# **Greenfield Community College Data Privacy**

The listing below are the provisions of our Privacy Policy which describe the information we collect from or about you; ways we disclose, make use of and protect that information; options you have, and how you can update your information or contact us with and questions or concerns. We hope that in reading our posted Privacy Policy you gain a clear idea of how we manage information about or directly related to you.

# **INFORMATION COLLECTED ABOUT YOU** A. Information Collected by Greenfield Community College

## 1. In General

Personally Identifiable Information (PII or "Personal Information") is information which can be used to identify, impersonate, or contact you. When you visit our Website, Greenfield Community College collects only the Personal Information you provide to us. We collect Personal Information that you provide us in two general and distinct ways:

(1) When you send a Web form or use the telephone to contact Greenfield Community College for the purpose of paying your bill, asking questions, or for any other purpose.

(2) When you choose to send Greenfield Community College an e-mail or participate in surveys. We collect non-personal information from you and about your use of our Website, emails, special promotions and newsletters that we send to you, and Websites of selected partners, sponsors and advertisers. For example, Greenfield Community College may use "cookies" on our Website to collect non-personal information about your use of our site, selected sponsors' sites, or emails we send to you. Greenfield Community College does not store any Personal Information in any cookies on your computer. All of these are described in more detail below.

### 2. Registration and Personal Information

You may use our Website without registering or submitting any Personal Information. In that case, the only information we collect will be non-personal information collected through the use of cookies. However, in order to have access to certain services and content (e.g., using the Self Service or Banner System features), you may provide certain Personal Information. We use the Personal Information that you provide to respond to questions from you and/or inform you of significant changes to this Privacy Policy or allow specific access to your information. We may also use this information to send you emails with special promotions or newsletters with content that we think may be of interest to you. You can always opt-out of receiving such emails or unsubscribe to newsletters at the time you register or at any time.

### 3. Cookies

We also collect anonymous, non-personal information about your use of our site or your use of emails, special promotions or newsletters that we send to you. For example, we collect non-personal information about your use of our site and your use of the sites of selected sponsors and advertisers through the use of "Cookies". Cookies are small computer files that we transfer to your computer's hard drive that allow us to know how often someone visits a site and the activities they conduct while on that site (such as which pages you visited and the length of time you spent on each of those pages). Every computer is assigned a different cookie by Greenfield Community College. The information collected by cookies helps us improve the content on web pages or in emails specifically designed for you and also allows us to statistically monitor how many people are using our site, or opening our emails, and for what purposes. We may use cookie information to target certain messages to your browser or to determine the popularity of certain content.

Your browser software can be set to reject all cookies. Most browsers offer instructions on how to reset the browser to reject cookies in the "Help" section of the toolbar. If you reject our cookie, certain of the functions and conveniences of our site may not work properly but you do not have to accept our cookie in order to productively use our site. While it may be possible to link non-personal cookie information to Personal Information collected in other ways, please be assured that if you accept our cookie we will not, without your consent, link the cookie information we collect to Personal Information you provide to us on our site.

### 4. E-mails and Newsletters

As noted in the discussion of cookies (see above), we collect anonymous, nonpersonal information about your use of e-mails and newsletters that we may send to you. In some cases, when you click on a link in an e-mail or newsletter, your browser may be momentarily directed to the site of a third party which, acting on Greenfield Community College's behalf (see Disclosure to Website Service and Content Contractors, below), notes or "counts" your response to the e-mail or newsletter before re-directing your browser to its proper destination; this re-direction process will not be apparent to you.

#### **B.** Children

We are committed to protecting the privacy of children. This Website is not designed or intended to attract children under the age of 18. We do not collect Personal Information from any person we actually know may be under the age of 18.

### C. Emails to Greenfield Community College

This Privacy Policy does not protect you when you send questions, business information, ideas, concepts or inventions to Greenfield Community College by email to the various Greenfield Community College departments listed on the "Contact Us" link (or other link) on our Website. If you want to keep business information, ideas, concepts or inventions private or proprietary, do not send them in an email to Greenfield Community College. We try to answer every email in a timely manner, but are not always able to do so.

# D. The Family Educational Rights and Privacy Act of 1974 (FERPA)

You are accorded certain rights regarding the privacy of information that we maintain about you. Those rights are explained in the college policy which follows.

Greenfield Community College, in compliance with the Family Educational Rights and Privacy Act of 1974, also known as the Buckley Amendment, its subsequent amendments and pursuant regulations, has established this policy to inform students of their rights under this Act and to enumerate its basic provisions. The purpose of the Act is to protect the confidentiality of student education records and to allow students access to their own education records. Copies of this Act are available in the Student Records Office.

# **DISCLOSURE OF YOUR INFORMATION**

Except as set forth in this policy or as specifically agreed to by you, Greenfield Community College will not disclose any Personal Information it gathers from you on our Website. We may release Personal Information to third parties: (1) to comply with valid legal requirements such as a law, regulation, search warrant, subpoena or court order; or (2) in special cases, such as a physical threat to you or others. In the event that we are legally compelled to disclose your Personal Information to a third party, we will notify you unless doing so would violate the law or court order.

