

Global University Privacy Policy

Privacy Policy

Global University (GU) is committed to ensuring the privacy and accuracy of your confidential information. GU does not actively share personal information collected electronically or via hardcopy/paper means, or gathered from its Web servers. However, while GU does not actively share information, in some cases GU may be compelled by law to release information collected and gathered from its Web servers.

As part of its commitment to maintain the privacy of its students, alumni, constituents and Web users, GU has developed this privacy statement. The statement has two purposes:

- To educate users about privacy issues.
- To inform users about specific privacy policies and guidelines employed at GU.

GU also complies with the Family Educational Rights and Privacy Act (FERPA), which prohibits the release of education records without student permission.

Scope

This policy applies to information collected:

- on GU's Websites;
- in email, text, and other electronic messages between you and a GU support team;
- through mobile and desktop applications (including browser and Outlook extensions) you download from GU Websites or other application stores (such as the Apple App Store® the Google Play® Store and the Microsoft Office® Store), which provide you access to Global University services.
- Hardcopy/paper applications, enrollments, forms, donations, academic assessment items, letters, and other hardcopy/paper information collection means.

Exceptions

The GU website, globaluniversity.edu, may contain links to hundreds of external websites. We are not responsible for the privacy practices or the content of external websites.

Information Gathered by GU

We collect various types of information about you, including that which may directly identify you, that which is about you but does not personally identify you, and that which we combine with information from our other users. Included is information that we collect directly from you, through automated collection technologies, or through your use of GU's services.

General Information We Collect

When you apply as a student, support as a donor, register to use GU's services or our Websites, we collect several types of information from and about users, specifically information:

- by which you may be personally identified, such as name, postal address, e-mail address, telephone number, or any other identifier by which you may be contacted online or offline ("Personal Data");
- that is about you but does not identify you, such as traffic data, location data, logs, referring/exit pages, date and time of your visit to GU Websites, error information, clickstream data, and other communication data and the resources that you access and use on the Websites; and/or
- about your internet connection, the equipment you use to access GU Websites, and usage details.

We collect this information:

- directly from you when you provide it to us; and
- automatically as you navigate through the Websites. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

Information You Provide to Us

The information we collect on or through GU Websites includes:

- information that you provide by completing forms on GU Websites. This includes information provided at the time of application, enrollment, and/or subscribing to a GU service or requesting further services.
- records and copies of your correspondence (including email addresses), if you contact us.
- details of transactions you carry out through GU Websites or Apps, and of the fulfillment of your orders or donations. You may be required to provide financial information before placing an order or donation through GU Websites or Apps.

The Personal Data we collect from you is required in order to enter an educational relationship, a contract, with Global University, for Global University to perform our obligations under the contract, and to provide you with GU courses, products, and services. If you choose not to provide such Personal Data or withdraw your consent to GU processing of Personal Data, then we may not be able to enter into the contract or fulfill a contractual obligation to you.

You also may provide information to be transmitted to third parties (collectively, "Communications"). Your Communications are transmitted to others at your own risk. Although we use technology to protect your Communications, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of the recipients of your Communications, who may forward them to third parties or otherwise disclose them. Therefore, we cannot and do not guarantee that your Communications will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with GU Websites or use GU services, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns. We collect:

- details of your visits to GU Websites or Apps, specifically traffic data, location data, logs, referring/exit pages, date and time of your visit to GU Websites or use of Apps, error information, clickstream data, and other communication data and the resources that you access and use on the Websites;
- Information about your computer, mobile device, and internet connection, email or calendar client, specifically your IP address, mobile device make and model, operating system, and browser type. The information we collect automatically may include Personal Data or we may maintain it or associate it with Personal Data we collect in other ways or receive from you or third parties. It helps us to provide you with GU services, to improve GU services, and to deliver a better and more personalized service by:
 - estimating our audience size and usage patterns;
 - storing information about your preferences, allowing us to customize GU Websites and the Apps according to your individual interests;
 - recognizing you when you return to GU Websites or use our Apps.

