



## University of the People Privacy Policy

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Last reviewed date:	February 04, 2016
Owner:	General Counsel
Summary:	This policy governs the collection of personally identifiable information through the University of the People website.

### Policy Statement

UNIVERSITY OF THE PEOPLE IS COMMITTED TO PROTECTING YOUR PRIVACY IN ACCORDANCE WITH THIS PRIVACY POLICY, WHICH APPLIES TO THE UNIVERSITY OF THE PEOPLE WEBSITE, ITS RELATED WEBSITES, AND TO ANY SERVICES AND CONTENT THEREIN ("WEBSITE"), AND GOVERNS COLLECTION OF PERSONALLY IDENTIFIABLE INFORMATION THROUGH THE WEBSITE.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY USING THE WEBSITE, YOU GIVE YOUR CONSENT TO UNIVERSITY OF THE PEOPLE'S DATA PRACTICES AND UNDERSTAND THAT ALL PERSONALLY IDENTIFIABLE INFORMATION THAT YOU SUBMIT MAY BE PROCESSED BY UNIVERSITY OF THE PEOPLE IN THE MANNER AND FOR THE PURPOSES DESCRIBED HEREIN.

IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS SET FORTH HEREIN, DO NOT USE THE WEBSITE.

### Collection of Personal Information

If you wish to apply for admission to University of the People ("UoPeople", or the "University"), the UoPeople website ("Website") offers you the opportunity to submit personally identifiable information. "Personally identifiable information" refers to data that allows University of the People to identify you, such as your name, gender, mailing address, telephone number, date and country of birth, government-issued identification number, e-mail address, and other personal information.

If you submit personally identifiable information through any of UoPeople's Communications Services (as described in the University's [Terms of Use](#)), that information may be collected and used in accordance with this Privacy Policy.

### Use of Personal Information

By submitting your personally identifiable information to the Website, you understand and agree that UoPeople may collect, use, transfer, and disclose your personally identifiable information as described in this Privacy Policy. Such use may involve transfer of personally



identifiable information to servers located outside the country from which you access the Website.

You acknowledge that the University may transfer your personally identifiable information from one geographical area to another located anywhere in the world, as the University may deem reasonably necessary or appropriate for its administrative purposes. If you are a resident of the European Economic Area, you agree that the University may transfer your personally identifiable information outside of the European Economic Area, including to the University's affiliated institutions or third-party service providers. You consent to any such transfers as a condition of your communications with, application to and/or enrollment with the University.

If you subscribe to our newsletter, we may also use your information to inform you of new services UoPeople will be providing, inform you of scholarship applications and academic programs provided by third parties, and send you requested information and promotional materials for marketing purposes and research.

#### **Collection and Use of Non-Personal Information**

The University also automatically collects non-personal information about your computer hardware and software for the purpose of improving the administration and content of the Website, facilitating use of the University's Website by its users, and to properly diagnose server problems and other issues.

The University may contract with third party providers to assist in better understanding visitors to the Website. Third party providers are prohibited from using any information they collect on behalf of UoPeople for any purpose other than helping the University conduct and improve its services to you.

#### **Information Sharing**

The University does not sell, rent or lease your personally identifiable information to third parties. Personally identifiable information collected in connection with applications for admission is, however, collected by a third-party service provider that hosts the Website, and that information is released to application reviewers who may include University employees, contractors, volunteers and other parties. These individuals are prohibited from using your personally identifiable information except in connection with UoPeople services and any other products and/or services you have requested, and they are required to maintain the confidentiality of your information.

The Website will disclose your personally identifiable information, without notice, if: (i) required to do so by law, (ii) the University becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, or (iii) in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on the University; (b) protect or defend the rights, system, network or property of the University; (c)



protect the personal safety of users of the Website, or the public; or (d) prevent a crime or protect national security.

The University requires opt-in consent (meaning, your express permission) for the sharing of any sensitive personally identifiable information, such as medical information or information concerning race or ethnicity, political or religious beliefs, and sexuality.

### **Security of your Personal Information**

The University maintains reasonable measures to protect your personally identifiable information from unauthorized access, use or disclosure. The University stores the personally identifiable information you provide on computer servers in a controlled environment that has implemented protections against unauthorized access, use or disclosure. UoPeople has implemented procedures to safeguard the integrity of its information technology assets, including, but not limited to, authentication, monitoring, auditing, and encryption. These security procedures have been integrated into the design, implementation, and day-to-day operations of the Website as part of University's continuing commitment to the security of electronic content as well as the electronic transmission of information.

