



## XAVIER UNIVERSITY Wi-Fi Location Data Policy

**Effective:** July 1, 2026

**Last Updated:** N/A

**Last Review:** N/A

**Responsible University Office:** Office of the Provost

**Responsible Executive:** Associate Provost of Strategic Initiatives

**Scope:** All members of the Xavier Community

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### **A. REASON FOR POLICY** (if applicable)

This policy outlines how location data is collected, used, and protected when someone (employees, students, and non-employees/students) connects to Xavier University's campus wireless network. It ensures transparency, safeguards privacy, and supports campus operations and research in a responsible and ethical manner.

### **B. POLICY**

The University's wireless network gathers basic location data as devices move from one access point to another. This includes details like device type, connection logs, and general location. This data is stored and managed in alignment with Xavier's Record Retention Policy.

Xavier University may use campus wi-fi location data for:

- **Educational Support:** As part of a student's education records, data for a particular device may be accessed for legitimate educational interests as permitted by FERPA including engagement analytics, academic success monitoring, and safety responses.
- **Campus Operations:** Aggregated, anonymized data may be used in planning for space usage, safety, and accessibility.
- **Institutional Planning:** Aggregated, anonymized data may be used to enhance learning environments and infrastructure.
- **Network Support:** Data may be used for diagnosing connectivity issues and improving service.
- **Research:** Only de-identified data may be used for approved research. Use of personally identifiable data for research requires explicit consent.

Xavier University generally does not share personally identifiable Wi-Fi location data without consent. The university may share this data:

- In cases of health, safety, or emergency issues with law enforcement;
- As required by legal obligation; or
- In extraordinary circumstances, upon review of the General Counsel and with the approval of the Board of Trustees.

Students, staff, and faculty at Xavier University have the following rights regarding their campus Wi-Fi location data:

- **Consent:** Personally identifiable campus Wi-Fi data will not be used for research or shared beyond the uses specified above without the user's consent.
- **Transparency:** Users may inquire to Information Technologies about how their personally identifiable data is used and who has access.
- **Control:** Users may choose to opt-in to research studies involving their personally identifiable campus Wi-Fi location data.

#### **C. DEFINITIONS** (if applicable)

1. **Wi-Fi Location Data:** data that includes details like device type, connection logs, and general location.
2. **User and Device Information:** data that may include username, device-specific (MAC) address, Internet (IP) address.
3. **Location Information:** data that may include the location of the wireless access point (building, room, coordinates) to which the device connected.
4. **Connection Logs:** data that may include timestamps of device connections and disconnections.
5. **Personally Identifiable Information:** data is personally identifiable if the data:
  - a. includes direct identifiers (explicitly identifiable) data tied to a user's ID, username, device MAC address, account login, device signature, or any institutional credential, **or**
  - b. includes indirect identifiers (potentially identifiable in combination with other information) data detailed enough to infer who the user is (e.g., consistent location patterns, building or residence hall access, unique movement patterns).

#### **D. PROCEDURES** (if applicable)

None at this time.

#### **E. EXHIBITS** (if applicable)

None at this time.

#### **F. HISTORY** (if applicable)

First version, 2026.

This policy was formally executed on May 12, 2026, with an effective date of July 1, 2026. It has been developed and issued in full alignment with the standards and spirit outlined in our Policy on Polices.

**G. REVIEW SCHEDULE**

Next Review: To be determined.

**H. RELATED POLICIES AND RESOURCES: n/a**