

# CSCU Website Privacy Notice

## Overview

---

CSCU and its Colleges and Universities, including the System Office (together “CSCU”), respect the privacy of individuals as fundamental to BOR’s mission.

CSCU is committed to protecting personal privacy and keeping personal information secure in its operations, activities, and management of information. As a public institution, CSCU must balance this commitment with other important commitments, including public accountability and open access to public records.

You should be aware that the CSCU may be required to disclose your information in response to a valid legal process, such as a search warrant, subpoena, or court order, or pursuant to the [Family Educational Rights and Privacy Act \(FERPA\) Notice and Directory Information Policy](#) or the [Connecticut Freedom of Information Act \(FOIA\)](#). Disclosures may also be necessary to protect CSCU’s legal rights or during health or safety emergencies.

## Scope

---

This Privacy Notice applies to the main CSCU website at [WWW.CT.EDU](http://WWW.CT.EDU) (“Website”) and any approved third party application or platform embedded in the Website and/or operated by CSCU System Office to conduct its operations, and explains CSCU practices concerning the collection, use and disclosure of users personally identifiable information and other information.

This Privacy Notice does not apply to information collected by: (1) CSCU outside the Website or CSCU System Office approved third party applications or platforms, (2) through any other site operated by CSCU College or University or any third party, or (3) by any third party that may link to or be accessible via the Website.

In addition to the Website, CSCU Colleges and Universities may publish sites and pages outside the scope of this Privacy Notice, and adhere to their own privacy notices. Users are encouraged to review posted privacy notices for each CSCU College or University site they visit.

## Information Automatically Collected

---

CSCU and our third-party vendors may automatically collect certain information regarding your use of the Website, such as your IP address, browser type, session information, the pages you visit, and referral websites.

This information is used to create aggregate summary statistics, which are typically used for purposes such as assessing what information is of most interest to users,

determining technical design specifications, and identifying system performance or problem areas.

User information may be shared with third-party vendors to the extent necessary to provide and improve web services or other communications to users. For example, we may use third party tools to generate reports on site usage, web traffic, user behavior, and user interests in order to optimize our website for our visitors. We may also use geographic, demographic, and interest-based reports of our website visitors to create custom audience lists.

We prohibit any third parties who receive user information for this purpose from using or sharing user information for any purpose other than providing services for the benefit of our users.

## **Cookies**

---

Cookies are small files that are stored on your computer (unless you block them). We may use cookies to understand and save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. A variety of tools are available to control the data collected by cookies, web beacons, and similar technologies. For example, internet browsers contain controls to limit how websites you visit use cookies and to withdraw your consent by clearing or blocking cookies.

## **Other Websites and Cookies**

---

The Website may contain links to other sites. We are not responsible for the privacy practices, the content, or the cookies set by such sites. Since the cookie policies of these sites change over time, you should determine their policies by visiting the privacy policy pages of these sites directly.

## **Personally Identifiable Information**

---

CSCU and our third-party vendors may collect, through online forms, personally identifiable information that can be used to identify you as an individual including, but not limited to: name, banner ID, permanent mailing address, telephone number, email address, or any other information that is linked or linkable to an individual, such as biometric, medical, educational, financial, or employment information. We may also collect other information as described in this Privacy Notice.

## **What Do We Use Your Personally Identifiable Information For?**

---

CSCU may process personally identifiable information for a number of reasons, including, but not limited to, create or meet contractual obligations, legitimately conduct its business operations, or to comply with applicable law. Sometimes, consent will be required for processing your personally identifiable information. In these cases, CSCU will ask for your consent to process your personally identifiable information and to share that information with third parties. The processing of personally identifiable information provided to CSCU by you or from authorized third parties, for example your high school, another higher education institution, or a national testing service, enables CSCU to identify you; engage in processing an application or other submission to CSCU; or verify information already provided to CSCU.

CSCU may use the personally identifiable information we gather from you to respond to your inquiries and fulfill your requests, when you contact us via one of our online contact forms or otherwise, for example, when you send us questions, suggestions, compliments or complaints, or when you request other information.

We may use the information we gather from you when you subscribe through our Website for various program and service updates and notifications.

We may use the information we gather from you for systems administration purposes, abuse prevention, optimization, performance tracking, and analytics, and for other purposes described in this Privacy Notice.

We may provide your information to third parties in circumstances where we believe that doing so is necessary or appropriate to satisfy any applicable law, regulation, legal process or governmental request; detect, prevent or otherwise address fraud, security, or technical issues; or protect our rights and safety and the rights and safety of our users or others.

We do not share, sell, swap, rent or otherwise disclose or authorize any third party to use your personally identifiable information for commercial purposes without your permission.

## **How Can You Opt Out?**

---

Where participating in a service or receiving communications is optional, you can choose whether you wish to receive promotional emails, SMS messages or telephone calls from CSCU, but in some cases, your ability to access or control your personally identifiable information will be limited, as required or permitted by applicable law.

If you want to access the personally identifiable information processed by CSCU that is not available directly through the consent and preference management tools provided within the CSCU communication or service, contact us at [CSCU-DataPrivacy@ct.edu](mailto:CSCU-DataPrivacy@ct.edu).

## Information Protection

---

CSCU uses risk-assessed administrative, technical, and physical security measures to protect your personal information. There are reasonable security measures in place to help protect against the loss, misuse, and alteration of the information under our control. Your data will be stored in a secure operating environment that is not accessible without authorization. CSCU cannot guarantee the security of information on or transmitted via the internet as no method of transmission over the Internet or method of electronic storage is one hundred percent secure.

## Users Located in the European Economic Area

---

If you are located in the European Union, Iceland, Liechtenstein or Norway (the "European Economic Area"), please click [here](#) for additional information about your rights under the European Union General Data Protection Regulation ("GDPR").

CSCU follows the following GDPR principles in order to protect your privacy:

- We do not collect any more personal information about you than is necessary;
- We only use your personal information for the purposes we specify in this Privacy Notice, unless you agree otherwise; and
- Other than as we specify in this Privacy Notice, we do not share your personal information with third parties.

## Access to, Change of or Deletion of Your Personal Information

---

You have the right to access the personal information that is maintained about you by CSCU. To the extent such rights are provided to you by applicable law, if you would like to request to review, correct, update, suppress, restrict or delete your personal information that you have previously provided to us, object to the processing of personal information or if you would like to request to receive an electronic copy of your personal information, please contact CSCU at [CSCU-DataPrivacy@ct.edu](mailto:CSCU-DataPrivacy@ct.edu). We will respond to your request consistent with applicable law.

## How Long CSCU Keeps Your Personal Information

---

CSCU retains personal information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the services to you, for example, for as long as you have an account with us or keep using our services;
- Whether there is a legal obligation to which we are subject, for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them; or
- Whether retention is advisable in light of our legal position such as in regard to applicable statutes of limitations, litigation or regulatory investigations.

## **Children**

---

This site is not directed to children under the age of thirteen, does not sell products or services intended for purchase by children, and does not knowingly collect or store any personal information, even in aggregate, about children under the age of thirteen.

## **Changes to this Privacy Notice**

---

This Privacy Notice may be amended from time to time. Any such changes will be posted on this page.

## **Contact Information**

---

If you have questions or concerns about this Privacy Notice, please contact us at [CSCU-DataPrivacy@ct.edu](mailto:CSCU-DataPrivacy@ct.edu) and provide a brief description of your inquiry.

## **Effective Date**

---

The effective date of this Privacy Notice is October 1, 2020.