#### A. Disclosure to Greenfield Community College Subsidiaries and Divisions

Greenfield Community College may disclose Personal Information to its corporate subsidiaries or other divisions of the organization. Any Personal Information provided to subsidiaries or divisions of Greenfield Community College will be treated by those entities in accordance with the terms of this Privacy Policy and the P.I.I. most recent act(s).

# **B.** Disclosure to Greenfield Community College Operations and Maintenance Contractors

Greenfield Community College operations and maintenance contractors sometimes have limited access to your Personal Information in the course of providing products or services to Greenfield Community College. These contractors include vendors and suppliers that provide us with technology, services, and/or content related to better operation and maintenance of our Website. Unless you have opted out of receiving emails and newsletters from Greenfield Community College, these contractors also may have access to your email address to send newsletters or special promotions to you on our behalf or to send emails to you for purposes such as conducting market research on our behalf. Access to your Personal Information by these contractors is limited to the information reasonably necessary in order for the contractor to perform its limited function for Greenfield Community College. We also contractually require that our operations and maintenance contractors 1) protect the privacy of your Personal Information for any purpose other than providing us with products and services.

### **C. Disclosure to Advertising Partners**

Greenfield Community College does not sell advertising to or accept advertising from other parties for display on the Website; consequently, Greenfield Community College makes no disclosure of any Personal Information to such entities.

### How Greenfield Community College Handles Privacy and Security Internally

Greenfield Community College wants your Personal Information to remain as secure as possible. That is why we have a two-tier security system at Greenfield Community College that combines leading technical safeguards and a code of conduct for those employees who are permitted to access your Personal Information. On the technical side, Greenfield Community College uses Secure Socket Layer (SSL) encryption technology in transmitting your Personal Information to systems to help ensure the integrity and privacy of the Personal Information you provide to us via the Internet. Encryption involves systematically scrambling numbers and letters, so that even if someone managed to intercept the information, they would not be able to make sense of it. In order to take advantage of this encryption technology, you need to have an Internet browser that will support 128-bit encryption, such as Netscape or Microsoft Explorer. On the employee side, only a limited number of Greenfield Community College employees are authorized to access your Personal Information. All Greenfield Community College employees must abide by our Privacy Policy and those who violate our Privacy Policy are subject to disciplinary action, up to and including termination. Although we will make every reasonable effort to protect your Personal Information from loss, misuse, or alteration by third parties, you should be aware that there is always some risk involved in transmitting information over the Internet. There is also always the risk that someone could find a way to thwart any security system around the world.

# YOUR PRIVACY CHOICES

From time to time on the Greenfield Community College Website, you may be given the option of receiving recurring information or newsletters via email from Greenfield Community College and/or directly from third parties.

If you wish to subscribe to such newsletters via email, we ask for contact information, such as

name and email address. You can unsubscribe from the newsletters by simply clicking on the "unsubscribe" link at the bottom of any email newsletter. An email to our automated unsubscribe service will be created on your machine. Click the "send" button. You will then be unsubscribed from that newsletter.

This privacy statement applies only to the Greenfield Community College Website. The Greenfield Community College Website does contain links to other sites. Once you enter another Website (whether through an advertisement, service, or content link), be aware that Greenfield Community College is not responsible for the content or privacy practices of such other sites. We encourage you to look for and review the privacy statements of each and every Website that you visit through a link or advertisement on Greenfield Community College's site or any site that collects Personal Information from you.

# UPDATING YOUR PERSONAL INFORMATION AND CONTACTING GREENFIELD COMMUNITY COLLEGE

You can always contact us in order to (1) request your Personal Information from our systems with appropriate security verification, (2) update the Personal Information that you have provided to us, and (3) change your preferences with respect to marketing contacts or other activities, by contacting us at the location below. Such changes will not have any effect on other information that Greenfield Community College maintains. If you have a complaint or problem you may email us at Site Administrator and your complaint will be forwarded to the appropriate internal Greenfield Community College department for a response or resolution. We try to answer every email in a timely manner but are not always able to do so. If you do not receive adequate resolution of a privacy related problem, you may write to Greenfield Community College's Privacy Help Desk at:

# **Greenfield Community College**

1 College Drive, Greenfield, MA, 01301

PH 413-775-1000

You should be aware that it is not technologically possible to remove each and every record of the information you have provided to Greenfield Community College from our servers. The need to back-up our systems to protect information from inadvertent loss means that a copy of your Personal Information may exist in a non-erasable form that will be time consuming for us to locate.

Privacy as it applies to the Internet is a dynamic, and rapidly developing area. In the future, we may make significant changes to our privacy policy affecting the use of the Personal Information we collect. We will notify you via email of any significant changes concerning our use of your Personal Information and obtain your "opt-in" consent to all significant new uses of your Personal Information if it was collected from you prior to a drastic change in this policy. We may also make non-significant changes to our Privacy Policy that generally will not affect our use of your Personal Information and we generally would not notify you of these non-significant changes. You should check this posted Privacy Policy for any non-significant changes when possible. If you do not agree to the terms of this Privacy or any revised policy, please exit the Website site immediately.