

## Policy 1026

### **Purpose:**

Georgia Military College (GMC) is committed to the responsible use of personal information and sensitive information collected from and about its students, faculty, staff, business partners, and others who provide such information to the college. This commitment is in accordance with both state and federal regulations concerning the use of sensitive information. Such sensitive information includes information that could be used to cause financial harm or reputational harm to any individual. This policy applies to personally identifiable sensitive information and how it is collected.

### **Collection and Use of Information:**

GMC may collect certain information that is automatically generated when a user visits a site. We may also collect aggregate information about the use of the sites, including, but not limited to, which pages are most frequently visited, how many visitors we receive daily, and how long visitors stay on each page. A visitor may be prompted or required to provide certain personal information in order to access various features and information on the sites. Such information may include, among other things, name, address, email address, and phone number. If a visitor does not want to provide such information, he or she may choose not to access those features of the sites. Any personal information provided through the sites will be protected in accordance with the provisions of this policy.

Any information submitted via the website will only be used for the purposes stated on the submission page. GMC will not share your information with third parties except: as required by law, as necessary to protect institutional interests in the course of an investigation, as necessary to further research efforts pursuant to approvals from the appropriate data stewards and the Institutional Review Board, and/or with contracted service providers acting on behalf of the college who have agreed to protect the confidentiality of the data.

Links within the college website may direct you to other websites that we do not control. GMC is not responsible for the privacy practices, policies, actions, web content, services or products of non-GMC State sites to which we link.

### **Cookies:**

Cookies are files that many websites transfer to users' web browsers to enable the site to deliver personalized services or to provide persistent authentication. The information contained in a cookie typically includes information collected automatically by the web server and/or information provided voluntarily by the user. Our website uses persistent cookies in conjunction with a third party technology partner to analyze search engine usage and web traffic patterns. This information is used in the aggregate to monitor and enhance our web pages. It is not used to track the usage patterns of individual users.

### **European Union General Data Protection Regulation (EU GDPR) Privacy Notice:**

GMC is an institute of higher education involved in education, research, and community engagement. In order for GMC to educate its students both in class and on-line, engage in world-class research, and provide community services, it is essential to collect data. GMC has lawful

bases to collect, process, use, and maintain data of its students, employees, applicants, research subjects, and others involved in its educational, research, and community programs. The lawful bases include, without limitation, admission, registration, delivery of classroom, on-line, and study abroad education, grades, communications, employment, applied research, development, program analysis for improvements, and records retention. Examples of data that GMC may need to collect in connection with the lawful bases are: name, email address, IP address, physical address or other location identifier, photos, as well as some sensitive personal data obtained with prior consent.

The majority of GMC's collection and processing of personal data will fall under the following categories:

1. Processing is necessary for the purposes of the legitimate interests pursued by GMC or third parties in providing education, employment, research and development, and community programs.
2. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. This lawful basis pertains primarily but not exclusively to research contracts.
3. Processing is necessary for compliance with a legal obligation to which GMC is subject.
4. The data subject has given consent to the processing of his or her personal data for one or more specific purposes.

There will be some instances where the collection and processing of personal data will be pursuant to other lawful bases.

**Review Date:** 4/15/2020

**Reviewed by:** Jeannie Zipperer, Director of Staff

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