



ROLLINS COLLEGE POLICY

Title: Privacy and General Data Protection Regulation Statements	Type	Key Institutional
No: KI 1021		Approval Date: 10-30-2019
Responsible Office: Information Technology		Reviewed By: College Policy Committee, 10-15-2019; President’s Cabinet,10-30-2019 Approved By: President, 10-30-2019
Next Review: 2020-2021		Revision No:

I. Purpose/Introduction/Rationale

To meet state, federal, and international regulations and vendor requirements, the Rollins Office of Information Technology has developed this privacy and general data protection regulation statements for public posting on the College’s website (www.rollins.edu). The statements are provided in Appendices A and B.

II. Definitions

FERPA – Family Educational Rights and Privacy Act (20 U.S.C. § 1232g; 34 CFR Part 99), a Federal law applying to all schools that receive funds under an applicable program of the U.S. Department of Education, that protects the privacy of student education records.

GDPR – General Data Protection Regulation.

Web Tracking – Tools that help the College better understand user behavior and inform the College of website visits and the effectiveness of web searches.

“The College,” “we,” “us,” or “our,” when used in this document refers to Rollins College as the party responsible for information under this Privacy Statement.

III. Procedure or Application

The privacy and general data protection regulation security statements provided in Appendices A and B will be posted on the College’s www.rollins.edu website upon approval of this policy. The statements will be reviewed annually and modified as necessary.

IV. Related Policies

Not applicable.

V. Appendices/Supplemental Materials

Appendix A: *Rollins College Privacy Statement*

Appendix B: *Rollins College European Union’s General Data Protection Regulation (GDPR) Statement*

VI. Effective Date

This policy is effective 11/01/2019 and supersedes all previously issued versions.

VII. Rationale for Revision

Not applicable.

APPENDIX A

Rollins College Privacy Statement

Rollins College is committed to protecting your privacy and the personal information you share with us in the usual course of business. This Privacy Statement describes in general terms how Rollins College collects personal information from you and governs the usage of that information. Nothing in this statement should be construed as an intent to violate any state, federal, or legal requirements. Where in conflict, the College will adhere to state and federal regulations, while remaining committed to protecting and respecting the privacy of all individuals, regardless of their geographic location.

When this statement mentions “the College,” “we,” “us,” or “our,” it is referring to Rollins College as the party responsible for your information under this Privacy Statement. This statement addresses the following topics.

- [Information We Collect](#)
- [How We Collect Your Information](#)
- [How We Use Your Information](#)
- [Sharing Your Information with Others](#)
- [Your Rights Under GDPR — For persons within the European Economic Area \(EEA\)*](#)
- [Web Tracking](#)
- [Disabling Web Tracking](#)
- [Links to Other Websites](#)
- [Data Retention](#)
- [Changes to this Privacy Statement](#)

Information We Collect

We collect personally identifiable information through the Rollins.edu website and other College software platforms in manners described in this statement. If we have your consent to do so, or if the information is required for legal processes or to fulfill other College purposes, we may sell, trade, or transfer to third parties the information you provide to us. Rollins College has no obligation with respect to non-personally identifiable information.

Rollins College does not intentionally or knowingly collect or solicit personal information from children under the age of 13 without prior parental/guardian consent or notification. Such notification includes an opportunity for the parent/guardian to prevent use of the information and/or participation in the activity.

We may collect the following types of personal information about you, including information you provide, information we obtain from third parties, or otherwise.

- Your name and contact information such as address, email address, and telephone number, as well as your date of birth, social security number (or other tax identification number), passport number, driver’s license details, country of domicile, and your nationality.
- Information relating to your education and employment history, the school(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study, examination results, and any conduct concerns. If you are a student, we will also keep records relating to assessments of your work, details of examinations taken, your predicted and actual examination grades, and other information in your student record.

- Information about your family or personal circumstances and both academic and extracurricular interests, for example where this is relevant to the assessment of your suitability to receive a scholarship, eligibility for FAFSA, or to provide you with appropriate care.
- Sensitive personal information, including:
 - information concerning your health and medical conditions (e.g., disability and dietary needs, care from our health and wellness programs, or accommodations for a disability);
 - criminal convictions (where provided and authorized in connection with application to the institution or upon application for employment); or
 - information about your racial or ethnic origin, your gender, your religion, or similar beliefs.

