



**Privacy Policy**

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**1. Introduction**

Eton University is committed to protecting the privacy of individuals who interact with any aspect of its business and will handle personal information in accordance with the Delaware Online Privacy and Protection Act (DOPPA), The Family Educational Rights and Privacy Act of 1974 (FERPA) and by any other applicable U.S. federal laws. In providing products and services, the University will be transparent about how and why information is collected and used.

**2. Definitions**

Personally identifiable information ("PII") -any personally identifiable information about a user of a commercial Internet website, online or cloud computing service, online application, or mobile application that is collected online by the operator of that commercial Internet website, online service, online application, or mobile application from that user and maintained by the operator in an accessible form, including a first and last name, a physical address, an e-mail address, a telephone number, a Social Security number, or any other identifier that permits the physical or online contacting of the user, and any other information concerning the user collected by the operator of the commercial Internet website, online service, online application, or mobile application from the user and maintained in personally identifiable form in combination with any identifier described in this paragraph.

Non-Personally Identifiable Information ("Non-PII"): Information that cannot identify an individual person, such as IP address, browser types, operating systems, domain names, access dates and times, referring website addresses, online transactions and browsing and search activity.

Market or advertise- making a communication or arranging for a communication to be made, in exchange for compensation, about a product or service the primary purpose of which is to encourage recipients of the communication to purchase or use the product or service.

Advertising or marketing service- a person who provides, creates, plans, or handles marketing or advertising for another person.



User-an individual that uses an Internet website, online or cloud computing service, online application, or mobile application

"Web beacons"- objects that are embedded in a web page or e-mail and are usually invisible to the user but are used to track a web user's navigation of a website or collection of websites or pages, interaction with an e-mail, use of mobile applications, the completion of transactions, submittal of applications and browsing behavior.

"Child" or "children"- 1 or more individuals who are under the age of 18.

### **3. Scope**

This Privacy Policy applies to both electronic and manual collection, storage, use and disclosure of personal information by Eton University. It also sets out information about how the University may give access to personal information. Neither the website, nor Eton University online activities or services for our clients, are directed toward or intended for children. We do not collect PII from any person of whom we have actual knowledge is under the age of 18.

### **4. Collection**

#### **4.1. Purpose of collecting and holding personal information**

Eton University collects and holds personal information for the purpose of offering and providing educational products and services and requests information to manage and administer those products and services. When the University collects personal information about individuals who are not current students or the University graduates, the University generally does so for the purposes for which the information was provided. All appropriate personal information will be held by the University to satisfy record-keeping obligations.

##### **4.1.1. Use and disclosure of personal information**

The University uses and discloses personal information for the purposes disclosed at the time of collection, or otherwise as set out in this Policy. Personal information will not be used or disclosed for any other purposes, unless consent has been given or the University is authorized or required to do so by law.

Personal information will generally only be used or disclosed as follows:

- To provide the products, services or information requested from the University (including enrolment, assessment and issuing certificates of completion).
- Personal information may also be disclosed to third parties (where applicable) to assist the University with functions such as marketing and recruitment of students,
- To register and administer events or promotions
- To verify personal information details upon request from third parties, such as completion of courses, a request from a potential employer verifying a qualification and further enrolment into another institution
- To comply with the University's legal and regulatory obligations,
- To assist the University to make its sites, service and products more accessible and valuable to students
- To perform various administrative or management functions including administering billing and debt recovery; training of staff and contractors and managing their work performance and career progression, quality assurance and evaluation; maintenance and testing of information technology systems; obtaining advice from consultants and professional advisers; management of legal liabilities and claims (including liaising with legal representatives and insurers).
- To the extent that the University is required to report data breaches to relevant government entities. These breaches occur:
  - when there is unauthorized access, disclosure or loss of personal information
  - when the breach is likely to result in serious harm (to one or more affected individuals), and
  - when preventing the risk of serious harm through remedial action is unsuccessful.

## 4.2 Students

When enrolling into a course of study, Eton University will collect personal information such as name, address, contact details, date of birth, citizenship, educational history and prior academic results, and work history (if required as a basis of admission). Additional information may be collected during a course of study and dealings with the University.

The University may collect other personal information which may identify racial or ethnic origins (including proficiency in languages other than English), information about health or disability (where this is relevant to accommodating specific needs) and membership of professional or industry associations (where required as a basis of admission or for credit transfer/recognition of prior learning).

The University may collect government related identifiers, such as ID number or a passport number, which may be necessary to verify a person's identity, to confirm eligibility for



enrolment. The University may collect personal information because it is required to do so by laws.

