



## **Burrell College of Osteopathic Medicine Privacy Notice**

The College's Privacy Notice is generally applicable to activities conducted by Burrell College of Osteopathic Medicine that involve the processing of personal data. This notice provides a broad overview of the range of activities that require personal data processing and the approach to protecting privacy. We value the privacy of the College community and its guests and strive to protect individual privacy by:

- informing individuals about our practices
- collecting the minimum amount of personal data necessary for legitimate business purposes and legal compliance
- limiting access to personal data to appropriate individuals
- using appropriate physical and technical security measures to protect personal data
- integrating privacy principles in the design of projects that involve the use of personal data.

### **Definitions**

In this notice, "personal data" is defined as any recorded information that is about you and from which you can be identified. It does not include data where your identity has been removed — anonymous data. Personal data "processing" refers to anything that we do with that information—including collection, use, storage, disclosure, deletion or retention.

### **Types of Personal Data We Collect**

We collect personal data from you directly through automated processes (e.g., learning management tools or our websites) and from third party entities. We generally collect and use data from the various groups listed below:

- Prospective students: to facilitate admission and provide higher education services, we collect personal and family information related to the application and financial aid process, including supporting documentation, identification and contact information; education history, demographic information (e.g., race, gender, and age) as volunteered, testing history, personal information and history, employment history, and payment information.
- Students: to register, administer financial aid, manage the payment processes between you and the College, administer the repayment of debts, track academic progress, and provide academic advising and other services, we use information submitted as prospective students, information related to academic record and performance, subscription data for online courses, video and picture images for marketing purposes, video images recorded by our video security system for the purposes of ensuring physical security and to protect College property.
- Faculty and staff: to administer an employment relationship with the College, we collect identification, contact information, biographic information, employment and education



history, payment and tax information, family and health information related to benefits, and information related to performance at work.

- Alumni: to manage their relationship and engagement with the College, we collect identification, contact information, and donor information.
- Research subjects: in the exercise of scientific, historical research, or for statistical purposes, we collect identification and contact information and all information that is produced and observed in relation to the subject as part of a research project.
- Participants in conferences, symposia and other campus events: to register, track payment and participation, we collect identification, contact information, payment information, and possibly data related to health for accommodation.
- Website visitors: to understand and save their preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences, we collect contact information, IP address, browser type, referring URL, phone GPS, internet service provider, pages visited, operating system, date and time of visit, location information, and other information collected through cookies. We collect information you provide to us, for example any form fields on our website and interactions on our website (such as buttons you clicks, etc.).
  - Information collected through automatic data collection technologies may include Cookies, pixel tags, server logs, web beacons, plugins and/or chatbots.
  - Some content or applications on the website are served by third parties (ex. Google Analytics). Third-party use of automatic data collection technologies collect information about you when you use our website. The information they collect may be associated with your personal information including information pertaining to your online activities over time.
  - We do not control these third parties' tracking technologies or how they may be used. If you have questions about an advertisement or targeted content, you should contact the responsible provider directly.
- Campus visitors: to facilitate their visit, we collect contact information and video images recorded by our video security system for the purposes of ensuring physical security and to protect College property.

Personal data is processed for regulatory purposes such as accreditation and licensure. We must have a legal basis for processing your personal data such as legitimate educational interests. We occasionally process other types of personal information for various legitimate and specific purposes. When these situations occur, we endeavor to inform the data subjects of such occasional processing activities.

## **How We Use Your Personal Data**

We use the personal data we collect to facilitate the operations and educational activities of the Burrell College of Osteopathic Medicine. We only use the personal data for the purposes for which it was collected, unless we reasonably consider that it is needed for another related reason and that the reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent.



We use information collected on our website in a variety of ways, including any of the following:

- To present our website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provided Personal Information to us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.
- To display advertisements to our advertisers' target audiences. Even though we do not disclose your Personal Information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

## **Sharing Your Data with Third Parties**

We may share your data with third parties who contract with the Burrell College of Osteopathic Medicine to help administer our operations. All of our third-party service providers are required to take appropriate security measures to protect your data in accordance with our policies. We do not allow them to use your data for their own purposes. We permit them to process your data only for specified purposes in accordance with the terms of the contract. We may also share your personal data with third parties to comply with any legal obligation, administer a contract you have with the College, and/or assist College-affiliated programs regarding contacting you about goods, services, charitable giving, or experiences that may be of personal interest. Other circumstances where we may need to share your personal data with third parties include where we have your consent to do so or when it is necessary to protect the health and safety of you or others. Where your data is shared with third parties, we will seek to share only the necessary pertinent information.

