



<p align="center"><b>Policy Title</b> Website Privacy Policy</p>	<p align="center"><b>Original Adoption Date</b> 9/1/2020</p>	<p align="center"><b>Policy Number</b> RP-800</p>
<p align="center"><b>Responsible College Division/Department</b> Strategy and Outreach</p>	<p align="center"><b>Responsible College Manager Title</b> Vice President of Strategy and Outreach</p>	
<p align="center"><b>Policy Statement</b></p> <p>Lakeshore Technical College (LTC) is committed to protecting privacy and developing technology that gives a safe online experience. This Privacy Notice describes LTC’s policies and practices regarding the collection and use of information on the college website, however accessed. By using the Lakeshore Technical College website, the user consents to the privacy practices described in this Privacy Notice.</p> <p><b>Personal Information Collected</b></p> <p>The information collected varies depending on the type of website activity or use of services. At times, personal information is collected and in other instances the college website will collect other information in order to deliver services or as part of operating this website. Lakeshore Technical College collects personal information during the following processes: admission, financial aid, internship or job application, or other request for information processes. The information gathered includes but not limited to:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Home or work address</li> <li>• Telephone number</li> <li>• Date of Birth</li> <li>• Social Security Number</li> <li>• High School Attended</li> <li>• Gender</li> <li>• Marital Status</li> <li>• Ethnicity</li> </ul> <p>Not all requested information is required; however, information required will be noted in order to obtain the information or service requested.</p> <p><i>User Content.</i> Posted content and information, such as uploads, comments, images, messages (“User Content”) when using certain parts of the college website may be accessed and viewed by other users of the website and services. Personal information should not be posted as part of the User Content. The college is not responsible for any personal information in User Content.</p> <p><b>Other Information Collected on the College Website</b></p> <p>Personal information will need to be provided by the user when browsing or using the college website. The college website, however, automatically collects certain information automatically about use of the college website and services. Although this information is not personally identifiable, the interactions or information regarding the device used to access the college website and services (collectively “Other Information”). This information includes:</p> <ul style="list-style-type: none"> <li>• IP address</li> <li>• Device information, such as hardware setting browser type and language</li> <li>• Identifiers associated with cookies or other technologies that may uniquely identify a device or browser (e.g. device advertising ID)</li> </ul>		



- Pages viewed, access times, and referring website addresses
- Searches conducted

### **How Personal Information is Used**

Lakeshore Technical College collects and uses personal information to operate the Lakeshore Technical College website and deliver the services requested. Lakeshore Technical College also uses personal information to inform of other products or services available from Lakeshore Technical College and its affiliates and, more specifically, uses information to provide the user with the following personal experience during the following user interactions:

- Deliver services, including providing access to our website's online features, such as applications and engaging in other transactions
- Communicate about products and services, including respond to personal requests or respond to any other inquiry or correspondence sent
- Present marketing relating to LTC, including more relevant display advertisements
- Contact user on behalf of a third party business partner to inform the user about a particular offering that may interest the user
- Provide updates, reminders, or other informational or educational content
- Enable user to participate in a survey
- Enable user to participate in blogs and post testimonials. If user provides a testimonial, the name will be publicly posted along with the testimonial. Please remember that blogs and testimonials are located in the public areas of our website. Do not share content that the user would not want others to read, save, or share
- Consider user for admission, financial aid, or employment
- Analyze and improve the website and services: including developing and improving products and services, monitoring and analyzing trends and usage
- Prevent, detect, investigate, or remediate security or other legal concerns, including fraud
- To protect the rights, property, or safety of users, or any other person or the copyright-protected content of the services
- Comply with applicable laws, regulations, or industry requirements, or respond to subpoenas or government requests
- Fulfill any other purpose for which the user provides it or consent

Lakeshore Technical College does not use or disclose sensitive personal information, such as race, religion, or political affiliations, without explicit consent.

