

Marywood University

Policies and Procedures

California Privacy Notice Policy

Policy Statement: Privacy Notice - California Residents

This Privacy Notice for California Residents (“Notice”) supplements the information contained in the Website Privacy Policy (found [here](#)) of Marywood University (“Marywood”), and applies solely to faculty, students, visitors, users and others who reside in the State of California (“visitors”). This Notice sets out how Marywood handles any personal information visitors may provide through the use of the [Marywood.edu](#) website, including the Marywood Alumni Portal at [alumni2.marywood.edu](#) and any other online services available on or through the marywood.edu domain name (“Site”), whenever visitors interact with Marywood through social media, by phone, in writing, in person or through any other interactions with Marywood (collectively with the Site, the “Services”). This Notice is provided as required by the California Consumer Privacy Act of 2018 (“CCPA”) and other applicable California privacy laws.

This Notice explains how Marywood collects, uses, shares and stores personal information and other data when visitors use the Services, and how visitors can exercise certain rights they have in connection with their privacy and personal information. Any personal information that Marywood collects will be treated as set forth in this Notice.

This Notice is effective as of: December 15, 2020.

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Scope of this Notice

This Notice covers only the Services identified above and is only applicable to residents of California. This Notice does not apply to visitors, users and others who provide information through the Services but do not reside in California, and this Notice does not apply to information which visitors may send Marywood by other means. Other websites, locations, products or services, whether online or offline, may have their own specific privacy policies or notices which apply instead of this Notice, and visitors should consult those accordingly.

The Site may contain links to external websites and other online locations, including those embedded in third-party advertisements or sponsor information, that are not controlled by Marywood. Marywood is not responsible for the privacy practices and data collection policies for any third-party services. Visitors should consult the privacy policies or notices of those third-party services for details about how they handle personal information.

Changes to this Notice

Marywood reserves the right to make changes to this Notice at any time. Since this Notice may change over time as Marywood modifies or expands its Services, visitors should check back from time to time to understand how Marywood treats information it collects. This Notice's effective date will always be set forth at the beginning and end of the Notice. Any changes will be immediately incorporated into this Notice, and will be prospective only. Marywood will not make any changes that have retroactive effect unless legally required to do so.

Any change to this Notice is effective immediately. Any continued use of the Services after changes are made to this Notice constitutes acceptance of the changes. If any changes are deemed unacceptable, visitors should cease all use of the Services.

Information Marywood May Collect

Personal information ("Personal Information") is generally defined as information that, alone or in combination with other information, could identify, relate to, describe, reference, be reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. The information Marywood collects includes certain kinds of Personal Information. Categories of Personal Information can include, but are not limited to, name, mailing/billing address(es), telephone number, email address, username and password, IP address or other device information, browsing or search history, credit/debit card number or other financial information, non-public education information, professional or employment-related information, office address and other business information, demographic information, visitor preferences, biometric information such as fingerprints, precise location information, or any other type of information that, directly or indirectly, is reasonably capable of being associated with an identifiable person.

When using the Services, the Personal Information Marywood may collect includes **contact information** such as name, address, email address, phone number, and alias, preferred name or social media handle.

In connection with Services related to employment and enrollment, Marywood may collect **characteristic information** that could include certain Personal Information, such as signature, height, weight and/or information about other physical attributes.

To access parts of the Services, visitors may need to provide Marywood with **account information**, such as a username and password. In some instances, an email address also may be considered account information if it is used to log in to an account.

If visitors submit an employment or student application, Marywood may collect **employment information** including, but not limited to, employment history.

For certain Services, Marywood may request that visitors furnish Personal Information including **payment information**, such as a credit or debit card number, bank account number or other financial or payment account information.

Any **education information** Marywood collects that is reasonably capable of identifying an individual and that is private and confidential or not otherwise publicly available is governed by Marywood's Family Educational Rights and Privacy Policy (based on FERPA - available at <http://www.marywood.edu/registrar/ferpa.html>) and applicable federal and state laws. Responses to questions regarding race, sex, sexual orientation, gender identity, color, national or ethnic origin, age, creed, ancestry, religion, disability, or any other legally protected status are voluntary, are kept confidential, and are not used to deny access for admission, employment, and/or Services. They are, however, used to assist Marywood in providing data to demonstrate compliance with federal regulations.