## **How We Secure Your Information**

The College recognizes the importance of maintaining the security of the information we collect and maintain. We strive to ensure reasonable security measures are in place, including physical, administrative, and technical safeguards to protect your personal information. Please visit our data security policy: <https://burrell.edu/policy-b2050/>

## **Cookies and Other Technology**

Many internet browsers automatically accept cookies. You may be able to instruct your browser or select settings on your mobile device to stop accepting cookies or to prompt you before accepting cookies from our website. If you disable or refuse cookies, some parts of our website may be inaccessible or not function properly. The College's website does not respond to "Do Not



Track” signals. You can ask to review, update or make changes to personal information by sending a written request to [compliance@burrell.edu](mailto:compliance@burrell.edu). We do not control third parties’ collection or use of your information. However, these third parties may provide you with ways to choose not to have your information collected.

## General Data Protection Regulation (GDPR)

In addition to the general privacy information provided above, if you are located in the EU or EEA, then our processing of your personal data may be subject to the General Data Protection Regulation, or GDPR. GDPR is a data privacy law that applies to personal data collected from the EU or EEA. This GDPR supplement to the Privacy notice above outlines the collection, use and disclosure of personal data provide to the Burrell College of Osteopathic Medicine by individuals while located in the EU and/or EEA including but not limited to: prospective students, applicants for admissions, enrolled students, alumni, employees (prospective and current), research subjects, donors contractors and vendors, event participants and customers. When you submit information to the College or use the College’s website and/or other electronic services, you consent to the collection, use, and disclosure of that information as described:

- Personal Data Collected
  - Website and Mobile Applications
    - We collect personal data from visitors and users of any of the College’s websites and mobile applications such as browser and device type, IP address, and pages visited. We also gather the data that is entered into various web forms. The personal data is used to respond to your inquiries and to conduct analytics to maintain and improve our websites and mobile platforms as well as provide you with relevant marketing and other communications.
    - The legal basis for this type of data use includes: (1) facilitating transactions requested by you and to meet our contractual obligations, e.g., registering participants for events; (2) the College’s legitimate interests (such as analytics); (3) your consent, where applicable.
  - Admissions, Financial Aid, Academic Services
    - We collect personal data from prospective and enrolled students such as contact information, demographic information — race, gender, age, education history, family information, testing history, personal financial information, and payment information. The personal data collected during the admissions process by the College or by third parties on the College’s behalf is primarily used for the purposes of: considering a potential student’s candidacy for admission to the relevant School/College, program or course; evaluating your eligibility for financial aid, if applicable; and, if you are admitted and enroll, facilitating your education and access to College programs and services.
    - The legal basis for this type of data use includes: (1) facilitating transactions requested by you and to meet our contractual obligations, e.g., processing your application for admission; (2) the College’s legitimate interests (such



as providing educational offerings and conducting admissions research);  
(3) your consent, where applicable.