Information We Collect through Providing You with Global University services

As you use GU services, we may collect certain information about your Communications. We collect:

- the contents and header information from the Communications you send and receive through the service. This may vary by the systems used to send and receive information, but header information will generally include at least the sender's and recipient's email address, subject line, message size, the date and time the Communication was sent and received by each server used in the delivery, the system name and IP address of each system used in the delivery, and other similar metadata;
- geolocation data from your mobile device, if you have enabled this feature.
- information about events in your calendar, such as event titles, attendees, locations, and meeting times.
- responses from the recipients of your Communications, if you have enabled this feature.

The information we collect as a result of your use of GU services includes information that may be in the subject line or in the contents of your Communications, along with any Personal Data which may be in it. This information is used to provide you with GU services.

Third-Party Content

Some pages within the globaluniversity.edu domain may contain content that is served from external third parties. Please be aware that when you visit pages that contain third-party content, information such as your IP address, date, browser, and requested page are

transmitted from your computer to that third party. GU is not responsible for the privacy practices of any external third party.

Lawful Basis for Processing Your Personal Data

We have a lawful basis for processing your Personal Data. GU may process data for our legitimate interests (when balanced against your rights and freedoms), to fulfill a contractual obligation to you, and required by law, and with your consent.

If you are in the European Union, the processing of your Personal Data is lawful only if it is permitted under the applicable data protection laws. We have a lawful basis for each GU processing activity except in special circumstances as described below:

- **Consent.** By using GU Websites, Apps, and GU services, you consent to GU's collection, use, and sharing of your Personal Data as described in this privacy policy. If you do not consent to this privacy policy, please do not use the Websites, Apps, or other GU services; (let's talk about consent. The weakness of consent is that it can be removed/revoked, meaning we have to purge all their data from everywhere – a time consuming and difficult process. Also, under GDPR, they are to have access to services even if they did not provide consent.)
- **Legitimate Interests.** We will process your Personal Data as necessary for our legitimate interests. GU's legitimate interests are balanced against your rights and freedoms and we do not process your Personal Data if your rights and freedoms outweigh our legitimate interests. Specifically, GU's legitimate interests are to: facilitate communication with you; detect and correct programming flaws. This includes improving GU's Websites, Apps, and all GU services; safeguarding our IT infrastructure and intellectual property; detecting and preventing fraud and other crime; promoting and marketing our business; checking your credit and performing risk assessments; collecting non-identifiable data in order to provide new features of the Service, and improving GU products and services
- **To Fulfill Our Obligations to You under GU's Contract.** We process your Personal Data in order to fulfill our obligations to you pursuant to GU's educational agreement, Contract, with you to deliver educational courses, services, and related goods to you. Specifically, we process your Personal Data to provide you with the features and functionality of the GU services that you are using; and
- **As Required by Law.** We may also process your Personal Data when we are required or permitted to by law in order to comply with government inspection, audits, and other valid requests from government or other public authorities; to respond to legal process such as subpoenas; maintain academic accreditation/recognition; or as necessary for us to protect GU's interests or otherwise pursue our legal rights and remedies (for instance, when necessary to prevent or detect fraud, attacks against GU's network, or other criminal and tortious activities), defend litigation, and manage complaints or claims.

How We Use Your Information

We use your Personal Data for various purposes described below, mostly involved in providing educational services and collecting payment. With your consent, we'll send you occasional promotional emails, such as news and announcements of new features. We also occasionally collect non-personal, aggregated data as you use GU services, so we can improve the learning environment and servicing of our students and partners.

We may use your data for specific purposes we may describe when you provide the information. Data may be used to:

- present GU Websites and their contents to you;
- provide information about GU services that you request from us;
- provide you with GU services that you may subscribe to;
- fulfill any other purpose for which you provide it;
- provide you with notices about your account, including expiration and renewal notices;
- carry out GU's obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- notify you about changes to GU Websites or other GU services

With your consent, we may also use your information to contact you about other GU services that may be of interest to you, such as newsletters and other promotional material. If you wish to change your choice, you may do so at any time by logging into the Service and adjusting the user preferences in your account profile or by emailing support@globaluniversity.edu. For more information, see Choices About How We Use and Disclose Your Information.

