

## ONLINE PRIVACY POLICY

When you visit the University of St. Thomas website and mobile applications (which we refer to as “sites”), we may collect some information about you and your visit. This policy governs and explains our collection and use of this information.

Some of our schools, colleges, departments and other units maintain separate privacy policies or notices that apply to information collected from visits to our sites that they manage. If so, those sites will link to or refer to the separate privacy policy or notice that applies.

This policy does not apply to information collected from or about current or former employees, contractors and volunteers of St. Thomas as part of their employment or working relationship with St. Thomas.

### Information We Collect

Depending on the specific site and your choices, we may collect personal and non-personal information about you and your visits to our sites.

- **Personal information** directly identifies you or can be tied back to you and readily reveal your identity. Examples include your name, street address, email address, telephone number, Social Security number, credit card number, driver’s license or other government-issued identification number, the Internet Protocol (IP) address from which you access our sites (if it is not associated with a publicly available computer terminal), and demographic information linked to other personal information.
- Some laws consider certain personal information to be particularly sensitive. **Sensitive personal information** includes your race, ethnicity, membership in trade unions, political and religious beliefs, genetic data, and data relating to your health, sexual orientation and sexual relationships.
- **Non-personal information** does not identify you and cannot readily be tied back to you. Examples include the date and time of your visits to our sites, the amount of time spent on our sites, site content you view, the browser and operating system you use to access our sites, the Internet domain and address of sites from which you access our sites, your general geographic location when visiting our sites, and aggregated demographic information that is not linked to any personal information.

### How We Collect and Use Information

**Non-personal information.** Like most organizations with an Internet presence, we collect non-personal information through automated processes called “cookies,” unless you take steps to visit sites anonymously or opt out of cookies. (For more information about cookies, see “Our Use of Cookies” below.) We use non-personal information to:

- Help remember your preferences when you visit our sites;
- Provide you with more relevant content, including some customized marketing and advertising;
- Provide us with aggregated information for statistical purposes and analyzing how visitors use our sites;

- Evaluate, develop and offer new and enhanced programs, services, resources and information;
- Improve visitor experiences on our sites, including site navigation, content and performance; and
- Authenticate log-in information, detect and prevent fraud and other criminal activity involving our sites, and maintain the security of our sites.

**Personal information.** Most personal information we collect, and all sensitive personal information we collect, is information you voluntarily provide to us by typing the information on our sites, allowing the information to automatically populate online forms, uploading the information to our sites, or electronically granting your consent for us to obtain the information from third parties.

We use personal information to:

- Evaluate your eligibility for the services, programs, resources, positions, benefits and other opportunities we offer or you request;
- Offer and provide you with services, programs, resources, benefits and information and transact business with you;
- Improve your experience when participating in our programs, services and benefits;
- Conduct research;
- Accept and process gifts and grants to St. Thomas; and
- Comply with applicable law.

Once you provide us with your personal information, we may be able to link back to your identity when you click on customized links in emails we send you or type in a customized web address in connection with promoted events, activities and programs and for other marketing and engagement purposes. This helps us to assess the effectiveness of our communications, marketing and engagement efforts.

Some personal information that is not sensitive personal information, such as your IP address and certain demographic information not linked to other personal information, is collected automatically through cookies. St. Thomas does not use personal information collected automatically by us through cookies to link back to your identity. However, if you permit cookies to remember your preferences and automatically fill in forms requesting personal information from you, the personal information automatically filled in may be used by us to link back to your identity.

### **How We Share and Process Information We Collect**

- **Information subject to a contractual relationship.** Information collected in connection with a contractual relationship is shared and processed consistent with the purposes and terms of the contractual relationship.
- **Non-personal information not subject to a contractual relationship.** Non-personal information collected outside of a contractual relationship may be shared and processed internally at St. Thomas or shared with and processed by third parties, without further notice to you. Non-personal information typically is aggregated before it is shared, and it is never attributable to you.

