

# **SALISBURY UNIVERSITY**

## **X-26.00 Privacy Policy**

### **I. Policy**

Salisbury University (the “University”) is committed to the responsible use of personal and sensitive information collected from and about its students, faculty, staff, and others who provide such information to the University. This commitment is in accordance with state and federal laws and regulations concerning the use of such information. The University Privacy Policy applies to all faculty, staff, students, as well as affiliates and third-party service providers, where applicable.

### **II. Purpose**

The purpose of this policy is to protect the privacy of individuals who have either personally identifiable or confidential information (as defined in University Policy X-18.00) stored on assets owned by the University, either in electronic or paper form, while at the same time providing the University the ability to share this information with authorized University personnel, entities as required for legitimate academic or business needs or by law.

### **III. Definitions**

- A. **Official University Websites** Except as noted, the information in this Privacy Policy applies to all official University websites. Official University websites are web pages of the University, schools, departments, divisions or other units and any other sites specifically designated as official by the president, a vice president, dean, department head or director. Official websites are generally recognizable by a standard template/layout carrying the University logo, contact information and reference to the University’s Privacy Statement.
- B. **Unofficial Websites:** Within the University domain – signified by the address "salisbury.edu" or within the range of Internet protocol addresses assigned to the University –websites may be found over which the University has no editorial responsibility or control. Such sites are considered unofficial and include, but are not limited to, the web pages of individual faculty members, students, student organizations and other entities not formally a part of the University. While the University encourages compliance with this Privacy Policy on such sites, in order to better understand the policies and practices under which they operate, the privacy statements of individual sites should be consulted or information sought directly from the persons responsible for those sites.

C. Cookies: Cookies are files that many websites transfer to users' web brow-3 ((e)1 (raJ 0.01 (raJ 0.

and to information that appears on the University's websites. Official University websites are defined as the web pages of the University, schools, departments, divisions or other units and any other sites specifically designated as official by the president, a vice president, dean, department head or director. Official websites are generally recognizable by a standard template/layout carrying the University logo, contact information and reference to the University's Privacy Statement. Please be advised that the University's websites may contain links to other websites over which the University has no control. The University is not responsible for the privacy and protection of any personally identifiable or confidential information on such sites."

B. Lawful Basis for Collecting and Processing of Personal/Sensitive Information

The University is an institution of higher education involved in education, research, and community development. In order for the 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 lawful for the University to collect, process, use, and maintain data of its applicants, students, staff, faculty, research subjects, and others. A lawful basis exists for collecting and processing information related to the following: admissions, registration, delivery of classroom instruction (both in class and on-line), study abroad education, grades, communications, employment, research, development, program analysis for improvements, alumni relations, marketing, and records retention. Examples of data that the University may need to collect when carrying out its necessary functions include, but are not limited to: name, email address, ID numbers, IP address, physical address or other location identifier and photos as well as other

D. Where the University Gets Personally Identifiable and Confidential Information

1. The University receives personal and sensitive information from multiple sources. Most often, the University gets this information directly from consenting individuals or from consenting individuals who have provided it to a third party (for example, applications for admission to the University).
2. University departments shall post a link to the University Privacy Policy on any website which collects data about website visitors.

E. University Websites

1. The University's website consists of many websites. Some sites hosted by the University may adopt different privacy statements as their specific needs require. However, no site can adopt a privacy statement that is in any way inconsistent with the University Privacy Statement, stated above, state or federal laws or regulations or the EU GDPR.
2. Office, department, and program (collectively "Unit") webpages are managed by appointed webpage managers within their Unit. Webpage managers are responsible for ensu

**V. Rights of Individuals under the EU GDPR**

- A. Individuals who fall within the scope of the EU GDPR and whose information is coll

wishes to exercise any of the above-mentioned rights may do so by first contacting the applicable department, office or program and then by contacting the Information Technology Department which shall consult with the Office of the General Counsel.

## **VI. Processing of Personal Information Subject to the EU GDPR**

- A. The 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 admission to the University, enrollment, educational programs, employment, 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.
  
- B. Most of the University's collection and processing of personal data will fall under at least one of the following categories:
  - i. the individual has given consent to the processing of his or her information for one or more specific purposes;
  - ii. the processing is necessary for the performance of a contract to which the

## **VII. Violations and Sanctions**

- A. Violation of this Policy may incur the same types of disciplinary measures and consequences as violations of other University policies, including progressive discipline up to and including termination of employment, or, in a case involving a student, reporting of a Student Code of Conduct violation.
  
- B. All individuals accessing personal and sensitive information are required to comply with federal and state laws, and University policies and procedures regarding such information. Any University student, faculty or staff member who engages in the unauthorized use, disclosure, alteration, or destruction of data in violation of this Policy will be subject to appropriate disciplinary action, including possible dismissal and/or legal action. Other persons who may violate this policy, such as a University third-party