

Subject:
BRTC Data Privacy Policy

Policy Number:
2182

Date Adopted: 5/19

Revised:

Black River Technical College ("College") is committed to ensuring the privacy of confidential information, accuracy of personal data, and compliance with international, federal, and state laws and regulations concerning the use of personal information. Other than as required or permitted by law, personally identifiable information is not shared. Regardless of how the information was collected, the College does not sell personally identifiable information and it does not re-distribute personally identifiable information for any non-College purpose.

Information Collected

The College collects and processes personally identifiable information from individuals only as necessary in the exercise of the College's legitimate mission, interests, functions, and responsibilities as a private, non-profit institution of higher education. The majority of personally identifiable information comes from the following:

- students,
- members of students' families,
- employees,
- alumni,
- friends, and
- people who apply to be students or employees.

Use of Collected Information

Students or Student Applicants:

Personally identifiable information collected from students or student applicants is used in the following manner:

- to register or enroll persons in the College,
- manage student accounts,
- provide academic advising,

- develop and deliver education programs,
- track academic progress
- analyze and improve education programs, recruitment, retention, regulatory reporting, auditing, maintenance of accreditation,
- conduct general demographic and statistical research to improve College programs,
- identify appropriate support services or activities,
- provide reasonable accommodations,
- enforce College policies,
- comply with applicable laws, and/or
- other related College processes and functions.

Employees or Applicants for Employment:

The College collects and processes personally identifiable information from individuals who are employees or applicants for employment for the purpose of administering various employment benefits and functions.

Other Individuals:

The College also collects and processes personally identifiable information from alumni, donors, parents, and friends of the College to advance the College's mission.

Third Party Sharing:

Personally identifiable information may be shared by the College with third parties who have entered into contracts to perform functions on behalf of the College, but only when the third parties agree to protect personally identifiable information and prevent unauthorized disclosure.

Distribution of Collected Information

The College will not disclose personally identifiable information, without consent, except for certain explicit circumstances in which disclosure is permitted or required by law. Additionally, the College will not sell personally identifiable information to third party organizations for any non-College purpose.

Who Receives/Processes Individuals' personally identifiable information?

College Personnel:

An individual's personally identifiable information may be processed by College trustees and employees, including faculty, financial aid counselors, human resources professionals, law enforcement officers, and others, as may be necessary to carry out the purposes for processing the information and the activities of the College.

College-Related Organizations:

the College may share an individual's personally identifiable information with College Related Organizations, such as the College Alumni and the College Foundation.

Third parties:

The College may share an individual's personally identifiable information with third parties such as

- educational platform providers and course partners to further the purposes for processing the information and the activities of the College;
- partner institutions to facilitate study abroad activities; and
- vendors to provide services related to an individual's affiliation with the College (e.g., assist with or arrange housing) and to improve College outreach efforts.

Anonymized Data

Please note that the College may provide anonymized data developed from personally identifiable information to third parties, such as government entities and research collaborators, and that such anonymized data is outside the scope of this notice.

Third Party Use of Personally Identifiable Information

The College may disclose personally identifiable information and other information as follows:

- **Consent:** We may disclose information if we have an individual's consent to do so.
- **Emergency Circumstances:** We may share information when necessary to protect health and safety interests, even if an individual is physically or legally incapable of providing consent.

- **Employment:** We may share information when necessary for administering employment or social security benefits in accordance with applicable law, subject to the imposition of appropriate safeguards to prevent unauthorized disclosure.
- **Public Information:** We may share information if the information already has been made public.
- **Archiving:** We may share information for archival purposes in the public interest, and for historical research and statistical purposes.
- **Performance of a Contract:** We may share information when necessary to comply with a contractual obligation.
- **Legal Obligation:** We may share information when the disclosure is required or permitted by international, federal, or state laws and regulations. The College will comply with lawfully-issued subpoenas.
- **Service Providers:** We use third parties who have entered into a contract with the College to support the administration of College operations. In such cases, we share information with such third parties subject to the imposition of appropriate safeguards to prevent unauthorized disclosure.
- **College-Affiliated Individuals, Programs, and Services:** We may share information with individuals and other third parties that are affiliated with the College for the purpose of contacting individuals about goods, services, charitable giving or experiences that may be of interest to them. This information is made available on the condition that it is used only for the purposes for which it was shared, is kept confidential, and is safeguarded from unauthorized disclosure.
- **De-Identified and Aggregate Information:** We may use and disclose information in de-identified or aggregate form without limitation.

BRTC Website

To enhance and personalize an individual's experience, some BRTC webpages use cookies. Cookies are text files placed upon one's computer hard drive to store an individual's preferences. However, the College does not store personally identifiable information within the cookie. Some BRTC services may not work properly if cookies are disabled.

External Websites

Some hyperlinks may link to third party websites. Third party websites are not controlled by the College and are not subject to this Privacy Policy. Check the privacy policies of the third party websites to see how an individual's personal information will be collected and used.

Existence of Automated Individual Decision-Making

The College Foundation may use a form of automated decision-making to help identify prospective supporters of the College and its activities. The logic takes a broad approach to assessing a possible donor's propensity to support the College and may result in a prospective donor being contacted to explore support opportunities.

Individuals will not be subject to a decision of this type which produces legal effects concerning them or similarly significantly affects them unless the decision is necessary for entering into or performing a contract or unless the individual explicitly consents.

How Long Does the College Keep personally identifiable information?

The College retains personally identifiable information in accordance with applicable law.

Right of Access

You have the right to request that the College confirm whether it is processing an individual's personally identifiable information. If the College is processing an individual's personally identifiable information, you have the right to access that personally identifiable information, and the College will provide you with a copy of that personally identifiable information unless prevented by applicable law.

Right to Correction of Inaccurate Personally Identifiable:

You have the right to request that the College correct any inaccurate personally identifiable information that it maintains about you. You also have the right to request that the College complete any incomplete personally identifiable information that it maintains about you.

Right to Erasure:

You have the right to request the erasure of personally identifiable information that the College maintains about you in certain circumstances. Subject to applicable U.S. and state law and College policies, including but not limited to this Privacy Policy, and provided that there are no overriding legitimate grounds for the College to retain the personally identifiable information, the College will comply with the

request and will take reasonable steps to inform any third parties with whom the personally identifiable information was shared.

Right to Withdraw Consent:

If the basis for processing an individual's personally identifiable information is consent, you may revoke an individual's consent at any time. Upon receipt of an individual's notice withdrawing consent, and if there are no other legal grounds for the processing, the College will stop processing the personally identifiable information unless the processing is necessary for the establishment, exercise, or defense of legal claims. Revoking consent does not affect the lawfulness of processing that occurred before the revocation.

How to Exercise an Individual's Rights:

In order to exercise any of these rights, submit an individual's request to the College

Black River Technical College
Attn: Director of Technology
P.O. Box 468
Pocahontas, AR 72455

To expedite processing an individual's request, please identify the data collection location (e.g., the website where an individual's personally identifiable information was collected), if known.

Notification of Changes

The College Privacy Policy is reviewed periodically and may be modified at the discretion of the College. Changes to the privacy policy will be incorporated and posted on the College's web site. Information will be handled according to the privacy policy in effect at the time the information is used.

Security

The College will implement appropriate technical and organizational security measures to protect personally identifiable information collected by the College, regardless of the method of collection.