XAVIER UNIVERSITY
WEB PRIVACY POLICY

Effective: March 02 2010
Last Updated: June 2024
Last Reviewed: June 2024
Responsible University Office: Information Technologies
Responsible Executive: Associate Provost and Chief Information Officer
Scope: Students, full time and adjunct faculty, staff, retirees, non-employee associates, and guests

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A. REASON FOR POLICY

Xavier University (the "University") considers the privacy of its web visitors a priority. The University has adopted the following policy (the "Web Privacy Policy") to articulate the terms and conditions of the collection, use, and dissemination of any information the University may receive from the users of Xavier.edu (the "Website"). Please note, however, that this policy has been developed with the knowledge that web technologies continue to develop and evolve rapidly, and that such changes may require us to alter the Web Privacy Policy. Any such alterations will not affect Xavier's commitment to the protection of privacy. Your use of the Website indicates your acceptance of this Web Privacy Policy.

The University also complies with the Family Educational Rights and Privacy Act (FERPA), which prohibits the release of education records without student permission, except in limited circumstances. For more details on FERPA, currently enrolled students may consult the Office of the Registrar.

B. POLICY

1. INFORMATION GATHERING

Web Visit Logs

To make the Website more useful, the University automatically collects certain information when users visit the Website, including but not limited to, IP addresses, date and time of visits, pages viewed and click-streams. No personally identifiable information will be collected or tracked without permission. The data is used by the University to tune the web site for efficiency. This means that user sessions may be tracked, but the users will remain anonymous.

Use of Cookies

The Website may use "cookies," which are text files holding small amounts of data, to collect

information to anonymously track how visitors interact with the Website, including where they came from or what they did on the Website. The University uses this analytical information to improve users' experiences online. Our cookies do not contain any personally identifiable information.

Users do not need to have cookies turned on to use the Website. However, users do need cookies to participate actively in message boards, forums, polling and surveys.

Search terms that users enter into the Xavier Search Engine may be tracked, but this tracking is not associated with individual users.

Information Voluntarily Provided By Users
In the course of using the Website, users may choose to provide the University with information to help the University serve them. For example, an individual may send an email (through a mailer or a web form) to request information, sign up for a mailing list, or send their address in order to be sent an application or other material. Any personally identifiable information sent to the University will be used only for the purpose indicated. Requests for information will be directed to the appropriate staff to respond to the request, and may be recorded to help the University update the Website to better respond to similar requests. Each web page requesting information discloses the purpose of that information. Users that do not wish to have their information used in that manner may opt-out of providing it. Users are encouraged to contact the University with questions or concerns about the use of personally identifiable information.

The University will not sell, exchange or otherwise distribute personally identifiable information without consent, except to the extent required by law. Xavier does not retain the information longer than necessary for normal operations.

2. **SECURITY**
The University has put into place security measures on the Website to safeguard the integrity of its communications and computing infrastructure, and protect against the loss, misuse and alteration of the information under its control, including but not limited to authentication, monitoring, auditing, and encryption. Once the University receives any transmission from a user, the University will make its best effort to ensure its security and on our systems. The University does so by using secure technology, privacy protection controls, and restrictions on employee access. These security practices are consistent with the policies of the University as well as State and Federal laws. Due to the nature of electronic communications, no data transmission over the internet can be guaranteed to be completely secure. While the University remains committed to protecting the privacy of users, we cannot ensure or warrant the security of any information transmitted to the University electronically, nor can the University guarantee that information supplied by visitors to the site will not be intercepted while being transmitted over the Internet.

3. **SHARING OF INFORMATION**
The University does not release confidential information gathered through the web. For example, the University's portal, MyXU, enables users to customize the content they see on their personal page. This information is not shared with third parties.

The University's public directory on the Website details workplace contact information about faculty and staff only. Xavier student contact information is protected from access outside the Xavier domain. In

an attempt to respect student privacy from external entities, the University's online directory of student information is only available to the internal Xavier community.

4. **PUBLIC FORUMS**

Xavier makes some public chat rooms, forums, message boards, and news groups available to its users on the Website. The University does not ordinarily log public chat sessions; however, any information that is disclosed in these areas becomes public information and all users should therefore exercise caution when deciding to disclose confidential information in such places.

Academic chat sessions and discussion forums, such as those in Blackboard or MyXU, may be logged; however, these education records are protected from disclosure by FERPA.

Online surveys may be conducted on the Website at any time. Persons responsible for conducting online surveys that collect personally-identifiable information should clearly state, at the survey site, the extent to which any information provided will be shared or protected. Aggregate data from surveys may be shared with third parties in ways that do not compromise privacy.

5. **EXTERNAL LINKS**

The Website contains links to other independently-managed web sites within the Xavier network and to some sites outside the Xavier.edu domain. When a user visits another site, the privacy policy of that site governs its use. The University is not responsible for the privacy practices or the content of other websites.

6. **AD SERVERS**

We do not partner with or have special relationships with any ad server companies. We never use or install spyware on your computer, nor do we use spyware to retrieve information from your computer.

NOTIFICATION OF POLICY CHANGES

The University reserves the right to change the Web Privacy Policy at any time. Such changes will be posted on the Website and will become effective upon Posting.

CONTACTING XAVIER

Please contact the Division of Information Resources' Policy and Security Committee [at irpsc@xavier.edu with any questions about the Web Privacy Policy.

AUTHORITATIVE SOURCE

The authoritative source for this policy, and responsibility for its implementation, rests with the Chief Information Officer.

APPROVAL AND REVIEW HISTORY

Adopted by the Division of Information Resources' Policy and Security Committee: 1-7-2009
Reviewed and approved by the Information Resources Leadership Team: 1-20-2009
Reviewed and approved by the CIO: 2-13-2009
Reviewed by the University Technology Committee: 2-23-2009
Reviewed by the Academic Technology Committee: 2-27-2009
Placed on the MyXU portal for review and comment by the Xavier community: March 2009
Reviewed and approved by attorneys[1]: 6-22-2009
Reviewed and approved by the President's Cabinet: 3-2-2010
Reviewed with minor updates by Information Security Manager: 6-12-2024

REVIEW CYCLE
This policy will be periodically reviewed and updated as appropriate.