

PRIVACY POLICY

Effective Date: September 9, 2019

Augsburg University is committed to protecting the privacy of individuals (“you” or “your”) who share personal data with us.

We value and respect your privacy. Information you entrust to Augsburg University will be handled with care and respect. This Privacy Policy is designed to assist you in understanding how we collect, use, and share personal information you provide to Augsburg University (“Augsburg,” “us,” or “we”) through www.augsburg.edu, the main Augsburg University website (the “Site”). This Privacy Policy (“Policy”) discloses the privacy practices for the Site. To the extent permitted by applicable law, by using the Site, you are consenting to our collection and use of information in accordance with this Policy. This Policy does not apply to information we may collect from you via other means, such as by phone, mail or fax.

The Site is not intended for children, and we do not knowingly collect data relating to children under the age of 13.

What information do we collect?

Information you manually provide

Augsburg collects the information you manually provide (using your keyboard, mouse, or touchpad) when you use this Site. For example, we collect the information you provide when you request information from us, apply for admission, register for campus visits, or otherwise interact with this Site. Some of the information you provide may be personally identifiable information.

Types of personally identifiable information include, but are not limited to:

- full name
- address
- email address and phone numbers
- your parent’s(s’) full name(s), address(es), email address(es) and phone number(s)
- gender
- ethnicity
- academic information
- current and future enrollment information
- involvement in work, school, and community activities
- personal essays
- birth date
- other information you may include on your application form if you submit it through this Site.

Information from your browser or device

Augsburg collects information that is sent to us automatically by your web browser or mobile device. This information typically includes but is not limited to your IP address, the name of your operating system, the name and version of your browser, the date and time of your visit, and the pages you visit.

The information we receive may depend on your browser or device settings. The information we receive from your web browser and device may or may not be personally identifiable. However, we may combine it with other information in an attempt to identify you or we may combine it with information that does identify you. Accordingly, we treat such information as personally identifiable.

Information Collected by Cookies and Other Technologies.

A “cookie” is a small file placed on your device when you visit a site that can be understood by the site that issued the cookie. We use cookies and other technologies, including device identifiers, to collect information and support certain features of this Site. For example, we may use these technologies to:

- collect information about the ways visitors use this Site - which pages they visit, which links they use, and how long they stay on each page;
- support the features and functionality of this Site - for example, to save you the trouble of reentering information already in our database or to prompt the settings you established on previous visits;
- personalize your experience when you use this Site; and
- improve our marketing efforts, including through use of targeted advertising.

The information we collect using cookies and similar technologies may or may not be personally identifiable, but we may link it to personal information that you provide. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. Although you are not required to accept cookies when you visit this Site, you may be unable to use all of the functionality of this Site if your browser rejects our cookies.

Information About Third-Party Cookies and Interest-Based Advertising

In addition to the cookies Augsburg delivers to your computer through our Site, certain third parties may deliver cookies to you for a variety of reasons. For example, we use Google Analytics, a web analytics tool that helps us understand how visitors engage with our Site. To learn more about Google Analytics, see the [Google Analytics Terms of Service](#).¹

Other third parties may deliver cookies to your computer for the purpose of tracking your online behaviors across nonaffiliated websites and delivering targeted advertisements either on our Site or on other websites.

You have choices about the collection of information by third parties on our Site. For example, if you don't want information about your visit to our Site sent to Google Analytics, you may [download the Google Analytics Opt-out Browser Add-on](#).² Please note that the Add-on does not prevent information from being sent to Augsburg.

In addition, if you would like to opt-out of having interest-based information collected by certain entities during your visits to our Site or other websites, please see the [Digital Advertising Alliance's WebChoices Tool](#).³ You will be directed to an industry-developed website that contains mechanisms for choosing

¹ Google Analytics Terms of Service URL is <https://marketingplatform.google.com/about/analytics/terms/us/>.

² Google Analytics Opt-out Browser Add-on URL is <https://tools.google.com/dlpage/gaoptout>.

³ Digital Advertising Alliance's WebChoices Tool URL is <http://optout.aboutads.info/>.

whether each listed entity may collect and use data for online behavioral advertising purposes. It may be that some of the third parties that collect interest-based information on our Site do not participate in the industry-developed opt-out website, in which case the best way to avoid third-party tracking of your online behaviors may be through your browser settings and deletion of cookies.

How do we use information we collect?

