GoGlobal.wheaton.edu Website Privacy Policy Version 1, May 24, 2018

This Privacy Policy offers an explanation of why we collect particular information and how we will protect your personal privacy when you visit the goglobal.wheaton.edu website. The following discloses our information gathering and dissemination practices for this College website. In order to fully understand your rights we encourage you to read this Privacy Policy in full. The College reserves the right to modify this Privacy Policy at any time, and we encourage you to frequently check this page for any changes to this Privacy Policy.

Scope

This Privacy Policy applies to Wheaton College's <u>goglobal.wheaton.edu</u> website and pertains solely to information collected by this website. This policy specifically covers:

- What personally identifiable information is collected from you through goglobal wheaton edu, how the information may be used and with whom it may be shared;
- What choices are available to you regarding the use of your information;
- The security procedures Wheaton College has in place to protect the misuse of your information; and
- How you can correct any inaccuracies in your information.

GoGlobal.wheaton.edu is web-based application and registration software system primarily used for requirements related to participation in College-sponsored off-campus programs. The software is hosted by Terra Dotta and their Privacy Policy may supersede this Privacy Policy. Review their policy at http://www.terradotta.com/privacy-policy.html.

Any policy specific to another division, department, or unit of the College will supplement and may also supersede this Privacy Policy.

Information Collection, Use, and Sharing

Personal information is any information that personally identifies you or from which you could be identified. This may include information related to you that can be identified, directly or indirectly, by reference to an identifier such as an identification number, profile information linked from the College's student information system (SIS) and supplemented by the user, or application and pre-departure registration responses as provided by or derived from information provided by the user, such as in the case of recommendations.

The College collects, exports, and uses personal information as described in this Privacy Policy and will not process personally identifiable information in any way that is incompatible or inconsistent with the purpose for which such information was collected.

College Use of Information

Your personal information will only be used for academic or philanthropic purposes directly connected to or approved by the College, which may include but not be limited to, information related to College programs and services. We may share your personal information with the College and our vendors for the purpose of performing College business.

Wheaton College will use your personal information only to respond to you regarding the reason you contacted us and to provide any related services or fulfill any related requests. Unless you ask us not to, we may contact you via email in the future to provide information about special campus events, available study programs, or changes to this privacy policy.

Third Party Use of Information

Unless otherwise required by law, we will not share your personal information with any other individual or organization, except in the following circumstances:

- Consent. We may disclose your information to third parties if we have your consent to do so.
- **Service Providers.** We enter into contracts with third parties to support our operations. In such cases, we may share your information with such third parties who are obligated to safeguard the information in the same manner as the College.
- **Required by Law.** We will share your information with third parties to the extent we are required to do so by law, court order, or subpoena.
- **De-Identified and Aggregate Information.** We use and disclose information about our applicants in de-identified or aggregate form without limitation.

Links to Other Sites

Our site contains links to other websites maintained or controlled by third parties. Please note that when you click on one of these links, you are entering another website for which the College has no responsibility. We encourage you to read the privacy notices on all third party sites as their policies may be different than ours.

We may also provide social media features that enable you to share information with your social networks and to interact with the College on various social media sites. Please note that when you share your information on these social media sites, you are entering a third party site for which the College has no responsibility. In addition, your use of these features may result in the collection or sharing of information about you, depending on the feature, by the third party social media site. We encourage you to review the privacy policies, notices and settings on the social media sites with which you interact to make sure you understand the information that may be collected, used, and shared by those sites.

Cookies

Terra Dotta uses cookies and other technologies on their Public Site and as part of the Services for user session management and to provide a better user experience, including customization of content display. A cookie is text data that a website transfers to the individual's browser from a web server that is stored on the individual's computer hard drive. Cookies cannot be used by themselves to identify individuals.

Most browsers automatically accept cookies by default, but you can usually refuse cookies or selectively accept cookies by adjusting the preferences in your browser (please refer to your browser's help function to learn more about cookie controls). If you turn off cookies there may be some features of our site that will not be available to you, and some web pages may not display properly.

Recording Log-in Data

When you log in to the College's website, we store a unique random number as a session cookie. As a user loads each subsequent page, that number is used to verify and track that you are logged in by the unique random number assigned. This session cookie is stored until you log out or the browser window is closed.

When you log into the College's website using your assigned credentials, you will be provided the option to store your credentials for your next session.

Internet Protocol (IP) Address

Terra Dotta may also record information about how individuals access their Services. This information is typically not personally identifiable and may include internet protocol (IP) addresses (or the DNS name associated with it) of the individual's computer, the web site from which the individual linked to our Services, and the browser software the individual is using to access our Services. This information is used in the aggregate to administer computer systems and to make improvements to our Services.

Security

The College implements appropriate technical and organizational security measures to protect your information when you transmit it to us that ensure a level of security appropriate to the risks presented by the processing and the nature of the data to be protected, and when we store it on our information technology systems. While we strive to protect your information, we cannot ensure or warrant the security of such information.

Wherever the College collects sensitive personal data (such as contact information, health information, etc.), that information is encrypted and transmitted to us in a secure way. You can verify that your information is being transmitted securely by looking for a closed lock icon at the bottom of your web browser, or looking for "https" at the beginning of the web address.

In addition to using encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (e.g., billing, program registration, or student care) are granted access to personally identifiable information.

Your Rights, Access, and Control over Data Collection

Subject to all applicable laws, you have the right to request access to, a copy of, rectification, restriction in the use of, or erasure of your information. The erasure of your information shall be subject to any applicable retention periods in its record retention policies. You also have the right to withdraw consent to the use of your information, without affecting the lawfulness of the College's use of the information prior to receipt of your request. You may exercise these rights by contacting us at gps@wheaton.edu:

- Review your personal information that Wheaton College has on record in goglobal.wheaton.edu, if any;
- Change/correct any of your personal information we have collected;
- Instruct us to delete any of your personal information we have collected; or
- Express any concern you have about our collection, use or maintenance of your personal information.

Information collected in the European Union will be transferred out of the European Union to the College. If you feel the University has not complied with applicable foreign laws regulating such information, you have the right to file a complaint with the appropriate supervisory authority in the European Union.

Retention and Destruction of Your Information

Your information will be retained by the College in accordance with any applicable retention periods in its record retention policies and subject to all applicable laws. Your information will be destroyed upon your request or after the expiration of the applicable retention period, whichever is later. The manner of destruction shall be appropriate to preserve and ensure the confidentiality of your information given the level of sensitivity, value and criticality to the College.

Updates

Our Privacy Policy may change from time to time, and all policy updates will be posted on this page. Your continued use of this site after any such change indicates your acceptance of such changes. Please revisit this page to stay aware of any changes.

If you have any questions or concerns regarding this Privacy Policy or would like additional information regarding Wheaton's goglobal.wheaton.edu website and information security practices, please contact us at gps@wheaton.edu.