Identification numbers such as Social Security numbers, passport numbers and driver's license numbers and related government identification data may be requested on applications for admission and employment purposes. They are used for identification when required for certain matters, e.g., those relating to federal and state financial aid, employment background checks, and tax reporting. Access to social security numbers is restricted only to staff members who need them to provide services.

Certain Services offered through Marywood may collect **medical information**, such as health insurance information and data about any medical conditions including disabilities, mental health issues or learning disorders. Any medical information provided for purposes of employment or healthcare benefits is protected in accordance with the Health Insurance Portability and Accountability Act (HIPAA) and applicable confidentiality agreements.

Marywood also may collect other **demographic information** such as age, gender, race, ethnicity, national origin, citizenship, religion, marital status and/or status as a veteran of the U.S. military.

There are other aspects of the Services that may collect data from visitors in an automated manner, and such automatically collected data could include some Personal Information. For example, when someone visits the Site, Marywood may automatically collect certain information about their computer, browser or device, including potential Personal Information and other data about their web browser, such as their IP address, time zone, and some of the cookie identifiers that are installed on any applicable device. Additionally, whenever someone browses the Site, Marywood collects information about the individual web pages or products that are viewed, what websites or search terms referred the visitor to the Site, and information about how the visitor interacted with the Site. To the extent such automatically collected data is reasonably capable of identifying visitors as Personal Information, this Notice refers to such data as **device information**.

Marywood may collect device information using technologies such as cookies, which are data files that are placed on a device or computer and often include an anonymous unique identifier. For more information about cookies, and how cookies may be disabled, visit <http://www.allaboutcookies.org>.

How Marywood Gathers Information

Marywood may collect Personal Information when visitors apply for enrollment or employment, create an account for the Services, visit certain areas of the Site or other Services, submit questions or comments, subscribe to any communications from Marywood, or when visitors otherwise voluntarily provide it to Marywood in any interaction visitors may have with Marywood. Marywood may gather any voluntarily provided Personal Information and other data through third-party software applications that Marywood uses through its own servers or on hosted servers. Such applications include software that Marywood uses to: manage its organizational and workflow processes; track progress in its strategic planning; host chat, virtual events and other online communication services; administer admissions, career services and food services; provide student services such as counseling and psychology; track behavioral issues and reported instances of fraud, abuse or other misconduct; and to maintain Marywood's study abroad database. Marywood manages these applications directly, and no Personal Information is shared with the providers of these third-party applications when visitors use them.

Other data, such as device information which may include Personal Information to the extent such data are reasonably capable of identifying visitors, could be collected in an automated manner whenever visitors use the Services. For example, when visitors access or use the Services, Marywood and third parties may provide certain functionality through the Services, such as web content management tools and interactivity with third-party social media or advertising networks, which may engage, receive, collect, and store certain online identifiers through automatic data collection tools including cookies, pixel tags, web beacons, embedded web links, and similar technology. These technologies may collect information including, but not limited to, visitors' IP address, browser type, the date and time that visitors use the Services, number of clicks, and information about the mobile devices they use.

Marywood may also receive information from third-party college search and student recruitment service providers visitors interact with outside of the Services.

By using the Services, all visitors agree that Marywood may gather and retain data, including Personal Information, related to Marywood's provision of the Services.

How Marywood Uses Information

Depending on the nature of any interaction with Marywood, Marywood may use collected Personal Information and other data to:

- process applications for enrollment or employment;
- administer and secure visitor accounts;
- maintain proper educational records, organizational records and other relevant records;

- respond to questions, comments or other messages;
- send Marywood newsletters or other updates with information or advertising relating to the Services;
- process payment information related to visitors’ use of the Services or purchase of any Marywood products;
- perform evaluations and surveys regarding visitor experiences with the Services;
- conduct research so Marywood can improve how it communicates the benefits of Marywood’s Services;
- contact visitors if there are issues with information or content they provided through the Services;
- provide ongoing technical support related to the Site and other Services;
- communicate with visitors regarding additional uses of their Personal Information beyond the scope of this list and this Notice;
- deliver products ordered through the Services;
- improve the content and general administration of the Services;
- perform internal operations related to the Services (e.g., fraud prevention);
- troubleshoot software issues and operational problems with the Services;
- conduct data analysis and testing; and/or
- monitor usage of the Services.