Generally, we use the information we collect through this Site:

- to provide the information you request;
- to provide payment processing and account management;
- to consider your candidacy for admission to Augsburg,
- to evaluate your eligibility for financial aid;
- if you are admitted and enroll at Augsburg, to facilitate your education;
- to maintain an ongoing relationship with alumni, donors, and prospective donors, and to help connect them with others;
- to request gifts or donations;
- to provide online education courses and programs;
- to conduct our operations and administer our educational offerings;
- for our marketing and promotional efforts;
- to prevent, investigate, take action regarding, or provide notice of fraud, unlawful or criminal activity, other misconduct, security or technical issues, or unauthorized access to or use of information, our Site, or data systems;
- to meet our legal obligations;
- to evaluate the Site and improve its usability;
- to enable interaction with other websites; and
- for any other purpose identified in an applicable privacy notice, click-through agreement, or other agreement between you and us.

Your Choices

In General

We respect your right to make choices about the ways we collect, use, and disclose the information you provide on or through this Site. We strive to provide choices to you at a meaningful time and in a meaningful place. This Notice describes some of your other choices.

Do Not Track Mechanisms

Your browser may deliver a “Do-Not-Track (‘DNT’) signal” to this Site. Because of the changing state of technology and indecision within the technology and marketing industries regarding the meaning of DNT signals, we currently do not make any guarantee that we will honor DNT signals.

Previously Expressed Preferences

You may change previously expressed preferences regarding how we use information you provide on or through this Site. For example, if you have provided your contact information and receive periodic emails from us, you may decide to stop receiving those emails by clicking the “unsubscribe” link in an

email's footer. You may be able to change other preferences through an account you create on this Site. Otherwise, please contact us using the contact information provided below.

Marketing

In relation to marketing communications, we may provide you with an "opt-in" or "opt-out" mechanism depending on where in the world you are located. An "opt-in" mechanism will provide you the opportunity to positively indicate that you agree to our sending you such further communications and we will not send you any unless you have "opted-in." An "opt-out" mechanism will provide you the opportunity to indicate that you do not want us to send you such further communications, and if you "opt-out," we will not send you any.

How do we safeguard your information?

We maintain appropriate administrative, physical, and technological measures to protect the confidentiality and security of personal information you submit on or through this Site. Unfortunately, no website, server or database is completely secure or "hacker proof." We therefore cannot guarantee that your personal information will not be disclosed, misused, or lost by accident or by the unauthorized acts of others. Further, we cannot control dissemination of personal information you post on or through this Site using any social networking tools we may provide, and you should have no expectation of privacy in such information.

How do we share information with others?

With Third-Party Vendors

Augsburg shares information collected through this Site with third-party vendors who act on our behalf. For example, we may use third-party vendors to design and operate this Site, to conduct surveys, and to help us with our promotional efforts. These third-party vendors may need information about you to perform their obligations. They are required by contract to keep your information confidential and to use it only to provide services on our behalf; however, as described below, we may allow them to use aggregate or anonymized data for their own purposes.

With Professional Advisers, Government Authorities, and Regulatory Agencies

We may share information with professional advisers such as lawyers, bankers, auditors, or insurers who provide professional services to us. We may also share your information with government authorities (for example, in relation to tax) or other regulatory agencies as may be required by applicable law.

With Third-Party Social Media Platforms

We may provide functionality on this Site that allows you to automatically post information to a third-party social media platform (such as Facebook, Twitter, or LinkedIn). If you choose to take advantage of this functionality, people with access to your profile on the third-party platform will be able to see your post. Thus, you should have no expectation of privacy in those actions. Further, if you choose to link your profile on this Site with an account on a third-party social media platform, we may share the information in your profile with that third-party platform. We may also use third-party social media platforms to offer you interest-based ads. To offer such ads, we may convert your email address into a

unique value which can be matched by our partner company with a user on their platform. Although we do not provide any personal information to these platform vendors, they may gain insights about individuals who respond to the ads we serve.

In Aggregate or Anonymized Form

We use information collected through this Site to create a compiled, aggregate view of usage patterns. We may share aggregate information with third parties so we and they can better understand our user base. We may also share with third parties information about how particular individuals use this Site, but only on an anonymized basis.

To Comply With Laws and Protection of Our Rights and the Rights of Others

We may disclose your information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order, or a subpoena. We may also disclose your information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of this Site; or to protect our own rights or property or the rights, property, or safety of our users or others.

As Described in a Privacy Notice or Click-Through Agreement

We reserve the right to disclose your information as described in any applicable privacy notice posted on this Site or as described in any click-through agreement to which you have agreed.

Users Located in the European Economic Area

If you are located in the European Union, Iceland, Liechtenstein, or Norway (the "EEA"), in accordance with Article 13 of the European Union General Data Protection Regulation 2016/679 (the "GDPR"), this section of the Policy (together with other relevant section of this Policy) provides information about the collection, use, processing, and sharing of data about you.

