



OPERATIONAL POLICY: 5.31

Operational Policy Owner: Vice President of
Financial and Administrative Services

Online Privacy

OPERATIONAL POLICY STATEMENT

Yavapai College (YC) provides online information and services to students, employees, and the community to supplement services provided at our physical locations. YC is required to disclose its practices related to privacy and confidentiality surrounding the use of its websites and other online services. In addition to the contents of this document, the following operational policies may contain information related to the use of computing and communications system at YC: Technology Resource Standards (5.27), Retrieval, Disclosure and Retention of Records (5.28), and Electronic Communications (5.29).

Family Educational Rights and Privacy Act

YC complies with the Family Educational Rights and Privacy Act (FERPA), which generally prohibits the release of students' academic records without consent.

General Data Protection Regulation (GDPR)

YC shall make all reasonable efforts to comply with the provisions of the European Union GDPR. European Union Residents are encouraged to view the specific YC GDPR Operational Policy 5.36 for additional information and GDPR-specific contact information.

Information Gathering

YC may collect and record information from users and network-connected devices such as computers and mobile devices, including but not limited to: Internet Protocol (IP) addresses, device and browser fingerprints, information requested or delivered, referring address, etc. YC will also collect and store metadata related to your use of our services, including bandwidth and services utilized. YC's vendors and third-party partners may also collect, store, and process similar information.

Logs related to this data collection will be retained pursuant to Arizona State Library records retention requirements and relevant YC operational policies and procedures (additional information may be found here: <https://azlibrary.gov/arm/retention-schedules>). This information may be used to help diagnose problems with YC technical resources, analyze traffic patterns and usage trends, to identify and assess security incidents, and to mitigate potential or prosecute real abuses of College resources. We may also share these logs with vendors and third-parties to aid in the identification and resolution of technical problems or to address security concerns and incident response.

Cookies

YC and its business partners may utilize 'cookies' on some of our web properties and in certain applications and services. A cookie is a small text file that may be used to identify, store, or collect information about a user or computing device. This data may be used to verify identity or provide authorization to access resources, to store preferences and customizations, to track communications history, to analyze performance, or for other purposes such as marketing.

You are not required to accept the cookies that YC or its partners make use of, however if you are unable or unwilling to allow YC or partner cookies, your online experience may be degraded or significantly impaired. In such cases, you may contact the appropriate YC business unit to identify alternative methods of conducting business if available.

Information Sharing - Third Party Services

Yavapai College may utilize third parties to provide certain services to YC constituents, for example email, learning management services, payment processing, etc. YC may provide information, including personal or confidential information, to these service providers to help us deliver programs, products, information, and services. YC takes reasonable steps to ensure that these service partners protect information transmitted to them.

Information Disclosure

YC makes reasonable efforts to limit disclosure of confidential or personal information. If you are a student, certain information you provide to us may be considered directory information and subject to public disclosure. Additionally, YC is obligated to disclose certain information upon request to government agencies. YC is also subject to public records laws and must abide by court orders or issues of public safety which may result in the disclosure of personal or confidential information.

Information Security

YC takes a variety of steps to ensure confidential information remains secure and is not disclosed without proper authorization or cause. Official YC technical infrastructure has appropriate physical, electronic, and managerial procedures in place to safeguard and secure collected and/or stored information. Additionally, YC employs industry standard encryption technologies when collecting, storing, or transmitting confidential or sensitive data. YC requires the same protections by vendors who collect, store, or share confidential information provided by or related to YC and/or its constituents.

External Content

YC is not responsible for the privacy practices nor the content of third-party services and websites which may be linked to by College web pages or referenced in other College materials, including those with which YC has a contractual relationship. Constituents are encouraged to review privacy operational policies for each of these sites and services.

OPERATIONAL POLICY HISTORY

Adopted 4/1/2014

Revised 8/20/2019

Revised to "Operational" Policy and owner reassigned 3/5/2021
