

MONTCLAIR

STATE UNIVERSITY

Website Privacy Notice	
Policy Summary:	Explains why the University collects particular information and how it protects users' personal privacy during website visits
Effective Date:	
Last Revision Date:	5/23/18

I. Purpose

The purpose of this Notice is to explain why the University collects particular information and how we will protect your personal privacy when you visit our websites.

The following discloses our information gathering and dissemination practices for all University websites and servers. In order to fully understand your rights, we encourage you to read this Privacy Notice. The University reserves the right to modify this Privacy Notice at any time, and we encourage you to frequently check for any changes to this Privacy Notice.

II. Applicability

This Privacy Notice applies to all University owned websites, domains, services, applications, and technology products, except that a privacy notice specific to another Division, department or unit of the University will supplement and may supersede this Privacy Notice.

III. Definitions (as applicable)

IV. Policy

Links to Other Sites

Our site contains links to other websites maintained or controlled by third parties. Please note that when you click on one of these links, you are entering another website for which the University has no responsibility. We encourage you to read the privacy notices on all third party sites as their policies may be different than ours.

We may also provide social media features that enable you to share information with your social networks and to interact with the University on various social media sites. Please note that when you share your information on these social media sites, you are entering a third party site for

which the University has no responsibility. In addition, your use of these features may result in the collection or sharing of information about you, depending on the feature, by the third party social media site. We encourage you to review the privacy policies, notices and settings on the social media sites with which you interact to make sure you understand the information that may be collected, used, and shared by those sites.

Collection of Personal Information

Personal information is any information that personally identifies you or from which you could be identified. This may include information related to you that can be identified, directly or indirectly, by reference to an identifier such as an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental economic, cultural, or social identify of you.

The University collects, exports, and uses personal information as described in this Privacy Notice.

Site Analytics

The University collects aggregate data about how users interact with the website. This information is collected by Google on behalf of the University. Before storage, the last byte of the user's IP address is removed, ensuring that this data is not sufficient for identifying and tracking individual users.

Cookies

A cookie is a small data file stored in your browser when you visit a website or access an application. In certain cases, the University uses cookies to store information about user preferences. Accepting the cookies used on our site may give us access to information about your browsing behavior, which we may use to personalize your experience. Cookies are typically classified as either "session" cookies or "persistent" cookies.

- Session cookies do not stay on your computer after you close your browser.
- Persistent cookies remain on your computer until you delete them or they expire.

The University's website makes use of session cookies when a user logs in using their NetID and Password. When a user is logged in they are individually identifiable to the web server through these cookies.

Most browsers automatically accept cookies by default, but you can usually refuse cookies or selectively accept cookies by adjusting the preferences in your browser (please refer to your browser's help function to learn more about cookie controls). If you turn off cookies there may be

some features of our site that will not be available to you, and some web pages may not display properly.

Web Beacons

Web beacons (also known as pixel tags, internet tags, clear GIFs, or single-pixel GIFs) and embedded scripts are other technologies that we use on our websites and in our applications, as well as in some of our emails and ads.

Web beacons (or “tags”) are bits of programming code included in web pages, emails, and ads that notify us (or the companies that help us run our business) when those web pages, emails, or ads have been viewed or clicked on. Embedded scripts are bits of programming code included within some of our web pages that measure how you use those web pages, such as which links you click on. We use this information to improve our websites and online services, tailor our websites and online services to your likely interests, and conduct market research.

You may be able to turn off scripting functionality, such as JavaScript, within your browser (please refer to your browser’s help function). If you turn off JavaScript there may be some features of our site that will not be available to you, and some web pages may not display properly.

Advertising and Retargeting on Third-Party Websites

The University contracts with service providers to place ads on websites owned by third parties. These service providers may send third-party cookies from—and use web beacons on—their websites, as well as on the University’s website. These cookies and web beacons may enable the University to collect information about the pages you viewed and the links you clicked on in order to target paid media advertising. At times, these third-party websites may advertise to previous visitors that visited the University’s website but did not complete a task on our site, for example, finishing a contact form to make an inquiry.

The University’s website is configured not to load third-party advertiser retargeting to visitors from the European Union unless they opt in to receive third-party advertiser retargeting.

Most web browsers include a “Do Not Track” feature that offers you the ability to inform websites and ad networks that you do not want your online activities tracked.

Recording Log-in Data

When you log in to the University’s website, we store a unique random number as a session cookie. As a user loads each subsequent page, that number is used to verify and track that you are logged in by the unique random number assigned. This session cookie is stored until you log out or the browser window is closed.