Unless you take steps to browse anonymously or opt-out (see Disabling Web Tracking, below), Rollins College, tracks web browsing patterns to inform understanding of how our websites are being used. As a result, we may collect automatically certain information when you use Rollins College websites or services. For example, the following information about you may be automatically collected: browser type, data regarding network connected hardware (devices), IP address, general region, pages visited, and use of Rollins College websites/services. This information is collected in some sections of Rollins College-owned websites by Google Analytics which uses cookies to help us analyze how users use our sites (see Cookies in Disabling Web Tracking below for more information).

How We Collect Your Information

We may collect your personal information in several ways, including, but not limited to the examples below:

- from the information you provide to us when you interact with us before attending, for example when you express your interest in studying at Rollins College;
- from the information you provide to us during event registration and ticketing;
- when you apply to study at Rollins College and complete enrollment forms, applications, and other admission procedures such as immigration related information;
- when you communicate with us in person, by telephone or email, or via our website, for example to make inquiries or raise concerns;
- when you apply for employment or volunteer experiences at Rollins College;
- in various other ways as you interact with us during your time as a student, employee, donor, parent, volunteer, sponsor, or third party of Rollins College, including through photography, social media, and digital image/video; or
- from third parties, for example from your previous or current school, College, or employers who may provide a reference about you or who may sponsor your studies or from services where you may have opted-in to receive communication from undergraduate or graduate programs (e.g. standardized testing services or honor societies/student associations).

How We Use Your Information

We may process your personal information because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal information for the following:

- to interact with you before you are enrolled as a student or before employment as part of the admissions or staff recruitment process (e.g. to send you information or answer inquiries about our courses);

- to interact with you before you decide to donate to the College (e.g. to communicate with you regarding donor opportunities);
- once you have enrolled or been employed, to provide you with the services as set out in our College policies, procedures or contracts;
- to deal with any concerns or feedback you may have; or
- for any other purpose for which you provide us with your personal information.

We may also process your personal information because it is necessary for the performance of our tasks carried out in the public interest or because it is necessary for our or a third party's legitimate interest. In this respect, we may use your personal information for the following:

- to provide you with educational services which may not be set out in our policies or procedures, but which nevertheless are a part of our academic and educational mission;
- to provide you with services usually provided by an employer which may not be set out in our College policies, procedures, or contracts but which nevertheless are a part of our mission and regular course of business;
- to monitor and evaluate the performance and effectiveness of the College, including by training our staff or monitoring their performance;
- to maintain and improve the academic, corporate, financial, real estate, and human resource management of the College;
- to promote equality and diversity throughout the College;
- to seek advice on our rights and obligations;
- to recover money you owe to us; or
- for fundraising purposes.

We may also process your personal information for our compliance with our legal obligations. In this respect, we may use your personal information for the following:

- to meet our compliance and regulatory obligations;
- to meet local, state, and federal laws;
- for the prevention and detection of crime; or
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal information where:

- it is necessary for medical purposes (e.g. medical diagnosis, provision of health or social care or treatment, or a contract with a health professional);
- it is necessary to protect your or another person's vital interests; or
- we have your specific or, where necessary, explicit consent to do so.

Sharing Your Information with Others

For the purposes referred to in this Privacy Statement and relying on the basis for processing as set out above, we may share your personal information with certain third parties. You are given the opportunity to opt out of

some of these data sharing arrangements, for example when you register with us, but you should consider carefully the possible impact of doing this. Unless an opt-out is in place for certain data sharing arrangements, we may disclose limited personal information to a variety of recipients. There are three categories in which the sharing of personal information may fall: (1) where Rollins College is legally required to share information; (2) where the student has a relationship that involved Rollins College and another organization/institution and sharing of information between Rollins and the other is necessary or authorized by the student; or (3) where the sharing is authorized by the student. The following personal information that may be shared is organized by these categories:

1	2	3
<ul style="list-style-type: none"> -Student sponsors (e.g., student loan company, research sponsors); -Professional and regulatory bodies in relation to the confirmation of qualifications, professional registration and conduct, and the accreditation of courses; -Government departments and agencies where we have a statutory obligation to provide information; -Crime prevention or detection agencies; and -Parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure in compliance with FERPA). 	<ul style="list-style-type: none"> -Student sponsors (e.g., student loan company, research sponsors); and -Current or potential education providers (for example, where you take part in an exchange program or transfer to another institution). 	<ul style="list-style-type: none"> -Current or potential education providers (for example, where you take part in an exchange program or transfer to another institution).

*If you are a citizen of the European Union (EU) or a non-EU citizen located within the European Economic Area (EEA), then additional information specific to the EU legal framework for processing your personal information is conducted in accordance with Regulation 2016/679, the General Data Protection Regulation (GDPR).

Your Rights Under GDPR

The GDPR gives EU data subjects additional rights over how their personal data is collected, processed, and transferred by data controllers and processors. If you fall under GDPR protection (see **Who is Affected**) then, upon request and in certain cases, you may have the right to, among other things:

- obtain confirmation from the data controller as to whether your personal data is being processed, where it is being processed, and for what purpose it is being processed;
- access to your personal data and related information that an organization has collected about you;
- correct any of your personal information that is inaccurate;
- know the reason for your data being collected and the categories of personal data that an organization processes;
- know the retention period an organization will store your personal data;
- restrict or limit how we use your personal information;

- request the limiting of the organization’s processing;
- object to the processing of your personal information: you have the right to lodge a complaint with a supervisory authority in the member state of your habitual residence;
- request your personal information to be deleted;
- obtain a copy of your personal information in an easily accessible format;
- transmit your personal information to another controller, including to have it transmitted directly where technically feasible;
- withdraw your consent to the processing of your personal information, if processing is solely based on your consent; or
- be notified by a breach notification within 72 hours of first having become aware of a breach.

If you withdraw your consent to the use or sharing of your personal information for the purposes set out in this Privacy Statement, you may not have access to all (or any) of the services and we might not be able to provide you all (or any) of the services. Please note that, in certain cases, we may continue to process your personal information after you have withdrawn consent and requested that we delete your personal information, if we have a legal basis to do so. For example, we may retain certain information if we need to do so to comply with an independent legal obligation, if it is necessary to do so to pursue our legitimate interest in keeping the services safe and secure, or if deleting the information would undermine the integrity of a research study in which you are enrolled.

GDPR requires organizations whose core activities consist of processing operations which require regular and systematic monitoring of data subjects on a large scale or of special categories of data or data relating to criminal convictions and offenses to appoint a Data Protection Officer. For that reason, Rollins College has appointed Matt Hawks, Associate Vice President of Human Resources and Risk Management, as its Data Protection Officer. For additional information, please see our [GDPR Information Page](#).

Web Tracking

The College’s website uses a variety of methods (i.e., cookies and tracking pixels) to improve the users experience while visiting the website. These tools help the College to better understand user behavior; the tools tell us which part of our website you have visited and measure the effectiveness of web searches.

As do many other institutions and organizations, Rollins College dedicates some sections of its website for use by third-party services, such as Google analytics, to track web-browsing patterns. This helps us to better understand how our website is being used. The information is generated using “cookies” and similar technologies and includes data in order to compile website activity and other material relating to navigating throughout our site.

Cookies are small data files that are placed on your computer or mobile device that allow us to collect certain information whenever you visit or interact with our services. Cookies are used to make websites work properly or more efficiently, as well as to provide information to us.

Rollins College uses first party, third party, session, and persistent cookies. First party cookies are set by the site you are visiting, while third party cookies are set by a third-party site separate from the site you are visiting. Session cookies are stored in memory and are permanently lost when a browser is closed. Persistent cookies are stored on your device between browser sessions in order to allow us to remember your preferences or actions across various sites.

Disabling Web Tracking

Should you decide to disable web tracking, you have a variety of tools to control cookies, as shown below.