For website security purposes and to maintain the availability of the Website for all users, the University employs software to monitor traffic and identify unauthorized attempts to upload or change information or otherwise damage the Website. When personally identifiable information (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

The University, however, cannot guarantee that unauthorized third parties will never be able to defeat the measures described in this section or use your personally identifiable information for improper purposes. Nothing in this Privacy Policy or in the University's [Terms of Use](#) shall be deemed a guarantee, contract, or warranty of any kind, whether express or implied, regarding the security of your personally identifiable information.

### **Educational Records**

The Family Educational Rights and Privacy Act (FERPA) of 1974 was designed to protect the privacy of educational records, establish the rights of students to inspect and review their educational records, and provide guidelines for the correction of inaccurate or misleading information through informal and formal hearings. While FERPA does not apply to the University, since it is not a federally-funded institution, the University nonetheless strives to meet FERPA's provisions to the extent reasonably feasible.

The University will not disclose a student's educational record without obtaining the student's prior written consent, except in certain instances where a student's educational record may be



disclosed (i) to other school officials, including teachers with a legitimate educational interest and contractors, consultants, volunteers, or other parties to whom UoPeople has outsourced institutional services or functions; (ii) to parents of a dependent student, as defined in section 152 of the Internal Revenue Code of 1986; (iii) to accrediting organizations; (iv) in compliance with a judicial order or lawfully issued subpoena ; or (v) for any other reason permitted under 34 CFR § 99.31.

The University depends on the accuracy of the records submitted by its students. False information on an application, or any other act to intentionally mislead or misinform instructional personnel or administrators, is grounds for disciplinary action, including dismissal from the University. Students seeking access or amendment of their educational records should contact the Office of Student Services at [Student.Services@uopeople.edu](mailto:Student.Services@uopeople.edu).

### **Updating your Data**

Upon receipt of your written request and sufficient data to permit the University to identify your personal information, the University will make reasonable efforts to disclose to you the information it holds about you. UoPeople will also make reasonable efforts to correct, amend or delete any personal information that is inaccurate and notify any third party recipients of the necessary changes. UoPeople may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.

### **Children's Online Privacy Protection Act**

Although neither this website nor any of the University's services are intended for children under 13 years of age, the University complies with the Children's Online Privacy Protection Act of 1998 ("COPPA") and does not knowingly collect any personal information online from children under the age of 13.

### **Use of Cookies**

The UoPeople Website may use "cookies" to help you personalize your online experience. A cookie is a small data file that is placed on your hard disk by a web page server. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you personalize Website pages, or apply for admission to UoPeople, a cookie helps the University recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as your name and mailing address. When you return to the Website, the information you previously provided can be retrieved, so you can more easily use the UoPeople features.



Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. ☒ One of the primary purposes of cookies is to provide a convenience feature to save you time.

By using the Website, its related websites and other services, you hereby agree to the use of cookies as described herein. Note that most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Website.

### **Google Analytics**

The University uses Google Analytics to collect information about use of the Website. The University uses the data it receives from Google Analytics only to improve the Website, and does not combine the IP address collected by Google Analytics with your name or other identifying information that you may enter on the Website. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit our Website, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to the Website is restricted by the Google Analytics [Terms of Use](#) and the Google [Privacy Policy](#). You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser.

### **Your California Privacy Rights and Do Not Track Notices**

California Civil Code Section 1798.83 permits customers of a company who are California residents to request certain information regarding its disclosure of personally identifiable information to third parties for their direct marketing purposes. To make such a request, please send an email to [info@uopeople.edu](mailto:info@uopeople.edu). Please note that the University is only required to respond to one request per customer each year.

Note that the University does not respond to "Do Not Track" signals.

### **The Microsoft CRM**

The University's Customer Relationship Management (CRM) system is hosted by Microsoft. There is a seamless transition from the University's main website to the CRM. You enter the CRM every time you work on your application to the University or otherwise log in to the Student Portal. The CRM processes and maintains all UoPeople applications, student records such as course registration history and grades, and data related to payment history such as invoices and tracking numbers. Note that the CRM does not store any of your personal bank account or PayPal information.



