

Privacy Policy for the Siena College Website

COLLEGE POLICY

Policy Title:	Privacy Policy for the Siena College Website
Type or category of Policy:	This is a COLLEGE Policy
Approval Authority:	This policy and any major changes will be approved by the Provost and Senior Vice President for Academic Affairs
Responsible Executive:	The Chief Information Officer is the Responsible Executive for this policy.
Responsible Office:	Responsible Office: Information Technology Services (ITS)
Owner Contact:	Questions or Concerns should be addressed to: Information Security Administrator informationsecurity@siena.edu
Reviewed By:	Information Security Committee (ISC)
Reviewed Date:	12/15/2020
Last Revised and Effective Date of Revision:	12/16/2020

Brief Overview of the Policy

Siena College's website collects some information when you visit the website. This will allow us to ensure the utmost performance and experience while on the website.

Reason for Policy

The purpose of this policy is to inform users of the Siena College website of the information that may be collected and how it is managed and used by the College.

Scope of the Policy

The scope of this policy includes all users that visit the Siena College website for information pertaining to Siena College and their services.

The Official Policy

Siena College is committed to safeguarding the privacy of personal data. This policy outlines the collection, use, and disclosure of personal information provided to the College by visitors. When information is submitted to Siena, or you use the College's websites and other services, you consent to the collection, use, and disclosure of that information as described in this policy.

Information Collected

When visiting www.siena.edu, some data is automatically collected and used in conjunction with analytics tools to gather metrics on site usage to inform our understanding of how our sites are being used. The information we collect is not linked to anything that identifies you as an individual. As part of Google Analytics, we gather general geographic location, pathways navigated through the website, and device and browser-related information including client hostname, browser version, and IP addresses.

Cookies

Cookies are text files stored on your computer and accessible only to the websites which create them. We use cookies to keep you logged into secure areas, retain site preferences, and gauge site utilization. If you share our content through social media, such as liking us on Facebook or tweeting about us on Twitter, those social networks will record that you have done so and may set a cookie for this purpose.

Log Files

Our websites automatically gather anonymous information about our visitors including IP addresses, browser types, and the times and dates of webpage visits. The information collected does not include any personally identifiable details and is used for site administration.

Third Party Sites

In order to provide you with certain services you may be redirected to a third party website so you may submit information for services or e-commerce transactions. The website may require you to provide your personal information such as name, address, date of birth, or even credit card information if making purchases. Siena College only enters into agreements with companies that abide and adhere to the Payment Card Industry Data Security Standards (PCI DSS) as well as Siena College policy and procedures when handling personally identifiable information (PII). These websites have separate privacy and security policies; it is always a good practice to review the privacy policy of any website you visit.

College Use of Information

Siena collects and processes personal data ("Information") from individuals only as necessary in the exercise of the College's legitimate interests, functions and responsibilities as a private, non-profit institution of higher education. Information collected from students or student applicants is used to register or enroll persons in the College, provide and administer housing to students, manage a student account, provide academic advising, develop and deliver education programs, track academic progress, analyze and improve education programs, recruitment, regulatory reporting, auditing, maintenance of accreditation, and other related College processes and functions. Siena also uses Information to conduct general demographic and statistical research to improve College programs, to identify appropriate support services or activities, provide reasonable accommodations, enforce College policies or comply with applicable laws. Finally, Information may be shared by Siena with third parties who have entered into contracts with the College to perform functions on behalf of the College, subject to the obligation of confidentiality and safeguarding from unauthorized disclosure.

Security

We implement appropriate technical and organizational security measures to protect your information when you transmit it to us and when we store it on our information technology systems.

Special Notice for EU Residents

If you are located within the European Economic Area (European Union, Norway, Liechtenstein, and Iceland), we acknowledge the rights granted to you under the General Data Protection Regulation (GDPR).

These rights may include:

1. Right to access your information held by us
2. Right to correct inaccurate or incorrect information about you
3. Right to the erasure of your information when it is no longer necessary for us to retain it
4. Right to restrict processing of your personal information in specific situations
5. Right to object to processing your information, including sending you communications that may be considered direct-marketing materials
6. Right to object to automated decision-making and profiling, where applicable
7. Right to complain to a supervisory authority in your jurisdiction within the EU

Your information will be retained by the College in accordance with applicable state and federal laws. Your information will be destroyed upon your request unless applicable law requires destruction after the expiration of an applicable retention period or if the information is still necessary for the purpose for which it was collected. The manner of destruction shall be appropriate to preserve and ensure the confidentiality of your information given the level of sensitivity, value and criticality to the College.

Please contact gdpr@siena.edu if you wish to exercise any of these rights or if you have any questions or concerns.

Policy Changes

We may update or change this policy at any time. Your continued use of the College's website and third party applications after any such change indicates your acceptance of these changes.

Adopted: 1/22/14

Reviewed: 12/15/2020

Revised: 11/17/2020