- **Browser Controls**
 - By changing your web browser settings, you have some control to block, reject, and delete most cookies. However, by choosing to reject cookies you may not be able to take advantage of certain features, services, applications, or tools made available using these technologies through Rollins College.
- **Do Not Track**
 - You should check with your provider or with your preferred browser regarding how to disable web tracking. Some web browsers can transmit “Do Not Track” signals. Your browser choice and disabling web tracking may impact your experience with our website.

Links to Other Websites

The Rollins College website(s) may contain links to other websites not affiliated with the College. This Privacy Statement does not apply to these websites nor are we responsible for the privacy practices of these other sites. We encourage you to read the privacy statements of other sites for assurance that their practices safeguard your privacy.

Data Retention

Rollins College keeps the data it collects in accordance with the retention periods of applicable federal law and the College’s Record Retention Policy.

Changes to this Privacy Statement

Rollins College has the discretion to update this Privacy Statement at any time. Privacy conditions and compliance change over time. This document is updated to the best of our ability. When we do, we will revise the date at the bottom of this page. We encourage you to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. It is your responsibility to review this Privacy Statement periodically and become aware of modifications.

APPENDIX B

Rollins College European Union's General Data Protection Regulation (GDPR) Statement

For Individuals Affected by the European Union's General Data Protection Regulation (GDPR)

Sections:

- [What is GDPR?](#)
- [Who is Affected?](#)
- [How will GDPR Impact Rollins College?](#)
- [What is Considered Personal Data?](#)
- [Legal Bases for Using Personal Data](#)
- [International Transfers](#)
- [Personal Data Retention](#)
- [Your Rights Under GDPR](#)
- [Data Protection Officer](#)

What is GDPR?

The GDPR replaced the Data Protection Directive 95/46/EC in May 2018 to harmonize data privacy laws across Europe, protect and empower all EU citizens' data privacy, and reshape how organizations approach data privacy.

Who is Affected?

Organizations located within the EU and those located outside that offer goods or services to or monitor the behavior of EU data subjects are affected. The GDPR applies to all organizations processing and holding the personal data of individuals residing in the EU, regardless of an organization's location. If you are physically located in the EU, regardless of nationality or permanent place of residence, your personal data is protected by GDPR.

How Will GDPR Impact Rollins College?

Rollins College prides itself on being a diverse community that seeks to advance global citizenship. As such, there are members of the College community who may be residing (permanently or temporarily) in the EU and/or who are EU residents attending or working for the College. As a result, Rollins College must comply with GDPR, which will affect the College's methods of collecting, storing, and processing personal data.

There are two basic categories that comprise a legal basis for collecting and processing EU data subjects' personal data: (1) consent from the data subject and (2) one of the specified business reasons outlined in the GDPR. Consent requirements under GDPR are very specific and limit the use of personal data for uses other than those specifically stated.

What is Considered Personal Data?

GDPR defines personal data as any information relating to an identifiable person who can be directly or indirectly identified by reference to that personal data. As such, the following are personal identifiers: name, identification number, location data, and online identifier. The scope of information that can be considered personal data is subject to change as technology and the way that organizations collect information about people change.

Legal Bases for Using Personal Data

Rollins College processes your personal data only if we have a legal basis to do so, including:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party;
- where you have given consent to our specific use.

Purposes for which we will process the information	Legal Basis for the processing
To deliver services to users and process transactions.	It is necessary for us to process your personal data in order to deliver the services and process transactions according to the applicable contract between us.
To send communications to you about our products, services, promotions, offers, news, and events.	We will send electronic communications (such as emails and SMS messages) to you if you have consented to these communications. With respect to other communications, it is in our legitimate interest to communicate to you about our products, services, promotions, offers, news, and events. We consider this use to be proportionate and will not be prejudicial or detrimental to you.
To determine how you found out about us.	It is in our legitimate interest to understand how our customers find our Website and/or our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you.
To serve advertising, content, and offers to you based on your interests and online activities, from us or third parties.	We will serve you advertising, content, and offers to you based on your interests and online activities if you have consented to this processing.
To enable our service providers to perform certain activities on our behalf.	It is necessary for us to process your personal data in this manner in order to deliver the services and process transactions according to the applicable contract between us. It is also in our legitimate interest to enable our service providers to perform certain activities on our behalf. We consider this use to be proportionate and will not be prejudicial or detrimental to you.
To notify you of any changes to the College's website that may affect you.	It is necessary for us to process your personal data in order to deliver the services and process transactions according to the applicable contract between us.
To contact you or to respond to your communications, including to provide you with products and information you request.	It is necessary for us to process your personal data in order to communicate with you.

