



# Online Privacy Statement

## PURPOSE

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Washtenaw Community College (WCC) provides this website (“Site”) to students, prospective students, faculty, staff, alumni and visitors of the WCC electronic community for legitimate academic and administrative pursuits as outlined by the College's mission statement.

WCC is committed to safeguarding the privacy of personal data in compliance with federal and state laws, as well as WCC policy. This privacy statement outlines the collection, use and disclosure of information provided to the College through this Site and its other associated online services available for students, applicants, employees and alumni.

## CONSENT

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Your use of this Site is subject to all applicable state and federal laws, as well as general College policies. When you submit information to WCC, or you use this Site and other services, you consent to the collection, use and disclosure of that information as described in this *Online Privacy Statement*.

If you provide information directly to WCC from a location in one of European Union (EU) member states or European Economic Area (EEA), you consent to the transfer of your personal information outside the EU/EEA to the United States.

The site may contain links to other Internet Web sites, including co-branded or other affiliated sites that may or may not be owned or operated by WCC. Unless otherwise explicitly stated, the College is not responsible for the privacy practices or the content of such sites, including such sites’ use of any information collected when visitors to the site click through links to those sites.

Please note that WCC periodically reviews these privacy practices, thus they are subject to change. To contact WCC with questions or issues concerning this online privacy statement or its application, please send email to WCC's Information Security Office at [infosec@wccnet.edu](mailto:infosec@wccnet.edu) or +1-734-477-8911.

## **WHAT INFORMATION DO WE COLLECT?**

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This Site collects two types of information: (a) information that is collected automatically when you visit this Site through cookies, third party tracking technologies, and log data; and (b) information you voluntarily provide to the College as a component of our services, which may include personal information (such as your name, address, e-mail address, etc.).

### **Cookies**

This website uses "Cookies" to help manage web site activity. A cookie is a piece of data sent to your browser from a web site and stored locally on your computer that is either maintained only for the duration of a particular session visit or is stored on the user's computer to support future visits. See [Wikipedia's Cookie](#) page for more information.

This Site uses cookies for two main purposes: (a) to carry information about your current session as you move from one web page to the next, which also allows account holders to utilize single sign-on to automatically login to other WCC websites; and (b) to identify you on return visits.

You may refuse the use of cookies by selecting the appropriate settings on your browser. However, if you do not accept cookies, you may not be able to use some portions of our Site.

### **Google Analytics**

This Site uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to analyze the behavior of visitors to this Site and the information is collected for the purpose of evaluating your use of the various parts of this Site, compiling reports on website activity for website operators, and providing other services relating to website activity and internet usage. Site usage data collected through Google Analytics is not shared with other Google products and tools. See [Google's Privacy Policy](#) and the [Google Analytics Terms of Service](#) for further information.

You can opt-out of making your site activity available to Google Analytics through installation of the [Google Analytics Opt-out Browser Add-on](#).

### **Log Data**

We collect informational data (“Log Data”) related to the transactions performed by your computer and browser whenever you visit our Site.

This Log Data includes information such as your computer's Internet Protocol (“IP”) address, operating system and browser type and version, the pages of our Site that you visit, any files downloaded, the time and date of your visit, the time spent on those pages, any errors encountered and other statistics.

This information is collected to assist in diagnosing any server problems, site and security administration, identifying the most popular areas of the site, and determining the sites effectiveness.

### **Voluntary or Personal Information**

WCC is an institution of higher education and as such we must collect certain “Information” about you, including Personal Identifiable Information (and certain Sensitive Information, as defined in the European Union’s General Data Protection Regulation), as a component of certain academic and administrative processes and responsibilities. The College will only collect personal information that you knowingly and voluntarily provide by, for example, applying for admission, enrolling in College courses, seeking employment at the College, or are alumni of the College. The information collected, transmitted and process by the College is subject to WCC’s *Data Classification Policy*.

### **HOW DO WE USE THIS INFORMATION?**

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WCC may use Information collected from students, prospective students, alumni, faculty, staff and prospective employees to register and enroll persons in the College, apply for employment, manage student and employee accounts, manage financial aid, provide academic advising, deliver education programs, analyze and improve education programs, outreach, receive donations, make regulatory reports, comply with accreditation requirements, and other related College processes and functions. WCC may also use Information to conduct general demographic

and statistical research to improve College programs. The College processes such Information as necessary in the exercise of the College's legitimate interests, functions and responsibilities as a public higher education institution.