The University may collect personal information from other educational institutions where is necessary to verify qualifications and course credits for enrolment and assessment purposes:

- from organizations where a work integrated learning placement, internship or practical component is completed as part of Eton University course
- from an employer if a course of study is being supported or incorporated into employment
- from education agents
- from other educational institutions and organizations that work with the University to recruit students into courses of study
- from other educational institutions or organizations that work in partnership or affiliation with the University to provide, promote, accredit or recognize courses of study
- from third parties for the purpose of direct marketing of services.

Communications with the University may be monitored (including emails, telephone) for security and dispute resolution purposes, where it is lawful to do so.

#### **4.3. Employees, contractors and staff**

The University also collects and holds personal information of staff members for the purpose of meeting the business needs of the University, or for a directly related purpose, including establishing, managing or terminating an employment relationship with the University, for audit and compliance purposes as well as emergency situations whereby personal information may be required for the safety of the staff member.

When making an enquiry about or applying for a position with Eton University, the following information may be collected: name, home address, educational and work history and contact details (including telephone and personal email address).

Information may be collected from third parties such as referees. When providing contact details of referees, consent is being given to the University to collect personal information from the named referees.

When the University is proposing to offer an employment position, additional personal information may be collected, such as date of birth, tax file number, emergency contact details, bank account, visa, passport, qualification information, awards, publications, copies of transcripts and details relating to working with children and police checks. For unsuccessful candidates, resumés may be maintained on file for future opportunities, only when a candidate has provided permission to do so.



During employment with the University other personal information may be collected, including records of work performance, medical certificates, nationality, membership of a professional or industry association.

#### **4.4. Visitors to Eton University websites**

This notice applies to all information collected by or submitted to official Eton University websites. The following information explains the Internet privacy policy and practices that the University has adopted for its official websites. This notice should not be construed as a contractual promise, and the University reserves the right to amend it at any time.

When you access Eton University Web pages, the client information and the essential and nonessential technical information ("Non-PII") listed below is automatically collected. No other information is collected through our official website except "optional information" sent to us by email or online forms.

##### **4.4.1. Automatically collected Non-PII**

- Client information: the Internet domain and Internet address of the computer the user is using.
- Essential technical information: identification of the page or service requested, type of browser and operating system used and the date and time of access.
- Nonessential technical information: the Internet address of the website from which the user linked directly to our website and the "cookie information" described below.

The Non-PII collected is used for marketing purposes; it enables Eton University to determine which advertisements perform well, allows to more effectively match ads, mobile application and website content to user's interests, assists us in improving the operation of our services, helps us to maintain the quality of our services, enhances our services to our business partners and clients and enables us to provide general statistics to our business partners and clients regarding use of Eton University services.

##### **4.4.2 Optional information- PII**

- Personal Data: when the user send us an email we may collect the email address, name and the content of the email.
- Form Data: when the user completes online forms, all the data chosen to fill in or confirm, including credit or debit card information if the user is making a payment



#### **4.4.3. Use of Personally Identifiable Information**

Eton University uses the information gathered from users for systems administration purposes, abuse prevention, and to track user trends, and for the other purposes described in this policy. If the user sends an email to Eton University, the email address provided may be used to send information, respond to inquiries, and/or other requests or questions.

#### **4.4.4. Third parties access to Personally Identifiable Information**

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, Eton University might use third parties such as Google Analytics to generate reports on site usage, web traffic, user behavior, and user interests in order to optimize the website for its visitors. Eton University also uses geographic, demographic, and interest-based reports of our website visitors to create custom audience lists.

Advertising or advertisement serving partners may monitor unidentifiable statistics relating to website access and usage. The University uses and discloses the unidentifiable information collected through the use of cookies and measurement tools in accordance with this Privacy Policy. This includes using the information to report statistics, analyze trends, diagnose problems and improve the quality of the University's products and services. Eton University prohibits 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.

Eton University may also provide your information to third parties in circumstances where it is believed 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 Eton University rights and safety and the rights and safety of other users.

Finally, Eton University never uses or shares the personally identifiable information provided to us online in ways unrelated to the ones described above without clear notice and the opportunity to opt-out or otherwise prohibit such uses.

#### **4.4.5. Use of cookies**

Cookies are small files that are stored on user's web-enabled devices and are using to improve user's experience when seeing web and mobile advertisements. Eton University may use cookies to save user's preferences for future visits, estimate the total reach of an advertising campaign, as well as frequency of display, and to serve advertisements which are relevant to



users and compile aggregate data about site traffic and site interaction to provide better or more relevant services and information.

#### 4.4.6. Disabling cookies

If an individual does not want information collected through the use of cookies and/or measurement tools, they may be able to delete or reject cookies and/or some of the measurement software features through their individual browser, the settings section of their mobile or tablet device, or through tools like the [Network Advertising Initiative opt-out page](#). Disabling these features may cause some of the functions on University websites to work less effectively.