Microsoft is not allowed to use your personally identifiable information other than for the provision of services to the University or as otherwise permitted by law. For more information about the Microsoft Dynamics CRM, you can review the security and privacy pages at the [Microsoft Dynamics CRM Trust Center](#) and the [Microsoft Privacy & Cookies](#) page.

### **The Moodle Learning Platform**

All of the University's courses, classroom discussions, assignments, testing, the academic advising messages system, and student and faculty forums are conducted through Moodle, an open-source learning platform. There is a seamless transition from UoPeople's main website to the University's Moodle platform.

No one outside the UoPeople community is permitted to access the UoPeople Moodle platform. However, the UoPeople Moodle site administrators have access to nearly everything in the system and certain private information is also accessible by other UoPeople students, faculty and staff:

1. *UoPeople profile page.* Every UoPeople student has a profile page in Moodle, which contains their first and last name, email address (optional), profile picture (optional) and description (optional). This information is visible to classmates for each course in which a student is enrolled, and to all students, faculty and staff through the Academic Advising Virtual Office. UoPeople profile pages are NOT available to the general public.
2. *UoPeople discussion forums.* Since UoPeople is based on the peer-learning model, the University makes great use of discussion forums in its courses. Anything posted in a discussion forum is visible to the instructor and to all students enrolled in that course. For large classes that are divided into groups, only members of your group can see your posts, which includes your full name and profile picture if you have chosen to upload it to the system.
3. *UoPeople peer-assessed assignments.* All assignments assessed by other students in a particular course are submitted anonymously. Unless you put your name on your peer-assessed assignment, which is not a requirement, only instructors and administrators will be able to see who has evaluated your assignment.
4. *Private messaging system.* Only the sender and receiver can view the content of messages sent through the Moodle privacy messaging system.

If you withdraw from the University, your account will be disabled and will no longer be visible to students and instructors. Old and inactive accounts are usually deleted after four years of nonuse.



Note that if you choose to create a public profile on the moodle.org or moodle.net sites, which are outside the UoPeople Moodle platform, your information may become public and the [Moodle Privacy Policy](#) shall apply.

### **The UoPeople Yammer Enterprise Network**

UoPeople's Yammer Enterprise Network provides a collaborative environment for UoPeople students, faculty, alumni, staff and volunteers from throughout the globe ("UoPeople Community") to connect and share meaningful information. Note that there is a seamless transition from UoPeople's main website to the University's Yammer Network.

By enrolling in UoPeople's Yammer Network, you understand and agree that your personal profile and any content you post will be visible to other members of the UoPeople Community and to anyone outside the community who manages to log in to the UoPeople Yammer Network. Confidential student information and other sensitive or private content should not be posted on the Yammer Network.

Although UoPeople administrators monitor all posts and comments to the UoPeople Yammer Network, you are ultimately responsible for the content you post and UoPeople has a right and obligation to report any user who posts illegal content and threats of violence to the authorities.

Prior to enrollment in the UoPeople Yammer Enterprise Network, users should review Microsoft's [Yammer Privacy Statement](#) and UoPeople's Yammer Terms of Use.

### **Third Party Websites, Cookies and Privacy Policies**

Certain pages of the Website may contain links to websites that are not controlled by the University. Third-party cookies may be set by websites such as Facebook, Twitter, YouTube, Google Plus and other social media outlets for which UoPeople may implement plugins.

Third-party cookies are not governed by this Privacy Policy. The University does not control and is not responsible for the privacy policies or other content on websites other than the Website, including websites linked to from the Website, or for the use of personally identifiable information that you may submit to any of those websites. The University encourages you to review the privacy policies of those third-party websites directly so that you can understand how those websites collect, use and share your information.

### **Changes to this Policy**

This Privacy Policy may be updated from time to time. Modifications will be denoted by the "updated" notice at the top of this page. Your submission of personally identifiable information to the Website following the posting of any changes to this Privacy Policy constitutes acceptance of those changes. The University encourages you to periodically review this Privacy



Policy to be informed of its policies respecting your personally identifiable information. By continuing to access the Website after notice of modifications have been published, you signify your agreement to be bound by the updated terms.

**Compliance with this Policy**

The University regularly reviews its compliance with this Privacy Policy. If you have any questions regarding this Privacy Policy, or believe that the University has not adhered to any of its terms, please contact the University at [support@uopeople.edu](mailto:support@uopeople.edu). ☒☒