

*Effective starting: May 25<sup>th</sup>, 2018*

## What this Privacy Policy covers

This Privacy Policy covers the information we collect about you when you use our website, or otherwise interact with us (for example, by registering for and receiving any digital e-mails and newsletters; accessing our website; requesting information about our programs; enrolling in our programs, attending our events; viewing our videos and other content; and using our mobile and digital websites and social media channels (unless a different policy is displayed.)

This policy also explains your choices about how we use information about you. Your choices include how you can modify your marketing preferences, object to certain uses of information about you and how you can access and update certain information about you.

If you do not agree with this policy, do not access or use our Products or interact with any other aspect of our business.

This policy is intended to help you understand:

- What information we collect about you
- How we use information we collect
- How we share information we collect
- How we store and secure information we collect
- How to access and control your information
- Other important privacy information

## What information we collect about you

We collect information about you when you provide it to us and when other sources provide it to us, as further described below.

### Information you provide to us

We collect information about you when you provide it to us directly.

Content you provide through our website: This includes websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking pages operated by us. For example, you provide content to us when you provide comments or feedback or when you participate in any interactive features, surveys, activities or events.

## Cookies and Other Tracking Technologies:

What types of technologies do we use?

We use cookies, web beacons and other technologies to improve and customize the website and your experience; to allow you to access and use the Products without re-entering your username or password; to understand usage of our website and the interests of our students; to determine whether an email has been opened and acted upon; and to present you with advertising relevant to your interests. For each visitor to our website, our servers may automatically attempt to identify the user through a cookie set within your browser. This is done to provide applicable access to our website. From time to time we may also track information, in aggregate, on pages and features that users access or view. The activity is collected and stored in our server's log files. We may log Internet Protocol (IP) addresses, or the location of your computer on the Internet required for systems administration and troubleshooting purposes.

How do we use them?

- Where strictly necessary. These cookies and other technologies are essential in order to enable our website to provide the feature you have requested, such as remembering you have logged in.
- For functionality. These cookies and similar technologies remember choices you make such as language or search parameters. We use these cookies to provide you with an experience more appropriate with your selections and to make your use of our website more tailored.
- For performance and analytics. These cookies and similar technologies collect information on how users interact with the website and enable us to improve how the website operates.
- Targeting Cookies or Advertising Cookies. These cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. They remember the websites you have visited and that information is shared with other parties such as advertising technology service providers and advertisers.
- Social media cookies. These cookies are used when you share information using a social media sharing button or “like” button on our websites or you link your account or engage with our content on or through a social media site. The social network and related service providers will record that you have done this. This information may be used for targeting/advertising activities.

How can you opt-out?

To opt-out of our use of cookies, you can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of our

website. We and our third-party partners also collect information using web beacons (also known as "tracking pixels").

Many browsers include their own management tools for removing local storage objects and to manage "flash cookies". You may be able to opt out of receiving personalized advertisements as described below under "Your Choices."

You will not be able to opt-out of any cookies or other technologies that are "strictly necessary" for the Products.

Information we receive from other sources

**Other Partners:** We receive information about you and your activities on and off the Products from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with, our Products and online advertisements.

How we use information we collect

**To provide the website and personalize your experience:** We use information about you to provide the website to you, including to authenticate you when you log in, provide support, and operate and maintain the website.

**To communicate with you:** We use your contact information to respond to your comments, questions and requests, provide support, and send you technical notices, updates, security alerts, and administrative messages. If an opt out is available, you will find that option within the communication itself.

**Support:** We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze crash information, and to repair and improve the website.

**For safety and security:** We use information about you and your use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Terms of Conditions of use policies.

**To protect our legitimate business interests and legal rights:** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

**With your consent:** We use information about you where you have given us consent to do so for a specific purpose not listed above.

How we share information we collect

We share information we collect about you in the ways discussed below, including in connection with possible business transfers.

#### Sharing with other users

When you use our website, our social media pages or our email communications, we share certain information about you with other users.

**For collaboration:** You can create content, which may contain information about you, for other users to see. For example, when you comment, we display your profile picture and name next to your comments so that other users with access to the page or issue understand who made the comment.

**Managed accounts:** If you submit a form on our website using an email address with a domain that is owned by your employer or organization, and such organization requests, certain information about you including your name, contact info, content and past use of your account may become accessible to that organization's administrator.

**Community Forums:** Our website may offer publicly accessible comment areas and blogs. You should be aware that any information you provide on these forums - including profile information associated with the account you use to post the information - may be read, collected, and used by any member of the public who access our website. Your posts and certain profile information may remain even after you terminate your account. We urge you to consider the sensitivity of any information you input into these forums. To request removal of your information from publicly accessible websites operated by us, please contact us as provided below. In some cases, we may not be able to remove your information, in which case we will let you know if we are unable to do so and why.

#### Sharing with third parties

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our school.

**Service Providers:** We work with third-party service providers to provide website hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.

**Our Partners:** We work with third parties who provide consulting, sales, and technical services to deliver and implement customer solutions around the Products. We may share your information with these third parties in connection with their services, such as to assist with billing and collections, to provide localized support, and to provide

customizations. We may also share information with these third parties where you have agreed to that sharing.

**Links to Third-party Sites:** The Products may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third-party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.

**Third-Party Widgets:** Some of our Products contain widgets and social media features, such as the Twitter "tweet" button. These widgets and features collect your IP address, which page you are visiting on the Products, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third-party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the company providing it.

**With your consent:** We share information about you with third parties when you give us consent or we are allowed to do so under applicable laws.

**Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:** In exceptional circumstances, we may share information about you with a third-party if we believe that sharing is reasonably necessary to (a) comply with any applicable laws, legal process or governmental request, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect Siba, our students or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

**How we store and secure information we collect**  
Information storage and security

We use data hosting service providers to host the information we collect, and we use technical measures to secure your data. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

**How to access and control your information**

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations.

**Your Choices:**

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. Below, we describe the tools and processes for making these requests.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

**Delete your information:** In some cases, you may ask us to delete accessing, storing, using and otherwise processing your information. You request by contacting admissions. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

**Request that we stop using your information:** In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your employer does not object (where applicable).

**Opt out of communications:** You may opt out of receiving communications from us by using the unsubscribe link within each email, or by contacting us as provided below to have your contact information removed from our email list or registration database.

**Send "Do Not Track" Signals:** Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked.

#### Changes to our Privacy Policy

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice. We encourage you to review our privacy policy whenever you use our website or social media pages to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using our website and social media pages and contact us at admissions if you wish to delete your account(s), as outlined above.

#### Contact Us

Your information is controlled by Stevens – The Institute of Business and Arts. If you have questions or concerns about how your information is handled, please contact admissions at [admissions@siba.edu](mailto:admissions@siba.edu).