Disclosure of Your Information

We do not share, sell, or otherwise disclose your personal data for purposes other than those outlined in this Privacy Policy. We may disclose your Personal Data to a few third parties, as described below.

, We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Data that we collect or you provide as described in this privacy policy:

- to contractors, service providers, and other third parties we use to support our institution and who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. Specifically, these entities provide IT and infrastructure support services, and payment processing services.
- to fulfill the purpose for which you provide it.
- for any other purpose disclosed by us when you provide the information;
- to the recipients of your Communications that you specify; and
- with your consent.

We may also disclose your Personal Data:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to enforce or apply our terms of use and other agreements, including for billing and collection purposes; and
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Global University, our students, partners, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Information

We offer you choices on how you can opt out of our use of tracking technology, disclosure of your Personal Data for third parties to advertise to you, our advertising to you, and other targeted advertising. We don't currently have any advertising in the Services (or any plans to add it), but we want to cover our bases in case that has to change some day.

We do not control the collection and use of your information collected by third parties described above in Disclosure of Your Information. When possible, these organizations are under contractual obligations to use this data only for providing the services to us and to maintain this information strictly confidential. These third parties may, however, aggregate the information they collect with information from their other customers for their own purposes. Additionally, we cannot control the actions of the recipients of your Communications, who may forward them to other third parties or otherwise disclose them.

In addition, we strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with control over your Personal Data:

- **Promotional Offers from Global University.** We will only use your contact information to promote our own products and services with your express consent (this means, at a minimum, a check box on every application or other data collection tool asking for permission to provide promotional information). Our promotional e-mails also include an unsubscribe link that you may select at any time to opt out of receiving future promotional information via email. This opt out option does not apply to information provided to GU as a result of a subscription to GU services, a download of GU Apps, a product service experience, or other transactions.

Your Rights Regarding Accessing or Correcting Your Information

You may have certain rights under applicable data protection laws, including the right to access and update your Personal Data, restrict how it is used, transfer certain Personal Data to another controller, withdraw your consent, or the right to request certain Personal Data be erased. You also have the right to submit a complaint about the processing of your Personal Data.

Applicable data protection laws may provide you with certain rights with regards to GU's processing of your Personal Data.

- **Access and Update.** You may review and change your Personal Data by notifying GU through the contact information below of any changes or errors in any Personal Data we have about you to ensure that it is complete, accurate, and as current as possible. We may not be able to accommodate your request if it violates any law, conflicts with any legal requirement, or cause the information to be inaccurate.
- **Restrictions.** You have the right to restrict the processing of your Personal Data under certain circumstances. In particular, you can request we restrict our use of it if you contest its accuracy, if the processing of your Personal Data is determined to be unlawful, or if we no longer need your Personal Data for processing, but we have retained it as permitted by law.
- **Portability.** To the extent the Personal Data you provide Global University is processed based on your consent or that we process it through automated means, you have the right to request that we provide you a copy of, or access to, all or part of such Personal Data in a readable format. You also have the right to request that we transmit this Personal Data to another controller, when technically feasible.
- **Withdrawal of Consent.** To the extent that our processing of your Personal Data is based on your consent, you may withdraw your consent at any time. Withdrawing your consent will not, however, affect the lawfulness of the processing based on your consent before its withdrawal, and will not affect the lawfulness of our continued processing that is based on any other lawful basis for processing your Personal Data.
- **Right to be Forgotten.** You have the right to request that we delete all of your Personal Data. We cannot delete your Personal Data except by also deleting your user account, and we will only delete your account when we no longer have a lawful basis for processing your Personal Data or after a final determination that your Personal Data was unlawfully processed. We cannot accommodate a request to erase information if the deletion would violate any law or legal requirement or cause the information to be incorrect. In all other cases, we will retain your Personal Data as set forth in this policy. In addition, we cannot completely delete your Personal Data as some data may rest in previous backups. These will be retained for the periods set forth in our disaster recovery policies.
- **Complaints.** You have the right to lodge a complaint with the applicable supervisory authority in the country you live in, the country you work in, or the country where you believe your rights under applicable data protection laws have been violated. However,

before doing so, we request that you contact GU directly so that we have an opportunity to resolve your concerns about your Personal Data.