For the purposes of this section, "personal data" means any information relating to an identified or identifiable natural person. Augsburg University is the data controller for the purposes of personal data processed through this Site. We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact the data privacy manager using the contact information provided below.

Lawful Bases for Processing

Augsburg processes personal data of visitors to this Site who are located in the EEA for the purposes set out above. The lawful basis for each purpose may be different. Please contact us if you would like to know the specific legal basis which applies in connection with a particular processing operation. In general, the lawful bases that Augsburg relies on are the following:

- Contractual necessity – Augsburg will process your personal data where necessary for us to meet our contractual commitments to you.
- Legitimate interests – this means our interest in conducting and managing our organization to

enable us to give you the best service, providing the best and most secure experience, and fulfilling our mission of educating students to be informed citizens, thoughtful stewards, critical thinkers, and responsible leaders. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Our legitimate interests include:

- To provide, improve and customize our educational offerings;
 - To administer our operations;
 - To promote the success of our current and former students;
 - To further research and understanding in fields of academic study;
 - To maintain an ongoing relationship with alumni, donors, and prospective donors, and to help connect them with others;
 - To request gifts or donations;
 - To offer attendance to events and opportunities to volunteer;
 - To conduct admissions research;
 - To understand how our Site is being used;
 - To develop and grow our operations;
 - To ensure the safety and security of our students, faculty, fellows, employees, and others;
 - To ensure cybersecurity;
 - To enhance protection against fraud, spam, harassment, intellectual property infringement, crime, and security risks; and
 - To meet our obligations and enforce our legal rights.
- Consent or Explicit Consent – In accordance with applicable law, we may seek your consent or explicit consent to process personal data collected on this website or volunteered by you, for example, in relation to our marketing and promotional activities. This may also include the processing of certain “special categories” of personal data, otherwise known as sensitive personal data, as set out in the “What information do we collect” section above.
 - Compliance with laws and regulations – Augsburg will process your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to. For example, the collection of ethnicity information in connection with equal opportunities reporting obligations.

International Transfers of Personal Data Outside of the EEA

As an institution of higher education located in the United States, the processing of all personal data by Augsburg through this Site will take place in the United States. Visitors to this Site acknowledge that personal data provided or collected through this Site will be transferred to the United States.

Augsburg may transfer your personal data to the third parties discussed above. We may transfer your personal data to other parties based outside the EEA relying on appropriate or suitable safeguards or specific derogations recognized under data protection laws, including the GDPR.

Whenever we transfer your personal data to parties based outside the EEA, we ensure a similar degree

of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal data only to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data to parties based outside the EEA.

Rights of Data Subjects

We will provide you upon your reasonable, good faith request with information about whether we hold any of your personal data, to the extent required by and in accordance with applicable law. In certain cases, you may also have a right, with respect to your personal data that we collect and use, to:

- Correct or update any of your personal data that is inaccurate;
- To restrict or limit the ways in which we use your personal data;
- To object to the processing of your personal data;
- To request the deletion of your personal data; and
- To obtain a copy of your personal data in an easily accessible format.

In addition, where we rely on consent to process your personal data, you have the right to withdraw consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you have any complaints regarding our privacy practices, you have the right to make a complaint to your local [EU data protection authority](#).

To submit a request, please complete our privacy information request form. Because we want to avoid taking action regarding your personal data at the direction of someone other than you, we may ask you for information verifying your identity. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

Data Retention

We will retain your personal data for as long as is necessary for the purposes listed in this Policy unless a

longer period is required under applicable law or is needed to resolve disputes or protect our legal rights or otherwise comply with legal obligations.

When assessing the data retention period, we take into account the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the data, the purposes for which we process the data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Failure to Provide Personal Data

Where we need to collect personal data by law or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

This Policy May Change

We are continually improving and adding to the features and functionality of this Site and the services we offer through this Site. As a result of these changes (or changes in the law), we may need to update or revise this Policy. Accordingly, we reserve the right to update or modify this Policy at any time, without prior notice, by posting the revised version of this Policy behind the link marked "Privacy Policy" at the bottom of each page of this Site. To the extent permitted by applicable law, your continued use of this Site after we have posted the revised Policy constitutes your agreement to be bound by the revised Policy. However, we will honor the terms that were in effect when we gathered data from you.

For your convenience, whenever this Policy is changed, we will update the "effective date" at the top of this page. Be sure you check the effective date to see if this Policy has been revised since your last visit.

You may access the current version of this Policy at any time by clicking the link marked "Privacy Policy" at the bottom of each page of this Site.

Contact Us

If you have any questions regarding this Privacy Policy, please contact us at marcomm@augsborg.edu.