- **Personal information not subject to a contractual relationship.** Sensitive personal information collected outside of a contractual relationship generally may be shared and processed only with your express consent for the specific purposes for which it was collected. Other personal information collected outside of a contractual relationship may be shared and processed internally at St. Thomas or shared with and processed by third parties we engage to provide services to us or on our behalf (such as vendors who help us with marketing, recruiting, data processing, data analysis and web hosting), for the purposes identified above under “How We Collect and Use Information.” We require these third parties to keep your personal information secure and do not allow them to use or share your personal information for any purpose other than providing services to us or on our behalf.

We also may share personal information, including sensitive personal information, with third parties when required by law, court order or legal process; to enforce our policies; or to pursue legal remedies or defend against legal claims. Additionally, we may share your personal information with third parties as you request, and as otherwise permitted by this and other St. Thomas policies and applicable laws and regulations.

- **We never will sell your personal information to third parties for their use in direct marketing, advertising or promotion of their products or services.**

### **How We Protect Personal Information**

We use reasonable physical, technical and administrative safeguards to protect personal information we collect against misuse. These safeguards include, for example, the encryption of data during collection. While we strive to protect your personal information, it is not possible to guarantee the complete security of your personal information during and after your visits to our sites.

### **How Long We Keep Personal Information**

We generally keep personal information only while it is needed for the purpose for which it was collected, unless we have a legal obligation or other legitimate institutional reason to maintain the information for a longer period.

### **International Transfer of Personal Information**

Personal information provided to us by persons outside the United States may be transferred to the United States. By providing us with personal information, you acknowledge that your information will be transferred to the United States and processed on servers in the United States.

Personal information provided to us by persons within or outside the United States may be transferred to countries other than the United States depending on the specific information, programs and services involved. We take reasonable steps to protect the privacy of your personal information under all data protection laws applicable to us. However, the laws that apply to us may be different than those that apply in your home country or the countries to which data is transferred.

### **Our Use of Cookies**

A cookie is a file created and stored on your computer hard drive or other device when you visit sites. Cookies are designed to hold information about you and the sites you visit, and they can automatically transfer that information to other sites or third parties. The information is used to:

- Tailor sites and advertising to better match your browsing history and preferences;

- Reduce the need for you to re-type information repeatedly when you visit sites or transact business online; and
- Provide site owners with statistical and analytical information to help them understand how their sites are being used and whether those uses are meeting objectives and expectations.

Some cookies are persistent, meaning they may remain in existence after you close your browser session or application. Other cookies are erased when you close your browser session or application.

Our sites use cookies to collect information about site usage and to ensure a better experience for you, including by providing you with marketing and advertising content we judge to be particularly relevant to you based on information collected through our cookies. This information is commonly known as “analytics.” We have an agreement with Google to provide analytics services to us.

By using the full features of our sites, you are consenting to the creation and storage of cookies on your computer or device and the use of these cookies by St. Thomas and others working with us. You can choose to decline or delete cookies by adjusting your browser settings and opting out of the related services. If you choose to decline or delete cookies, you can still use our sites, but some features may not function as expected. To opt out of the creation, storage and use of cookies by St. Thomas and others working with us, visit the [Google Analytics opt out page](#).

### **Social Media Plug-ins**

Some of our sites contain embedded social media sharing buttons. Social media platforms use cookies or other tracking technologies. We do not control, and cannot access, any information collected through these buttons. The social media platforms are responsible for how they use your information. For specific privacy controls, see the privacy and cookies policies maintained by the applicable social media platforms. Policies for commonly used platforms such as Facebook, Instagram, LinkedIn, Pinterest, Twitter, YouTube are available on their websites.

### **Targeted Advertising**

Some of our sites are designed to display advertisements that are specifically targeted to you based on your browsing history. These advertisements may be selected based on your visits to our sites or other sites containing St. Thomas content or marketing.

Additional information about targeted advertising is available at [Opt Out](#) and [Your Online Choices](#). You can opt out of targeted advertisements as described on these sites. Opting out will not eliminate advertisements altogether; instead, you will see ads that are not specifically targeted to you based on your browsing history. (Deleting cookies may delete your advertising preferences, which may require you to opt out of targeted advertisements again.)

### **External Links**

Our sites may contain links to other sites that are not managed or controlled by St. Thomas. We are not responsible for the contents or privacy practices of those other sites.

