



## *Administrative Policy*

<b>Policy Title:</b>	Privacy Statement		
<b>Policy Category:</b>	Operational Ethics, Legal & Compliance Information Technology		
<b>Related Procedure(s)/ Guideline(s):</b>	Gramm-Leach-Bliley Act and Privacy of Consumer Financial Information Rule, Federal Register 15 C.F.R. Part 313 (May 24, 2020)		
<b>Policy Owner:</b>	Chief Student Services Officer		
<b>Date Approved:</b>	9/19/23		
<b>Review Dates:</b>		<b>Revision Dates:</b>	
<b>Policy Scope:</b>	Students Other Stakeholders		
<b>Policy Statement:</b>	<p>Southwest Wisconsin Technical College (Southwest Tech) is committed to protecting the privacy of students, website visitors, and other personal information. This statement complies with the Consumer Financial Information Rule of the Gramm-Leach-Bliley Act and Privacy of Consumer Financial Information Rule in the Federal Register 16 C.F.R. Part 313 (May 24, 2020) in providing a privacy statement to customers. This privacy statement applies to information collected on any of Southwest Tech's websites.</p> <p>Southwest Tech utilizes several public websites to support campus operations. The College's intention is to respect the user's privacy regarding any personal or non-personal information collected while visiting the college-owned websites.</p> <p><b>INFORMATION COLLECTED:</b></p> <p><b>Non-Personal Information</b> The following information about visits from IP addresses are automatically collected and temporarily stored in the college's server access logs and tracking cookies.</p> <ul style="list-style-type: none"> <li>• Date and time of visit</li> <li>• Pages visited</li> <li>• Operating system, browsers used, and screen resolution</li> <li>• Search terms used</li> <li>• Originating website</li> </ul>		

- Internet service provider

This information may be used for statistical purposes and to improve the usefulness of the site(s) to visitors. No additional information is collected unless otherwise stated. By using the websites listed above, users consent to the collection of this data in the manner and for the purpose described above.

### **Personal Information**

Southwest Tech does not collect information that is personally identifiable unless the user provides it (such as name and email address) for future communications from the College. Users may opt out of receiving future emails and electronic communications. Students and other stakeholders may request information, register for classes or events, make payment, sign-up to receive email newsletters or catalogs, or donate to the Southwest Tech Foundation. The types of personal information collected may include:

- Name
- Address
- Social Security Number
- Date of Birth
- Email Address
- Phone Number
- Credit Card Information (this information is not stored by Southwest Tech)

Southwest Tech does not require users to provide personal information to visit the website. However, the user may choose to provide personal information through an email message, live chat, information request form, registration form, survey, alumni membership form, etc. This information is used only to fulfill the purpose authorized by the user or in support of college-sponsored programs.

### **USES OF STUDENTS' AND OTHER STAKEHOLDERS' PERSONAL AND NON-PERSONAL INFORMATION:**

Southwest Wisconsin Technical College uses the information provided by students and other stakeholders only to complete the request for which it was intended. Southwest Tech does not disclose, give, sell, or transfer any personal information to third parties except as required by law. As a public institution, the College is required to make available public records

pursuant to Wisconsin Open Records Law (1982). Students and other stakeholders' social security number, date of birth, credit card information, and student ID are never shared with the public.

According to the Family Educational Rights & Privacy Act (FERPA), Southwest Tech may disclose, without consent, "directory" information of students in public records requests. Southwest Tech has designated the following as directory information:

- Student Name
- Address
- SWTC Email Address
- Photographs
- Program of Study
- Enrollment Status (full- or part-time)
- Dates of Attendance
- Degrees and Awards Received
- Dates of Degrees
- Participation in Officially Recognized Activities

Students are provided the opportunity to opt out of having the directory information released publicly. Students may opt out by completing a [Student Directory Privacy Request Form](#).

Delinquent student accounts at Southwest Tech may be turned over to a third-party collection agency. In that case, the student's name, birth date, and social security number is released to the third-party collection agency for total amount due and/or the Wisconsin Department of Revenue to make a claim for the total amount due against refunds, overpayments and lottery payments owed to you by the Wisconsin Department of Revenue or Department of Administration.

### **Third-Party Tracking**

Third-party vendors, including advertising networks and web traffic analysis services, may use cookies on the College's websites to collect non-personal data. Google Analytics helps website administrators track site usage, understand how users find sites, and improve website function and content. For more information on Google Analytics please visit [Google's website](#).

Other third-party tools show Southwest Tech advertisements on sites across the web. Using cookies and related technologies, these tools show ads to people who've previously visited our websites, might be interested in our sites based on other sites they've visited or be a web user in a specific geographic area.

### **Pixel Tags**

Pixel tags, also called web beacons, may be used on Southwest Tech's website, email messages, or newsletters. Pixel tags allow the college to monitor the actions of users opening a particular webpage, email, or newsletter to customize our offerings to you. They also help us determine number of page visits or email opens to help improve user experience and site content.

### **Other Websites**

Southwest Tech's websites may contain links to other sites. Southwest Tech is not responsible for the privacy practices or the content of such websites. These links are provided only for the convenience of our visitors.

### **COMMITMENT TO DATA SECURITY:**

To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, Southwest Tech has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information collected online and by any other means.

Any activity on Southwest Tech Information Technology Services (ITS) resources may be monitored, logged and reviewed by college-approved personnel or may be discovered in legal proceedings or in response to public records requests. Generally, the content of user accounts will be treated as private and not examined or disclosed except:

- as required for system maintenance or business necessity, including security measures;
- when there exists reason to believe an individual is violating the law or Southwest Tech policy;
- to meet the requirements of the Wisconsin Public Records Law or other laws; regulations; or institutional policies, rules, or guidelines.

Southwest Tech has the right to employ appropriate security measures, to investigate as needed, and to take necessary actions to protect the College ITS resources. Southwest Tech

	<p>may also have a duty to provide information relevant to ongoing investigations by law enforcement.</p> <p>Southwest Tech operates an Identity Theft Prevention Program designed to identify relevant red flags for covered accounts, detect red flags in connection with opening of Covered Accounts and existing Covered Accounts, respond appropriately to any detected red flags including the reasonable mitigation of identity theft, and ensure the program is updated periodically to reflect changes in risks to students and to the safety and soundness of Southwest Tech.</p> <p>Southwest Tech works with authorized users (employees) to protect their privacy interests, as well as those of the College. Authorized users must not violate the privacy of the records and information entrusted to them.</p>
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