- Alumni and Donors
  - We collect personal data from our alumni, donors, and prospective donors — contact and demographic information, financial and payment information, education history, and employment information. We also transfer some personal student data to our alumni organization database. The personal data collected is used to provide opportunities to engage with the College’s alumni and students, facilitate alumni and donor communications, events, fundraising and operations, request and process donations, and share information about other giving and volunteer opportunities.
  - The legal basis for this type of data use includes: (1) facilitating transactions requested by you and to meet our contractual obligations, e.g., registration for events or processing of donations; (2) the College’s legitimate interests (such as requesting gifts or donations); (3) complying with a legal obligation; and (4) your consent, where applicable.
- Registration for Campus Events and Online Education
  - We collect personal data from participants who register for the College’s campus events and programs and enroll in online courses or programs. The personal data collected includes: contact and payment information, cookies and other technology data, education history, course engagement and assessment data, and possibly data related to health for accommodation purposes.
  - The legal basis for this type of data use includes: (1) facilitating transactions requested by you and to meet our contractual obligations, e.g., registration for events or online courses and programs; (2) the College’s legitimate interests (such as providing educational offerings and evaluating your performance); (3) complying with a legal obligation; and (4) your consent, where applicable.
- Employees and Job Applicants
  - We collect personal data from potential, current, and former employees of the College — contact and biographical information, employment and education history, payment and tax information, family and health information related to benefits, and information related to performance at work. The personal data collected is used to evaluate your application for employment or other work relationship and communicate hiring decisions, as well as administer employment–related processes and facilitate employment-related operations, including payroll processing and the provision of employee benefits.
  - The legal basis for this type of data use includes: (1) facilitating transactions requested by you and to meet our contractual obligations, e.g., managing employment relationships; (2) the College’s legitimate interests (such as managing employment relationship and administrative responsibilities);



(3) complying with a legal obligation (e.g., providing information to tax authorities); and (4) your consent, where applicable.

○ Research

- We collect personal data from people who have or are participating as research subjects at the College, with the personal data collected about you varying depending on the specific research project in which you have participated or are participating. Personal data collected by college researchers — or on their behalf — is done so for the primary purpose of furthering research and understanding in fields of academic study. College researchers will generally provide you with a consent and/or authorization form relating to the specific research project that explains the types of data collected and the purposes for which such data are processed and shared. That consent or authorization form supersedes the information provided in this Notice.
- The legal basis for this type of data use includes: (1) facilitating transactions requested by you and to meet our contractual obligations, e.g., paying faculty, employees, research collaborators and research consultants; (2) the College's legitimate interests (such as conducting research); (3) complying with a legal obligation (e.g., reporting adverse events to regulatory authorities that oversee the safety of medical products and research); (4) processing data that is necessary for scientific or historical research purposes and is performed consistent with required data protection safeguards; (5) the necessity of performing tasks that are in the public interest (e.g., further research and understanding in fields of academic study); and (6) your consent, where applicable.

● How We Use Personal Data

- We use personal data in a variety of ways including those identified above in connection with the specific categories of personal data. Below is a summary of the different purposes for which we use your personal data that includes the uses above as well as some additional uses. Under certain circumstances, these additional uses may be based on your consent, or may be necessary to fulfill our contractual commitments to you, for legal compliance, or to serve our legitimate interest in the following operations:
  - Responding to your requests or inquiries
  - Carrying out our business operations and administering our educational programs and services
  - Administering fellowships, grants and other programs in support of individual study and research projects
  - Acquiring feedback through research, surveys and similar inquiries to increase our understanding of trends and needs individuals using our websites or other services
  - Requesting and processing gifts and donations
  - Maintaining compliance with accreditation requirements



- Compiling statistics and conducting surveys and research for internal and statutory reporting purposes
- Issuing safety or security alerts
- Preventing, investigating, and addressing fraud, unlawful or criminal activity, other misconduct, security or technical issues, or unauthorized access to or use of personal data, our website or data systems
- Meeting legal obligations including responding to subpoenas, court orders, or other legal process, enforcing our agreements, and protecting the health, safety, rights or property of you, the College, and others
- Providing communications, announcements, and other information that may be of interest to you
- Processing and fulfilling your requests to purchase College merchandise or other products
- Engaging analytics to prepare marketing, promotions and advertising, either directly or through third parties, that may be of interest to you
- Legal Bases for Processing – Legitimate Interests
  - Under GDPR, there are several legal bases on which data is processed at the College. As noted above, this may include your consent, where it is necessary for entering into or for the performance of a contract, or where it is necessary for the College’s legitimate interests. Below are several legitimate interests on which the College relies in using and sharing your personal data:
  - Under certain circumstances, these additional uses may be based on your consent, or may be necessary to fulfill our contractual commitments to you, for legal compliance, or to serve our legitimate interest in the following operations:
    - Promoting the success of our current and former students, faculty, staff, and programs
    - Providing and improving our educational programs
    - Furthering research and understanding in fields of academic study
    - Engaging alumni, donors, and prospective donors, and connecting them with others
    - Conducting and growing the College’s operations
    - Ensuring the safety and security of members of the campus community
    - Meeting the College’s institutional obligations and enforcing our legal rights
    - Evaluating and improving our online platforms and user experience
    - Protecting against fraud, spam, harassment, intellectual property infringement, crime, and security risks
    - Cybersecurity
    - Providing opportunities to volunteer and to attend College events
- IV. Your Rights
  - In light of the College’s data processing activities that are subject to GDPR, the College strives to facilitate the exercise of the rights granted to you by GDPR in a timely manner. This includes ensuring the:



- **Rights to confirm, access, correct, and other requests** — You have the right to obtain information about the personal data we process about you as well as a copy of the data. Additionally, and under certain circumstances, you may have the right to correct or update any of your personal data that is inaccurate, to request the deletion of your personal data, to restrict or limit the ways in which we use your data, and to request transfer of your personal data to another party. Upon a reasonable, good faith request, we will provide you with information about whether we hold any of your personal data as part of our EU/EEA processing activities to the extent required by and in accordance with applicable law.
- **Right to object** — You have the right to follow opt-out instructions in our marketing emails and to object to any processing of your personal data based on your specific situation. In the latter case, we will assess your request and provide a reply in a timely manner according to our legal obligations.
- **Right to withdraw consent** — You have the right to withdraw your consent at any time for all data processing operations that are consent-based, and we will stop those processing operations subject to certain legal limitations. In some cases, you can do this by discontinuing use of the services involved in the EU/EEA processing activities. This may include closing all of your online accounts with the College and contacting us at [compliance@burrell.edu](mailto:compliance@burrell.edu) to request that your personal data be deleted. If you withdraw your consent to the use or sharing of your personal data for the purposes described in this or other College privacy statements that link to or expressly adopt this privacy notice, you may not have access to the related services, and we might not be able to provide you all (or any) of the services.
- **Note:** In certain cases, we may continue to process your personal data after you have withdrawn consent and requested that we delete your personal data if there is a legal basis to do so. For example, we may retain certain data if we need to do so to comply with a legal obligation, if we still need the data for the lawful purposes for which we obtained the data, or if it is necessary to do so to pursue our legitimate interest in keeping our services and operations safe and secure.
- When you make requests based on the rights listed above, you may be asked for further personal information to confirm your identity and used solely for the purposes of responding to your request.
- **Retention Period**
  - Personal data is kept on record at the College only as long as necessary for the purposes it was collected and processed. The disposition of your information is subject to the retention periods of applicable state and federal law. Retention periods vary and are established considering our legitimate interests and all applicable legal requirements. If you consented to the use of your information, you have the right to withdraw consent without affecting the College's lawful use of



the information prior to receiving your request to withdraw consent. Please see College's record retention schedules and disposition at <https://burrell.edu/policy-b2090/>

- International Data Transfers
  - When you interact with the College either directly or through a third party, your personal information is transferred to the United States. The United States currently is not deemed by the European Commission to have an adequate level of legal protections for personal data information. The College relies on appropriate or suitable safeguards or specific derogations recognized under data protection laws including the GDPR. In particular, we rely on your explicit consent for some of the data transfers and on necessity for the performance of a contract or the implementation of pre-contractual measures taken at your request (e.g., for the transfer of personal data necessary for your application for admission to the College). We may also use Standard Contractual Clauses specifically adopted by the European Commission to provide safeguards for personal data transferred outside of the EU/EEA.

## Privacy Notice Changes

This privacy notice may be updated from time to time. We will post the date our notice was last updated here: ***Last Revision Date — August 1, 2023***

## Contact

If you have any questions about our practices around the use of personal information, contact [compliance@burrell.edu](mailto:compliance@burrell.edu). We will respond to your request in a timely manner and will do our best to address your concern.

Under GDPR, if you believe we have not been able to deal with your concern appropriately, you have a right to complain to your local data protection authority, as granted by Article 77 of GDPR. You also have the right to submit a complaint in the EU/EEA Member State of your residence, place of work or of an alleged infringement of GDPR.