### **How Information is Shared**

The college may share information collected about the user in the following situations:

- With service providers:
  - Information about the user with service providers to perform functions and process data and to help provide services including hosting and storage providers, payment processors etc.
  - Service providers are prohibited from using personal information except to provide these services to LTC, and they are required to maintain the confidentiality of information
- With third parties for legal or security reasons:
  - The college may share information about the user if the college reasonably believe that



disclosing the information is needed to:

- Comply with any valid legal process, governmental request, or applicable law, rule, or regulation
- Investigate, remedy, or enforce potential violations of our Terms of Use of Privacy Notice
- Protect the rights, property, and safety of us, our users, or others
- Detect and resolve any fraud or security concerns
- The college may disclose or share personal information in connection with an admissions or employment application to verify the information provided
- With user consent, the college may share information in other ways if the user gives the college consent or directs the college to do so
- The college do not share personal information with third parties for their marketing purposes

### **How Cookies are Used**

The Lakeshore Technical College website uses "cookies" to help personalize the user's online experience. A cookie is a text file that is placed on the user's hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to the user computer. Cookies are uniquely assigned to the user, and can only be read by a web server in the domain that issued the cookie to the user. One of the primary purposes of cookies is to provide a convenience feature to save the user time. The purpose of a cookie is to tell the web server that the user has returned to a specific page. For example, if the user personalizes Lakeshore Technical College pages, or register with Lakeshore Technical College website or services, a cookie helps Lakeshore Technical College recall the user's specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When the user returns to the same Lakeshore Technical College website, the information previously provided can be retrieved, so the user can easily use the Lakeshore Technical College features that the user customized.

The user has the ability to accept or decline cookies. Most web browsers automatically accept cookies, but the user can usually modify their browser setting to decline cookies if preferred. If you choose to decline cookies, the user may not be able to fully experience the interactive features of the Lakeshore Technical College services or websites visited.

### **Access and Choices Regarding Information**

A user can access and update most of their account information on the college website by clicking on "MyLTC". If the user needs to access, update, or delete other personal information that the college may have, the user can request it by changing it on "MyLTC", or sending a request to LTC's Student Services. Name changes must be requested in person. To protect user privacy, before the user has access or let the user updates information, the college may ask the user to verify identity or provide additional information. The college will try to update and allow the user to access the user's information free of charge; however, if it would require a disproportionate effort on the college's part, the user may charge a fee. The college will disclose the fee before the college complies with the user's request. The college may reject a request for a number of reasons, including, for example, that the request risks the privacy of other users, requires technical efforts that are disproportionate to the request, is repetitive, or is unlawful.

### **Security of Personal Information**



Lakeshore Technical College uses reasonable measures to secure personal information from unauthorized access, use or disclosure. Please keep in mind that the Internet is not a 100% secure medium for communication, and the college cannot guarantee that the information collected about the user will always remain private when using services. As a result, while the college strives to protect personal information, the college cannot guarantee the security of any information transmitted, and the user does so at their own risk.

**How Google Analytics is Used**

For analytics, the college uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics may set cookies on a browser or mobile device or read cookies that are already there to collect information. Google Analytics may also receive information about the user from apps downloaded that partner with Google. Google Analytics collects information such as how often a user uses a mobile application or website and how the user uses the college App or website. The college uses the information provided by Google Analytics to improve services. The college does not combine the information collected using Google Analytics with personally identifiable information.

For more information regarding how Google collects, uses, and shares information please visit <http://www.google.com/policies/privacy/partners/>. By using our App and website, the user consents to the processing of data about the user by Google as described here and in Google’s privacy policy. The user can control the information provided to Google and opt out of certain ads provided by Google by using of the of the methods set forth in <http://www.google.com/policies/privacy/partners/> or use the Google Analytics opt out browser add-on at <http://tools.google.com/dlpage/gaoptout?hl=en>

**Links to Other Websites and Services**

The college is not responsible for the practices employed by websites or services linked to or from the LTC Website, including the information or content contained in such websites or services, and this policy does not apply to them. The browsing and interaction on any third-party website or service, including those that have a link on our Website, are subject to that third party’s own rules and privacy policies. Please read the terms of such websites carefully and exercise care when providing your personally identifiable information.

**Do Not Track**

LTC’s website does not support Do Not Track (DNT) at this time. DNT is a privacy preference the user can set in their web browser to indicate that they do not want certain information about their web page visits tracked and collected across websites. For more details, including how to turn on Do Not Track, visit [www.donottrack.us](http://www.donottrack.us).

**Reason for Policy**

Lakeshore Technical College is committed to protecting privacy and developing technology that results in a safe online experience via LTC’s website.

**Historical Data, Cross References and Legal Review**

**Reviewed/Revised:**

**Legal Counsel Review and Approval:**

**Board Policy: III.A. General Executive Constraint, III.B. People Treatment**

**Definitions**