#### 4.4.7. External Websites and Cookies

The University provides links to external websites, as well as to third party websites that allow interaction and sharing of content including social media buttons such as Facebook share or Twitter. These linked sites, applications and widgets are not under the University's control and the University does not accept responsibility for the conduct of companies linked to the University's websites, or their collection of information through these third-party applications or widgets. Before disclosing information on any other website or using these applications or widgets users are advised to examine the terms and conditions of using that website and the relevant third party's data collection practices and privacy policy.

The University may provide email addresses and/or phone numbers collected by the University to digital services, including social media platforms and search engines, for the purpose of reaching audiences via those services to promote the University and its services. If you do not want such information provided to the University to be used for this purpose, please email [education@eton-university.us](mailto:education@eton-university.us) with that instruction and include your name and the relevant email address.

Additionally, third parties may use cookies, web beacons, and similar technologies to collect or receive information from your website and elsewhere on the internet and use that information to provide measurement services and target ads. Facebook users can opt-out of the collection and use of information for ad targeting using the following links: <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu/>.

Note: The Internet is not always a secure method of transmitting information. While the University takes reasonable steps to ensure all information it receives is maintained securely, the University cannot ensure that communications conducted via the Internet will be secure.

#### **4.4.8. Providing information is a choice**

There is no legal requirement for users to provide any information at Eton University website. However, our website will not work without routing information and the essential technical information. Failure of user's browser to provide nonessential technical information will not prevent the use of our website but may prevent certain features from working. For any optional information that is requested at the website, failure to provide the requested information will mean that the particular feature or service associated with that part of the Web page may not be available to the user.

#### **4.4.9. Users Located in the European Economic Area**

If you are located in the European Union, Iceland, Liechtenstein or Norway (the "European Economic Area"), please read the additional GDPR Privacy Policy for information about ways that Eton University Centers, units and controlled entities, including Eton University website, may collect, use, and share information about its users.

### **5. Security of Information**

The University collects and holds personal information in paper-based and electronic records and systems. Personal information may be collected in paper-based documents and converted to electronic form for storage (with the paper-based document either being archived or securely destroyed).

The University uses physical security, password protection and other measures to ensure that all personal information is protected from misuse, interference and loss; and from unauthorized access, modification and disclosure.

### **6. Marketing**

Eton University uses and discloses the personal information it collects for marketing purposes. Marketing may include providing individuals with information regarding products, services, events and new developments, as well as collecting marketing feedback (e.g., marketing surveys). The University provides a facility for individuals to reflect consent to receive University marketing communications. Individuals may request not to receive direct marketing communications or opt-out through either of the following means:

- by contacting the University, or
- by clicking the 'unsubscribe' link at the bottom of any email communications received from the University.





NOTE: Despite the above:

- The University will still contact individual students in respect of:
  - ongoing business and operational matters, for example: invoices, student and graduate surveys, and information relevant to their course of study.
  - transactional and responsive emails, which include requests made through 'contact us' and 'enquiry forms' on the University websites.
- Requesting not to receive marketing communications and opting out will not unsubscribe individuals from receiving other University communications for which they provided their personal information for other purposes separately.

## **7. Disclosure of information to overseas recipients**

The University may also disclose personal information to other educational institutions to facilitate international study or for recognition of prior learning.

## **8. Access and Correction of Personal Information**

For current and former students, enquiries regarding personal information (such as confirming current contact details or confirming results) can be requested by emailing [education@eton-university.us](mailto:education@eton-university.us).

The University endeavors to keep all personal information accurate, up-to-date and complete; however, if information held by the University is considered to be inaccurate, out-of-date, incomplete, irrelevant or misleading, a request should be made for a correction of the information.

Eton University gives its applicants and registered students the ability to edit their student registration account information (<http://eton.fedena.com>) and their learning management software account at any time by logging into their accounts. However, students are strongly encouraged to notify the University of any changes made to their name, address, primary contact email and telephone number as stated in University Enrollment and Attendance Policy, chapter 5.1.



## 9. Complaints

Students may lodge a complaint under the [Student Complaints Policy](#) for actions undertaken under the Privacy Policy and related procedures while staff may do so under the relevant grievance policy.

## 10. Changes to privacy policy

This Privacy Policy may be amended from time to time. Any such changes will result in this document being updated. Eton University will inform all its users and students of those changes by posting them on the website, sending them an email or other notification and the 'last updated date' will be clearly stated at the beginning of the Policy to indicate when those changes were made and when they came into effect.