Processing by Service Providers

Except as noted herein, Marywood does not share or sell Personal Information it collects with any person or entity outside of Marywood.

The Site and certain other Services may use Google Analytics and Google Tag Manager, which are web analytics services that use cookies to analyze how visitors use online aspects of the Services. The information collected by these cookies about visitors’ use of the Services (including any IP address) is transmitted to and stored on a Google server in the United States. Google uses this information to assess how the Site is used and other applicable online Services, providing reports on data such as how often a page is visited, what pages are viewed, and what other websites are visited prior to visiting the Site, for example. Google may transfer this information to third parties, if required by law or if third parties process the information on behalf of Google. View an overview of Google’s data privacy practices for Google Analytics at <https://support.google.com/analytics/answer/6004245>. For more information on Google’s privacy practices generally, please review Google’s privacy policy at <https://policies.google.com/privacy>. To opt-out of being tracked by Google Analytics, visitors may be able to download and install the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout>. These Google services may also cause visitors to receive personalized ads based on their browsing behavior. Visitors may be able to opt-out of receiving these personalized ads by using the settings at <https://adssettings.google.com/>.

Some Services also may use a pixel tag provided by Facebook, which could automatically collect certain data about how visitors use online aspects of the Services in a manner similar to cookies. As a result, visitors may receive ads that are personalized from what visitors appear to be interested in based on their online behavior, both through the Services and elsewhere. To learn more about how Facebook handles information it collects from California residents, including Personal Information, please visit <https://www.facebook.com/legal/policy/ccpa>. Visitors may be able to opt-out of certain

targeted advertising that Facebook provides by following the instructions at <https://www.facebook.com/settings/?tab=ads>.

Marywood may disclose certain portions of visitors' Personal Information to service providers or third parties as necessary to fulfill the anticipated purposes for which the applicable visitor provided the Personal Information.

Marywood may share any information, including Personal Information, that Marywood receives with vendors and service providers retained as necessary to fulfill the purposes for which visitors provided such information in connection with the Services. For example, Marywood may provide contact information such as name, address, email address or phone number to shipping/mail, marketing and email service providers to send products, newsletters, and other materials visitors order or request. Marywood may provide contact information to market research providers, survey processors and student recruitment services so Marywood can improve and more effectively communicate the benefits of the Services. If visitors request a copy of their transcript, their contact information and education information will be shared with the National Student Clearinghouse to respond to their transcript request. Contact information and payment information also may be shared with banks that receive direct deposit payroll files and other payment processors.

Marywood may share certain device information that is automatically collected whenever visitors use the Site with its provider of web hosting services.

If any customers, employees or members of Marywood's Alumni Association choose to apply for or purchase insurance-related products or services through the Alumni Association's third-party insurance service provider, certain Personal Information will be collected directly by the service provider. Marywood does not collect any insurance-related information through this process. Please review the applicable privacy policy of any insurance providers before using them to understand how they handle Personal Information.

The Services may allow visitors to share information, including Personal Information, with third-party services and social networking websites, such as Facebook. Marywood does not share Personal Information with these social media providers unless visitors direct the Services to do so. Their use of the information will be governed by their privacy policies, and visitors may be able to modify their privacy settings on these entities. Please consult these third parties' privacy policies before using their platforms.

Marywood may also disclose Personal Information to other service providers and for other purposes with visitor permission, or for one or more of the following purposes:

- To carry out Marywood's obligations and enforce Marywood's rights arising from any contracts related to their use of the Services, including for billing and collections;
- As necessary or appropriate to protect Marywood's rights, property or safety, Marywood's students, faculty, employees, visitors or others;
- To respond to law enforcement requests and as required by applicable law, subpoena, court order, other legal process or governmental regulations;
- As otherwise described to visitors at or before the point when Personal Information is collected; or
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or to transfer some or all of Marywood's assets, whether as a

going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Marywood is among the assets transferred.

By providing to Marywood the Personal Information and other data referenced above, visitors agree that Marywood may use and share such Personal Information and other data in accordance with the terms of this Notice. Marywood will not collect additional categories of Personal Information or use collected Personal Information for materially different, unrelated, or incompatible purposes without providing visitors notice and obtaining their consent to the new processing activities. If visitors do not opt-in, information will continue to be used in a manner that is consistent with the version of this Notice under which it was collected, or the information will be deleted.

