



# UNIVERSITY of Western States

## Privacy Policy and Practices

Effective November 12, 2018

This privacy policy explains how information about you is collected, used, and disclosed when you interact online with University of Western States (“UWS”). This policy applies to the UWS websites, emails we send, as well as the information we collect when you interact with us through social media or other websites and online services (our “Services”). This policy does not cover the offline collection, processing, storage, and use of information by the departments and offices of UWS through other means. It does not apply to non-UWS websites and mobile applications that may link to the Services or be linked to or from the Services; please review the privacy policies on those websites and applications directly to understand their privacy practices.

An additional notice is provided disclosing information about our [privacy practices for alumni data](#).

For questions about our privacy practices, contact us at:

University of Western States  
2900 NE 132<sup>nd</sup> Avenue  
Portland, Oregon 97230  
503-256-3180  
[privacy@uws.edu](mailto:privacy@uws.edu)

### **Information We Collect:**

Some of the Services may include features or services that permit you to enter contact information and other information about you (“Information You Give Us”). When you interact with the Services, certain information about your use of our Services is automatically collected (“Information We Collect Automatically”). Much of this information is collected through cookies, web beacons, and other tracking technologies, as well as through your web browser or device. Any or all of activities with regard to collecting usage information may be performed on our behalf by third-parties (see the Cookies section below).

Your browser or device may include “Do Not Track” functionality. At this time, UWS does not respond to browser “Do Not Track” signals.

### **Information You Give Us**

We collect and store any information you enter on our Services. This includes:

- Your contact details including name, address, email address and phone number
- Biographical information consisting of your name, title, birth date, age, and gender
- Your experience, interests, and preferences
- Records of communications sent to you by UWS or received from you
- Payment card details

The most common ways in which we may collect your personal information include:

- When you request a brochure, register to create an application, or request a tour
- When you make a payment transaction, such as making a donation or purchasing a continuing education course via our website
- When you sign up to receive e-mail newsletters from us
- When you register for an account on a site (e.g. Ultipro for job applicants)
- When you participate in portals associated with our distance learning programs
- When you participate in surveys, panels, or research
- When you register for or participate in programs, activities, initiatives, and events
- When you request information or assistance
- In conjunction with processing your application for admission or employment
- When you participate with social media accounts involving our programs
- When you participate in communities, chat rooms, and other interactive services
- In conjunction with any verification of your account information
- When you communicate with us through a Site
- In conjunction with any other place on the Site where you knowingly volunteer personal information.

When you interact with any UWS page or account on a social media platform, we may also collect the personal information that you make available to us on that page or through that account.

### **Information We Collect Automatically**

The usage information we collect when you interact with the Services includes:

- Details of your visits to our site and information generated in the course of the use our website (including the timing, frequency and pattern of service use) including, but not limited to, traffic data, location data, blogs and other communication data, the resources that you access, and how you reached our site.
- Details regarding the device you use to access our website or digital services, including where available your IP address, operating system and browser type.
- Information about how you interact with our ads and newsletters, including whether you open or click links in any correspondence.

When you interact with any UWS page or account on a social media platform, we collect certain information that your settings make available, such as your username, account ID, or “handle.”

### **How We Use and Share Your Information**

We use the information we collect to:

- Provide information about our institution and send you related information, including confirmations, brochures, academic notices, updates, security alerts and support and administrative messages.
- Communicate with you about our classes and achievements.
- Provide you with distance learning education opportunities, including registration for these programs, instruction, and administration.
- Respond to comments, questions, or requests for information.
- Provide you with the best possible educational experience and grow our institution, including understanding our base of potential students, creating custom advertising on

social media sites, understanding the effectiveness of our marketing, and monitoring the performance and operation of the website.

- Detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.

We may share your information with the following third-parties:

- Service Providers: We rely on third-parties to assist with the operation of our website and with the Services offered on the website generally. The service providers we may share data with include payment processors, marketing automation partners, website, software, or data storage companies, and analytics and search engine providers that assist us in the improvement and optimization of our site.
- Third-parties Involved in Advertising: We share data with third-parties who assist us in serving advertising regarding UWS when you leave the Services.
- Social Media: We may share information with social media sites when you request to use the social media interactivity features on our site. Further, your interaction with these programs typically allows the third party to collect some information about you through cookies they place on your device and other tracking mechanisms. In some cases, the third party may recognize you through its cookies even when you do not interact with their application. Please visit the third parties' respective privacy policies to better understand their data collection practices and controls they make available to you.

#### **Additional Important Information about our Data Collection and Sharing Practices**

We may create analyses using aggregated, de-identified data and share these analyses at our discretion, including with marketing agencies, media agencies and analytics providers. These third parties will not be able to relate this data to identifiable individuals.

