

# Privacy Statement for Baldwin Wallace University [bw.edu](http://bw.edu) websites

Baldwin Wallace University (BW) is committed to protecting the privacy of website visitors as well as the privacy of our students, parents, legal guardians, faculty, staff, alumni and friends. This privacy statement describes the type of information that may be collected from visitors to BW's websites and is updated as necessary to reflect current collection methods and usage of website visitor information.

## Information Sharing

BW does not sell or rent website visitor information and does not share website visitor information except as compelled by law.

BW also complies with the Family Educational Rights and Privacy Act (FERPA), which prohibits the release of education records except in limited circumstances (i.e., with the student's permission, to parents of dependent students and in response to a valid court order). Although FERPA regulations apply only to students, BW is equally committed to protecting the privacy of all visitors to its websites. BW also complies with the applicable provisions of the Gramm-Leach-Bliley Act (GLBA) and the Health Insurance Portability and Accountability Act (HIPAA).

## What information is collected?

### *Anonymous information*

BW may collect and store website visitor information such as referrer pages, date/time stamps, pages requested, browser and computer information, user agent, headers, files downloaded and any errors encountered.

### *Personal information*

Baldwin Wallace acknowledges that there are many potential definitions of "personal information." BW's definitions of "Personally Identifiable Information", "Confidential Information", and "Baldwin Wallace University Information" can be found in Data Classification Policy ITP-BW-04 at <http://bw.edu/ITPolicies>.

## How is information collected?

BW may use a variety of methods including, but not limited to, network, server and browser technologies to collect website visitor information. Some examples:

- Cookies: [https://en.wikipedia.org/wiki/HTTP\\_cookie](https://en.wikipedia.org/wiki/HTTP_cookie)
- Scripts: [https://en.wikipedia.org/wiki/HTML\\_scripting](https://en.wikipedia.org/wiki/HTML_scripting)
- Server logs: [https://en.wikipedia.org/wiki/Server\\_log](https://en.wikipedia.org/wiki/Server_log)
- Custom URL parameters: [https://en.wikipedia.org/wiki/Query\\_string](https://en.wikipedia.org/wiki/Query_string)
- Tracking images: [https://en.wikipedia.org/wiki/Web\\_beacon](https://en.wikipedia.org/wiki/Web_beacon)

- Information and correspondence submitted voluntarily by website visitors via forms, comments, chats, etc.
- Phone advertising ID.

### **Why is information collected?**

BW collects website visitor information to best serve audiences by optimizing and personalizing visitor experiences in both digital and physical spaces, to manage visitor relationships with the University, to foster/promote further communications, to gauge communication effectiveness, to gain insights into user behavior and preferences, to track interests, to identify errors and issues, recruitment, and to conduct market research.

### **Is collected information secure?**

The security of all data is very important to BW. For data collected from website visitors, BW follows the guidance prescribed in the University's IT policies: xxxxxxxxxxxxxxxxxxxxxxxxxxxx – (TBD)

### **How long is information stored?**

BW only retains personal data for the duration necessary to fulfill the purposes for which it was collected. Personal data may also be retained for longer periods if it is solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes. When defining the appropriate retention length, BW adheres to relevant legal requirements, such as regulations and basic requirements listed in HIPAA, FERPA or other state or federal regulations.

### **Third Parties**

BW may contract or partner with external third parties to place ads on BW websites not affiliated with the University. These non-affiliated sites may send and share visitor information and browsing behavior, collected in accordance with their own privacy policies, with BW. These third-party websites may also display advertisements to previous visitors of a BW website.

### **Children/Minors**

BW does not knowingly collect website visitor information from children or minors as defined by the Children's Online Privacy Protection Act (COPPA). The Federal Trade Commission provides guides for protecting the privacy of children visiting websites at <https://www.consumer.ftc.gov/topics/protecting-kids-online>.

### **Opting Out**

BW respects the privacy decisions of its constituents. Website visitors may choose not to have data collected by BW websites through a variety of ways:

- Most modern web browsers provide a user privacy setting. When enabled, the browser tells websites to disable their information collection methods. For more information, visit [https://en.wikipedia.org/wiki/Do\\_Not\\_Track](https://en.wikipedia.org/wiki/Do_Not_Track).

- Responsible internet advertisers have tools to opt-out or control advertisements and tracking, such as:
  - <http://www.networkadvertising.org/choices/>
  - <https://choice.microsoft.com/>
  - <https://support.google.com/ads/answer/2662922?hl=en>
  - <https://www.facebook.com/help/769828729705201/>

### **Questions**

Please email [info@bw.edu](mailto:info@bw.edu) with any questions about this privacy statement.