Marywood does not knowingly sell the Personal Information of minors under 16 years of age.

Rights and Choices

The following rights may be available to California residents with regard to Marywood's collection, use and sharing of Personal Information on or through the Services:

- The right to request details about what Personal Information Marywood collects, uses, discloses or sells about visitors;
- The right to request the deletion of Personal Information Marywood collected or maintains about visitors;
- If applicable, the right to opt-out of any sale of their Personal Information; and
- The right not to receive discriminatory treatment by Marywood, in terms of the services, products and prices offered on or through Marywood's Services, because an applicable visitor exercised these rights regarding the collection, use and sharing of Personal Information.

If visitors would like to request the ability to access, review, edit, delete or have Marywood properly dispose of any of the Personal Information that Marywood collected about them, if visitors would like to opt-out of receiving further information from Marywood, or limit what Marywood shares, or if visitors otherwise wish Marywood to cease using their Personal Information in the manners specified in this Notice (subject to any applicable legal exceptions), visitors can do so by emailing Marywood at optout@marywood.edu or by calling Marywood at 1-800-338-4207 (toll-free).

Visitors may be able to opt-out of Marywood sharing their Personal Information with the entities identified in this Notice by contacting Marywood using the information above, unless the sharing of the applicable Personal Information is necessary to perform one of the following business purposes: to count ad impressions and evaluate their effectiveness; to detect, protect against, and prosecute security incidents; to debug or troubleshoot functional errors that may arise with the Services; to complete short-term tasks related to an existing interaction the visitor has with Marywood; to maintain or service an account; to process payments and fulfill orders or other authorized transactions; to verify customer or visitor information; and to ensure the safety and quality of the Services.

Any removal of content by Marywood does not ensure or guarantee complete or comprehensive removal in all places. The content may have been shared or reposted by other

parties, or federal or state law may require maintenance of the content or information. Marywood will do its best to accommodate requests, but Marywood cannot guarantee it can remove all Personal Information from the specified uses. Therefore, please be as specific as possible in any request. If the request relates to information that Marywood needs to make certain Services function properly, those Services may not function properly moving forward. Marywood may deny a deletion request if retaining the information is necessary for Marywood or its service providers to:

1. Complete the transaction for which Marywood collected the Personal Information, provide a requested good or service, take actions reasonably anticipated within the context of Marywood's ongoing business relationship with a visitor, or otherwise to perform Marywood's contractual obligations;
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
3. Debug products to identify and repair errors that impair existing intended functionality;
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546);
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if visitors previously provided informed consent;
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on an existing relationship with Marywood;
8. Comply with a legal obligation; or
9. Make other internal and lawful uses of that information that are compatible with the context in which visitors provided it.

Marywood reserves the right to maintain proper records as required by law, or for otherwise legitimate business purposes to the extent permitted by law, even if such records contain Personal Information.

Visitors may grant an authorized agent written permission to submit requests regarding their Personal Information, but Marywood may deny authorized agent requests absent proof the applicable visitor authorized such agent to act on the visitor's behalf, or if Marywood is unable to verify the applicable visitor's identity.

Marywood is required to verify the identity of any person or entity that requests the disclosure or deletion of Personal Information. If a visitor has a password-protected account with Marywood, Marywood will use existing authentication procedures to verify the visitor's identity. For most other requests, Marywood will ask visitors to provide information that matches at least two pieces of Personal Information Marywood stores about visitors before responding to their request. If visitors would like to request the specific pieces of their Personal Information that Marywood has collected, or if visitors would like Marywood to delete highly sensitive information, visitors will need to match at least three pieces of information Marywood stores about them, and must provide a signed declaration under penalty of perjury that the applicable visitor is the individual whose Personal Information is being requested.

Marywood cannot respond to requests or provide visitors with Personal Information if Marywood cannot verify the requestor's identity or authority to make the request and confirm the Personal Information relates to the visitor at issue. Making a verifiable consumer request does not require visitors to create an account with Marywood. Marywood will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

If visitors would like to opt out of receiving promotional emails from Marywood, please follow the opt-out instructions at the bottom of the email or send Marywood a detailed email at optout@marywood.edu.

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of Personal Information the business shares with third parties for those third parties' direct marketing purposes and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To exercise rights under this law, visitors may make one request each year by sending an email to optout@marywood.edu.