### **Choices You Can Make About Your Information**

You can make the following choices to limit the information we collect and use:

- You can choose not to allow cookies from our sites and can decline or delete cookies, as described above under “Our Use of Cookies.” This may affect the functionality of our sites and may require you to re-type information you commonly enter in online forms.

- You can opt out of targeted advertising but not all advertising, as described above under “Targeted Advertising.”
- You may choose not to submit personal information through our sites, and you may choose not to grant consent for us to obtain or use your personal information for any purposes or particular purposes. This may limit the information, services, programs, positions, benefits and other opportunities available to you and the business you can transact with us.
- You can choose not to receive emails from us by “unsubscribing” using the instructions in any email you receive from us. This will not stop us from sending emails about your account or your transactions with us.

### Information for Individuals in the European Union

If you are an individual located in the European Union, you have additional rights regarding your personal information, as described below.

- **Right of access.** You may request details of your personal information that we hold. We will confirm whether we are processing your personal information. We also will disclose supplementary information, including the categories of personal information we hold, the sources from which it originated, the purpose and legal basis for our processing of the information, the expected retention period for the information, and the safeguards that apply to transfers of the information to countries outside the European Union, subject to legal limits.
- **Right of correction.** We will promptly comply with your request to edit and update incorrect personal information.
- **Right to be forgotten.** At your request, we will delete your personal information promptly if: we no longer have a need to retain it; you withdraw the consent that allowed us to process it; you object to its processing and there are no legitimate grounds to override your objection; it was processed illegally; or it must be deleted for us to comply with our legal obligations. We will inform any third parties we might have shared your personal information with of your deletion request.

We will decline your request for deletion if processing of your personal information is necessary: to comply with our legal obligations; in connection with our pursuit of legal action; to detect and monitor fraud; or for the performance of a task in the public interest.

- **Right to restrict processing of your personal information.** At your request, we will limit the processing of your personal information that we hold if: you dispute its accuracy; it was processed unlawfully and you request limitations on processing, rather than deletion of the information; we no longer need to process it, but you require it in connection with a legal claim; or you object to the processing pending verification as to whether we have a legitimate ground that overrides your objection.
- **Right to notice related to correction, deletion, and limitation on processing.** To the extent practicable, we will notify you of any correction, deletion or limitation on the processing of your personal information.
- **Right to data portability.** At your request, we will provide your personal information to you, free of charge, in a structured, commonly used and machine-readable format, if: you

provided us with personal information; its processing is based on your consent or required for contractual performance; or the processing is carried out by automated means.

- **Right to object.** You may object to our processing of your personal information to fulfill what we judge to be a legitimate institutional interest.
- **Right not to be subject to decisions based solely on automated processing.** You will not be subject to legal or similarly significant decisions that are based solely on the automated processing of your personal information, unless you have given us your explicit consent or the decision is necessary for our fulfillment of contractual obligations.
- **Right to withdraw consent.** You have the right, at any time, to withdraw any consent you previously gave us regarding your personal information. Withdrawing your consent will not affect the lawfulness of our collection, use and sharing of your personal information before your consent is withdrawn. If you withdraw your consent, we may still use your personal information that has been fully anonymized and does not personally identify you.
- **Right to complain to a supervisory authority.** If you are not satisfied with our response, you have the right to complain to or seek advice from a supervisory authority. You also have the right to bring a claim against us in any court of competent jurisdiction.

### **Notification of Changes to this Policy**

We may modify this policy at any time. The modified policy will be posted on this site. Visiting any of our sites after the modified policy is posted constitutes your acceptance of the modified policy.

### **Contact Information**

If you have questions about how we collect and use information or wish to make any requests regarding your rights under this policy, please contact [privacy@stthomas.edu](mailto:privacy@stthomas.edu). We will respond to your written request without unreasonable delay and in accordance with any deadlines imposed by law. If you are in the European Union, unless we notify you upon receipt of your request, we will not charge you any fee in connection with the exercise of your rights.

For other policies related to technology, please visit the [Information Securities policy page](#) for more information.

### **Effective Date**

This policy is effective as of December 2, 2018.