- **How You May Exercise Your Rights.** You may exercise any of the above rights by contacting GU. When you contact us you may be asked to confirm information in your record to verify your identity. We reserve the right to limit or deny your request if you fail to provide sufficient information to verify your identity or if your request conflicts with a legal or business requirement.
- **If it does not come later, we need to provide contact information for exercising their rights.**

Do Not Track Signals

We may use automated data collection technologies to track you across websites. We currently do not honor do-not-track signals that may be sent by some browsers.

We also may use automated data collection technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they "do not track" your online activities. At this time, we do not honor such signals and we do not modify what information we collect or how we use that information based upon whether such signal is broadcast or received.

Security

Information transmitted over the Internet is never completely secure, but we do our best to protect your Personal Data. You can help protect your Personal Data and other information by making sure you don't remain logged in on shared devices and making sure you have strong passwords on personal devices. Please follow good password practices.

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Please be careful to log out of the Service on any shared computers and use passcode protection on any device where you remain logged into the Service. Where we have given you (or where you have chosen) a password for access to certain parts of our Websites or GU services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to GU services. Any transmission of Personal Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures used in the Boomerang Services.

Consent to Processing of Personal Data in the United States

We may process your Personal Data outside of your home country, including the United States. We only do this when we are legally permitted to do so and when we have appropriate safeguards in place to protect your Personal Data.

If you are a resident of the European Economic Area ("**EEA**"), in order to provide our Websites, products, and services to you, we may send and store your Personal Data outside of the EEA, including to the United States. Accordingly, your Personal Data may be transferred outside the country where you reside or are located, including to countries that may not or do not provide an adequate level of protection for your Personal Data.

Your Personal Data is transferred by Global University to another country only if it is required or permitted under applicable data protection law and provided that there are appropriate safeguards in place to protect your Personal Data. By using GU services, you represent that you have read and understood the above and hereby consent to the storage and processing of Personal Data that you provide to us on our Websites, App, or other through GU services.

Data Retention Periods

GU may retain your Communications or Personal Data, as applicable:

- for as long as necessary to comply with any legal, licensure, and/or accreditation requirement;
- on our backup and disaster recovery systems in accordance with our backup and disaster recovery policies and procedures;
- for as long as necessary to protect our legal interests or otherwise pursue our legal rights and remedies; and
- for data that has been aggregated or otherwise rendered anonymous in such a manner that you are no longer identifiable, indefinitely.

Changes to Our Privacy Policy

GU may change this Privacy Policy at any time. It is GU policy to post any changes on the Websites' or Apps' home page/screen and/or communicate changes via email. You are responsible for ensuring GU has an up-to-date active and deliverable email address for you, and for periodically visiting GU Websites and this Privacy Policy to check for any changes.

E-Commerce

Sites within GU may enable you to pay for products or services online with a credit card. Although GU makes every effort to ensure that the third parties providing these transactions are encrypted, GU is not responsible for the privacy practices of these external third parties.

Data Processor

Global University is the data Processor of your personal data that you provide to Global University.

Digital Millennium Copyright Act

The Digital Millennium Copyright Act (DMCA), described as the most dramatic change to copyright law in a generation, was the 105th Congress's effort to update copyright law for the digital environment. Please be aware that under the DMCA, GU reserves the right to terminate computing services of users who repeatedly infringe upon the rights of copyright owners.

Questions/Notifications

If you have questions about this privacy statement or notice of infringement, etc., please contact Global University in writing.

Global University
Attn: Personal Data Office
1211 S. Glenstone Ave.
Springfield, MO 65804