Some browsers have a "do not track" feature that lets visitors tell websites that they do not want to have their online activities tracked. Marywood does not sell Personal Information under California law, and because there is no common understanding about what a "do not track" signal is supposed to mean, Marywood does not process these requests. To learn more about other ways to possibly opt-out of certain kinds of targeted advertising, visit the [Network Advertising Initiative website](#) and the [Digital Advertising Alliance website](#). Options selected through these links to third-party services are browser- and device-specific, and there is no guarantee these industry-provided opt-out tools will prevent all targeted advertising.

Securing Personal Information

The Site implements, uses and maintains industry standard technological security measures that are reasonably designed to help protect Personal Information from loss, unauthorized access or disclosure, both in storage and in transmission. Transport Layer Security (TLS) or Secure Sockets Layer (SSL) encryption is used to help prevent unauthorized access to Personal Information transmitted on or through the Site.

Marywood takes the issue of protecting Personal Information seriously, but visitors should exercise discretion in what information visitors disclose and/or transmit through the Services. Marywood cannot guarantee that information sent over the Internet is fully secure. The transmitted information may be intercepted by others before it reaches Marywood. If visitors are concerned about sending information to Marywood over the Internet, please send the information by mail or call Marywood to make other arrangements. Marywood is not responsible for the security of information sent over the Internet.

Marywood retains collected information for a reasonable amount of time in order to fulfill the stated purpose for why the information was collected. Marywood also retain collected information connected to business records for periods of time required by law. If Marywood

determines that collected information is no longer needed, it will delete such information. Marywood's collection times will be consistent with applicable law.

Children's Privacy

The Site is not directed at, marketed to, nor intended for, individuals under 13 years of age. No one under the age of 13 is permitted to provide any information on or through the Site or other online Services. If visitors are under 13 years of age, DO NOT: use or provide any information on or through the Site; use any of the Site's features; use any interactive or public commenting feature on the Site; and/or provide any identifiable information online to Marywood. Marywood does not and will not knowingly collect any information, including Personal Information, from any person under 13 years of age and Marywood will take prompt steps to delete any such information if it is inadvertently received. If Marywood learns that it has received Personal Information from any person under 13 years of age, Marywood will delete that information. If visitors believe Marywood might have information from or about any person under 13 years of age, such visitors should contact Marywood immediately at optout@marywood.edu.

Contact Information

Visitors with questions about this Notice, the Services, or other interactions with Marywood can use the following contact information:

EMAIL: optout@marywood.edu
PHONE: 1-800-338-4207
MAIL: 2300 Adams Avenue, Scranton, PA 18509

Marywood intends to strictly enforce this Notice. If it appears there has been some violation of this Notice, please inform Marywood.

This Notice was last updated on December 15, 2020.

History:

12/15/2020 – Establishment of the California Privacy Notice Policy as recommended by the Cabinet and approved by the President of the University on 12/15/2020.

Related Policies:

Committee responsible for oversight of this policy proposal:

- Policy Committee of the University
- Employee Benefits Committee
- Academic Council

Manual and/or Handbook/Section:

This policy has been entered into the following section(s) of the Policies and Procedures Manual and other applicable handbooks as noted.

Policies and Procedures Manual

(You may select more than one section.)

- Board of Trustees
- University-Wide
- Presidential Area
- Academic Affairs
- Business Affairs
- Student Life
- University Advancement
- Administrative Services
- Not a University Policy

Faculty Handbook

(You may select more than one section.)

- 1 – Organization and Governance
- 2 – Faculty Policies
- 3 – Academic Policies and Procedures
- 4 – Administrative and Financial Policies and Procedures
- 5 – Student Life Information
- 6 – University Advancement Information
- Does not appear in the Faculty Handbook

Personnel Handbook

(You may select more than one section.)

- 1 – Organization and Governance
- 2 – Recruitment and Hiring
- 3 – Employment Policies and Practices
- 4 – Compensation and Salary Administration
- 5 – Employee Benefits and Programs
- 6 – Employee Training
- 7 – Employee Health and Safety
- 8 – Other Pertinent Information
- Does not appear in the Personnel Handbook

Student Handbook

- Yes
- No

Board of Trustees Handbook

Yes

No

**MARYWOOD UNIVERSITY
POLICIES AND PROCEDURES**

**Mary Theresa Gardier Paterson, Esquire
Secretary of the University and General Counsel**