WCC may share Information with third parties who have entered into contracts with the College to perform functions on our behalf, subject to the obligation of confidentiality and safeguards against unauthorized disclosure.

Generally, it is the College's practice to use Information only for the purposes for which it was collected. However, Information collected may be subject to the College's obligation to respond to subpoenas, court orders, discovery requests and requests for public records under the Michigan Freedom of Information Act.

WCC reserves the right to release any and all Information contained within data logs concerning any visitor when they are deemed to be in violation of the College's *Computing Resource Usage Policy* or other published guidelines, or engaged in any illegal or disruptive activity, even without a subpoena, warrant, or other court order, and to release such information in response to discovery requests, or in response to any circumstance in which the College, in its sole discretion, deems an emergency. WCC cooperates with law enforcement agencies in identifying those who may be using its resources or services for illegal activities. WCC also reserves the right to report any suspected illegal activity to law enforcement for investigation or prosecution.

Personal Information you submit through our Site, such as your name, address and other contact information, may be collected by the College for internal marketing and development purposes as well as to respond to your inquiry, complete a transaction for you, or fulfill other forms of customer service. We will not share, sell, rent, swap or authorize any third party to use your contact information for commercial purposes without your permission.

WCC limits its own contact and solicitations to those users who have not "opted out" of receiving such communications. The solicitations are limited in that they, among other things, will clearly indicate the originator of the email and provide the user with a method of "opting out" of receiving future communications of a similar nature.

## **HOW LONG DO WE STORE THE INFORMATION WE COLLECT?**

WCC retains any personal information collected for at least the minimum required retention according to applicable schedules located in the WCC Record Retention Schedules or for at least the duration of your relationship with College.

## **HOW DO WE STORE & PROTECT INFORMATION?**

WCC uses appropriate technical and organizational security measures to protect the confidentiality, integrity and availability of your information when you transmit it to the College. All information gathered on the Site is stored within a controlled database accessible only to those authorized. While this Site has reasonable security measures in place to help protect against the loss, misuse, and alteration of the information under our control, no method of transmission over the Internet or method of electronic storage is 100% secure.

Although the College has security measures in place to protect personal information provided to us, users should also take steps to protect their personal information and its disclosure. Information disclosed in email, chat rooms, social media and other similar forums may become public. Users should therefore exercise caution before disclosing personal information when using these modes of communication. The College will never ask you to provide personal information to us via an insecure method of communication.

WCC complies with the Payment Card Industry Data Security Standard (PCI-DSS). When you engage in financial transactions at our Site, you may be asked for a credit card number. Unless otherwise noted, all credit card transactions are encrypted and handled by an external credit card payment gateway. The College does not retain credit card account number information.

## **CHILDREN OR MINORS**

This Site does not knowingly collect personal information from children or minors under age 13 as defined by the Children's Online Privacy Protection Act (COPPA).

## **“DO NOT TRACK” SUPPORT**

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"Do Not Track" (DNT) is a web browser setting that seeks to disable tracking of an individual's browsing activities. It is a proposed standard that is under development. This Site does not currently respond to "Do Not Track" settings.

## **RIGHTS FOR DATA SUBJECTS IN THE EUROPEAN UNION**

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To the extent applicable, the EU's General Data Protection Regulation (GDPR) grants data subjects in the EU the right, in certain circumstances, to request access to, a copy of, rectification, restriction in the use of, or erasure of your information. Your requests pursuant to the GDPR will be subject to the retention periods of applicable U.S. federal and state law. The GDPR provides further information about your rights. You also have the right to lodge complaints with your national or regional data protection authority. If you elect to exercise your rights under the GDPR, please contact WCC's Information Security Office at [infosec@wccnet.edu](mailto:infosec@wccnet.edu) or +1-734-477-8911.

## **REVISION HISTORY**

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<b>Version</b>	<b>Description</b>	<b>Revision Date</b>	<b>Review Date</b>	<b>Approver</b>
1.0	Initial version	10/11/18	-	WJO