Purposes for which we will process the information	Legal Basis for the processing
To improve the College’s website, your experience, and quality of service.	It is in our legitimate interest to improve our website, your experience, and quality of service. We consider this use to be proportionate and will not be prejudicial or detrimental to you.
To administer our Website including troubleshooting, data analysis, testing, research, statistical, and survey purposes; and To improve the College’s Website to ensure that consent is presented in the most effective manner for you and your computer, device, or other item of hardware through which you access the website.	For all these categories, it is in our legitimate interest to continually monitor and improve our services and your experience of the College’s website and to ensure network security. We consider this use to be proportionate and will not be prejudicial or detrimental to you.
To keep the College’s website safe and secure and to prevent and detect fraud and abuse; and To comply with our legal obligations, policies, and procedures.	We conduct this processing to comply with our legal obligations and to protect the public interest.
To process otherwise for internal administrative and analytics purposes.	It is in our legitimate interest to process your personal data for internal administrative or analytics purposes. We consider this use to be proportionate and will not be prejudicial or detrimental to you.

International Transfers

Some of our processing of your data will involve transferring your data outside the European Economic Area (EEA). Some of our external third-party service providers are also based outside of the EEA, and their processing of your personal data will involve a transfer of data outside the EEA. This includes the United States, where personal data is transferred to and stored in a country not determined by the European Commission as providing adequate levels of protection for personal data, we take steps to provide appropriate safeguards to protect your personal data, including entering into standard contractual clauses approved by the European Commission, obliging recipients to protect your personal data.

Personal Data Retention

Rollins will retain your personal data for as long as necessary for the purposes it was attained, such as to enable you to use the College’s website and products or to provide services to you. In some instances, we may retain data for longer periods in order to comply with applicable laws (including those regarding document retention), resolve disputes with any parties, and otherwise as necessary to allow us to conduct our business. All personal data we retain will be subject to the College’s Privacy Statement and our internal retention guidelines.

Your Rights Under GDPR

The GDPR gives EU data subjects new rights over how their personal data is collected, processed, and transferred by data controllers and processors. If you are protected under the GDPR (see [Who is Affected?](#)) then, upon request and in certain cases, you may have the right to, among other things:

- obtain confirmation from the data controller as to whether your personal data is being processed, where it is being processed, and for what purpose it is being processed;
- access to your personal data and related information that an organization has collected about you;

- correct any of your personal information that is inaccurate;
- know the reason for your data being collected and the categories of personal data that an organization processes;
- know the retention period an organization will store your personal data;
- restrict or limit how we use your personal information;
- request the limiting of the organization’s processing;
- object to the processing of your personal information: you have the right to lodge a complaint with a supervisory authority in the member state of your habitual residence;
- request your personal information to be deleted;
- obtain a copy of your personal information in an easily accessible format;
- transmit your personal information to another controller, including to have it transmitted directly, where technically feasible;
- withdraw your consent to the processing of your personal information, if processing is solely based on your consent; and
- be notified by a breach notification within 72 hours of first having become aware of a breach.

If you withdraw your consent to the use or sharing of your personal information for the purposes set out in the College’s Privacy Statement, you may not have access to all (or any) of the services and we might not be able to provide you all (or any) of the services. Please note that, in certain cases, we may continue to process your personal information after you have withdrawn consent and requested that we delete your personal information, if we have a legal basis to do so. For example, we may retain certain information if we need to do so to comply with an independent legal obligation or if it is necessary to do so to pursue our legitimate interest in keeping the services safe and secure or if deleting the information would undermine the integrity of a research study in which you are enrolled.