We may combine information from the Services together and with other information we obtain from our business records or from third party sources. We also may use or combine information that we collect from the Services with information provided by third parties, including demographic information and other attributes, and organizational affiliations.

We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this policy.

We may use or disclose information about you if required to do so by law or on the good-faith believe that such sharing is necessary to (a) conform to applicable law or comply with legal process served on us or our Services; (b) protect and defend our rights or property, the Services, or our users; or (c) act to protect the personal safety of our employees and agents, other users of the Services, or members of the public.

If you use our Services outside of the United States, you understand that we may collect, process, and store your personal information in the United States and other countries. The laws in the U.S. regarding personal information may be different from the laws of your state or country. Any such transfers will comply with safeguards as required by relevant law. By using

the Services, you consent to the collection, international transfer, storage, and processing of your data.

### **How We Secure the Information We Collect From or About You**

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your personal information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

### **Your Options**

Most web browsers automatically accept cookies but, if you prefer, you can usually modify your browser setting to disable or reject cookies. If you delete your cookies or if you set your browser to decline cookies, some features of the Services may not be available, work, or work as designed.

You may be able to opt out of or block tracking by interacting directly with the third-parties who conduct tracking through our Services. Please see below for more information.

You can learn more about ad serving companies and the options available to limit their collection and use of your information by visiting the websites for the [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), and the [European Interactive Digital Advertising Initiative](#). Similarly, you can learn about your options to opt-out of mobile app tracking by certain advertising networks through your device settings and by resetting the advertiser ID on your Apple or Android device.

Please note that opting-out of advertising networks services does not mean that you will not receive advertising while using our Services or on other websites, nor will it prevent the receipt of interest-based advertising from third parties that do not participate in these programs. It will, however, exclude you from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms. If you delete your cookies, you may also delete your opt-out preferences.

### **Information for Individuals Located in the EEA and Switzerland**

Purposes of processing and legal basis for processing	We process personal data on the following legal bases: (1) with your consent; (2) as necessary to perform our agreement to provide Services; and (3) as necessary for our legitimate interests in providing the Services where those interests do not override your fundamental rights and freedom related to data privacy.
Right to lodge a complaint	Users that reside in the EEA or Switzerland have the right to lodge a complaint about our data collection and processing actions with the supervisory authority concerned. Contact details for data protection authorities are available <a href="#">here</a> .
Transfers	Personal information we collect may be transferred to, and stored and processed in, the United States or any other country in which we or our affiliates or subcontractors maintain facilities, as described above.
Individual Rights	If you are a resident of the EEA or Switzerland, you are entitled to certain rights. Please note: In order to verify your identity, we may require you to provide us with personal information prior to accessing any records containing information about you.

	<ul style="list-style-type: none"> <li>• to request from us access to personal information held about you</li> <li>• to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;</li> <li>• to ask for data to be erased if the data is no longer necessary for the purpose for which it was collected, you withdraw consent and no other legal basis for processing exists, or you believe your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.</li> <li>• to restrict or object to our processing if we are processing your data based on legitimate interests or the performance of a task in the public interest as an exercise of official authority (including profiling); using your data for direct marketing (including profiling); or processing your data for purposes of scientific or historical research and statistics.</li> </ul>
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### **Additional Information About Third Party Cookies**

UWS relies on partners to provide many features of our sites and services using data about your use of the UWS and other sites. We use cookies for the following purposes:

- **Site Operations**: Enabling features that are necessary for providing you the services on our site, such as [identifying you as being signed in, tracking content views so that we can pay the content owners, remembering your preferences, and the number of times you have been shown an advertisement].
- **Analytics**: Allowing us to understand how our services are being used, track site performance and make improvements.
- **Personalized Advertising**: Delivering tailored advertising based on your preferences or interests across services and devices and measuring the effectiveness of ads.
- **Social Media**: Enabling the sharing of content from our services through social networking and other sites.

Below is a list of these partners with links to more information their use of your data and how to exercise your options regarding tracking.

<b>Category</b>	<b>Partner</b>	<b>Further Information</b>
Analytics	Google	<a href="#">How Google users information from sites or apps that use our services</a>
Personalized Advertising, Social Media	Facebook	<a href="#">Data Policy</a>
Personalized Advertising	Linked In	<a href="#">Privacy Policy</a>
Analytics	Pardot	<a href="#">Salesforce Privacy Statement</a>
Analytics	Hotjar	<a href="#">Privacy Policy</a> <a href="#">Opt-Out/Do Not Track</a>

### **Changes to This Policy**

We may make changes to this policy from time to time. We will post any changes, and such changes will become effective when they are posted. Your continued use of our Services following the posting of any changes will mean you accept those changes.