) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. This lawful basis pertains primarily but not exclusively to research contracts.
- 3) Processing is necessary for compliance with a legal obligation to which Albany State University is subject.
- 4) The data subject has given consent to the processing of his or her personal data for one or more specific purposes. This lawful basis pertains primarily but not exclusively to the protection of research subjects, providing medical and mental health services.

There will be some instances where the collection and processing of personal data will be pursuant to other lawful bases.

Types of Personal Data collected and why

Albany State University collects a variety of personal and sensitive data to meet one of its lawful bases, as referenced above. Most often the data is used for academic admissions, enrollment, educational programs, job hiring, provision of medical services, participation in research, development, and community outreach. Data typically includes name, address, transcripts, work history, information for payroll, research subject information, medical and health information (for student health services or travel), and donations. If you have specific questions regarding the collection and use of your personal data, please contact the Office of Legal Affairs at LegalAffairs@asurams.edu.

If a data subject refuses to provide personal data that is required by Albany State University in connection with one of Albany State University's lawful bases to collect such personal data, such refusal may make it impossible for Albany State University to provide education, employment, research or other requested services.

Where Albany State University gets Personal and Sensitive Personal Data

Albany State University receives personal and sensitive personal data from multiple sources. Most often, Albany State University gets this data directly from the data subject or under the direction of the data subject who has provided it to a third party (for example, application for admission to Albany State University through use of the Common App).

Individual Rights of the Data Subject Under the EU GDPR

Individual data subjects covered by Albany State University's EU General Data Protection Regulation Compliance Policy will be afforded the following rights:

- 1) Information about the controller collecting the data
- 2) The data protection officer contact information
- 3) The purposes and legal basis/legitimate interests of the data collection/processing
- 4) Recipients of the personal data
- 5) If Albany State University intends to transfer personal data to another country or international organization
- 6) The period the personal data will be stored
- 7) The existence of the right to access, rectify incorrect data or erase personal data, restrict or object to processing, and the right to data portability
- 8) The existence of the right to withdraw consent at any time
- 9) The right to lodge a complaint with a supervisory authority (established in the EU)
- 10) Why the personal data are required, and possible consequences of the failure to provide the data
- 11) The existence of automated decision-making, including profiling
- 12) If the collected data are going to be further processed for a purpose other than that for which it was collected

Note: Exercising of these rights is a guarantee to be afforded a process and not the guarantee of an outcome.

Any data subject who wishes to exercise any of the above-mentioned rights may do so by filing such request with the Office of Legal Affairs at LegalAffairs@asurams.edu.

Cookies

Cookies are files that many websites transfer to users' web browsers to enable the site to deliver personalized services or to provide persistent authentication. The information contained in a cookie typically includes information collected automatically by the web server and/or information provided voluntarily by the user. Our website uses persistent cookies in conjunction with a third-party technology partner to analyze search engine usage and web traffic patterns. This information is used in the aggregate to monitor and enhance our web pages. It is not used to track the usage patterns of individual users.

Security of Personal Data subject to the EU GDPR

Albany State University will not share your information with third parties except:

- 1) As necessary to meet one of its lawful purposes, including but not limited to:
 - a. its legitimate interest,
 - b. contract compliance,
 - c. pursuant to consent provided by you,
 - d. as required by law;
- 2) As necessary to protect Albany State University's interests;
- 3) With service providers acting on our behalf who have agreed to protect the confidentiality of the data.

Data Retention

Albany State University keeps the data it collects for the time periods specified in the University System of Georgia Records Retention Schedules:

https://www.usg.edu/records_management/schedules/.

For examples of Student Records Retention Schedules, see:

https://www.usg.edu/records_management/schedules/934

For examples of Human Resources (Employment) Records Retention Schedules, see:

https://www.usg.edu/records_management/schedules/930

IV. Applicability

ASU Campus Community

ASU Faculty and Staff

ASU Students

V. Accountability

Albany State University Division of Information Technology Services

Albany State University Office of Legal Affairs

VI. Contacts

Albany State University Vice President and Chief Information Officer

Albany State University Chief Legal Affairs Officer

VII. References

For more information regarding the EU GDPR, please review Albany State University's EU General Data Protection Regulation Compliance Policy.

Please email questions or concerns to: LegalAffairs@asurams.edu

Last Update

Jan 2022