When you log into the University's website using your University assigned credentials, you will be provided the option to store your NetID for your next session.

Use of Log Data (Including Internet Protocol [IP] Addresses)

University sites may log a variety of information including account names, Internet Protocol ("IP") addresses, browser types and versions, times and dates of connections, etc.

An IP address is a number that is automatically assigned to your computer when you use the Internet.

We may use log data to help diagnose problems with our server, administer our site, analyze trends, track users' use of sites, gather broad demographic information for aggregate use in order for us to improve our sites, and to deliver customized/personalized content.

University site logging information:

- Shall be restricted to University employees for whom access to such information is required to provide service or support.
- Will not otherwise be shared with a third party unless a warrant, subpoena, National Security Letter, or other such government or court order that the University Counsel and/or the University Police has determined to be legally executed and compels a response.

Message Boards

If you post, comment, indicate interest or complaint, or share personal information, including photographs, to any public forum on a University site, social network, blog, or other such forum, please be aware that any information you submit can be read, viewed, collected, or used by other users, and could be used to contact you, send you unsolicited messages, or for purposes over which neither you nor the University have control. The University is not responsible for the personal information you choose to provide in these forums.

We will not facilitate the merging of your personally identifiable information with non-personally identifiable information collected through any advertising product or feature unless we notify you, and obtain your consent to, that merger.

University Use of Information

Your personal information will only be used for academic or philanthropic purposes directly connected to or approved by the University, which may include but not be limited to, information related to University programs and services. We may share your personal information with the University and our vendors for the purpose of performing University business.

Third Party Use of Information

Unless otherwise required by law, we will not share your personal information with any other individual or organization, except in the following circumstances:

We disclose your information to third parties as follows:

- **Consent.** We may disclose your information to third parties if we have your consent to do so.
- **Service Providers.** We enter into contracts with third parties to support our operations. In such cases, we may share your information with such third parties who are obligated to safeguard the information in the same manner as the University.
- **Required by Law.** We will share your information with third parties to the extent we are required to do so by law, court order, or subpoena.
- **De-Identified and Aggregate Information.** We use and disclose information about our customers and payees in de-identified or aggregate form without limitation.

How You Can Control Your Data Collection

You can use Google Ads Settings (<http://www.google.com/settings/ads/anonymous>) to manage the Google ads you see and opt-out of interest-based ads. Even if you opt-out of interest-based ads, you may still see ads based on factors such as your general location derived from your IP address, your browser type and recent, previous searches related to your current search.

You can also opt-out of anonymous website and/or application traffic behavior by clicking on the following opt-out privacy links:

- Adobe Analytics Opt-Out: <http://www.adobe.com/privacy/opt-out.html>
- Google Analytics Opt-Out: <https://tools.google.com/dlpage/gaoptout>

You can also opt-out from email communication by following the opt-out instructions included in emails sent to you by the University.

Security

The University implements appropriate technical and organizational security measures to protect your information when you transmit it to us that ensure a level of security appropriate to the risks presented by the processing and the nature of the data to be protected, and when we store it on our information technology systems. While we strive to protect your information, we cannot ensure or warrant the security of such information.

Retention and Destruction of Your Information

Your information will be retained by the University in accordance with its Information Technology Policies and the applicable retention periods in the Record Retention Schedule adopted by the State of New Jersey, Department of the Treasury, Division of Revenue and Enterprise Services – Record Management Services that is applicable to 4 Year Colleges and Universities. Your information will be destroyed upon your request or after the expiration of the applicable retention period, whichever is later. The manner of destruction shall be appropriate to preserve and ensure the confidentiality of your information given the level of sensitivity, value and criticality to the University.

Your Rights and Contact Information

Subject to all applicable laws, you have the right to request access to, a copy of, rectification, restriction in the use of, or erasure of your information. The erasure of your information shall be subject to the Record Retention Schedule adopted by the State of New Jersey, Department of the Treasury, Division of Revenue and Enterprise Services – Record Management Services that is applicable to 4 Year Colleges and Universities. You also have the right to withdraw consent to the use of your information, without affecting the lawfulness of the University's use of the information prior to receipt of your request. You may exercise these rights by contacting: **eugdpr-Web@montclair.edu**.

Information collected in the European Union will be transferred out of the European Union to the University. If you feel the University has not complied with applicable foreign laws regulating such information, you have the right to file a complaint with the appropriate supervisory authority in the European Union.

V. Procedure (as applicable)

VI. References