

## **Ferris State University Website Privacy Policy**

### **Effective as of February 16, 2021**

This Privacy Policy is designed to help you understand how Ferris State University and its related organizations and affiliates, including Kendall College of Art and Design (“Ferris”, “we”, “us” or “our”) collects, uses and shares personal information collected through this website. We value your privacy, and we will not share your personal information with third parties except as described in this Privacy Policy without your consent.

BY USING THIS WEBSITE, YOU AGREE TO BE BOUND BY THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH ANY OF THE TERMS OF THE PRIVACY POLICY, PLEASE DO NOT USE THIS WEBSITE OR PROVIDE US WITH YOUR INFORMATION.

#### **What this Privacy Policy Covers**

This Privacy Policy applies to our collection, use and sharing of your personal information (a) when you visit our website at [www.ferris.edu](http://www.ferris.edu) and its related sites, including [kcad.ferris.edu](http://kcad.ferris.edu) (the “Site”), (b) receive our communications or participate in our online or offline activities or events, (c) fill out an application for admission on our website, and (d) that we obtain from third parties such as resellers, database vendors, content publishers and suppliers.

This Privacy Policy applies only to information gathered on and through the Site and does not apply to any other information or websites not owned or operated by Ferris or information collected by Ferris by other means.

#### **Personal Information We Collect**

Information You Give Us. Personal information you may provide through the Site or otherwise communicate to us includes:

- *Contact information.* We collect information about you when you provide contact information to us via email, mail, or through the Site, including as a result of creating an account, filling out an application for admission through the Site, registering for a contest, making a donation to us, or registering for a campus visit. This information may include your first and last name, email address, mailing address, phone number, and credit card information.
- *Sensitive personal information.* We collect information that may be considered sensitive, such as your country of citizenship, race, gender, and social security number, through our Site’s online application process.
- *Feedback and correspondence.* We may collect information about you when you request information, respond to surveys, or otherwise correspond with us.
- *Other information.* We may collect other information from you that is not specifically listed here. We may use such information in accordance with this Privacy Policy.

Information We Get From Others. We may obtain additional information about you from third party sources, such as service providers, vendors, social media sites, and advertising agencies to provide you with more relevant information about our services.

Information Automatically Collected. Our servers and third party service providers may automatically record certain information about how you use the Site, such as your Internet Protocol (IP) address, device and browser type, operating system, DNS, the pages or features of the Site that you browsed and the time spent on those pages or features, the frequency with which you use the Site, the links that you click on or

use, and other statistics. We collect this information in server logs and by using cookies and similar tracking technologies. See our Cookie Policy below for more information.

Statistical Analyses. We use Google Analytics to help us gather statistical information about the visitors to our Site and how they use the Site on an anonymous, aggregate basis. However, we will not associate this data with your personally identifiable data unless required to do so to cooperate with law enforcement activity or other governmental request or to comply with law. We may use this information to gain a better understanding of the users of our Site, to improve our Site, and to improve our services. Depending on the type of browser and device that you use, you may have the ability to control the type of information that Google Analytics use. To understand how Google Analytics collects and processes data, please visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). We reserve the right to license or sell aggregate, de-identified information about the visitors to our Site, but this information will not contain your personal information or otherwise be individually identifiable.

Sensitive Personal Information. We may collect some sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, gender, and criminal background) through the Site as a result of our online application process for admission. In collecting this sensitive personal information, Ferris respects individual privacy, protects against unauthorized access to or use of information, and complies fully with all laws and government regulations in the collection, use, storage, display, distribution and disposal of such information. Authorized uses of sensitive information within Ferris are limited to uses which are necessary to: a) meet our legal and regulatory requirements; b) facilitate access to services, transactions, facilities and information; or c) otherwise support efficient academic and administrative processes.

### **How We Use Your Personal Information**

We use your personal information for the following purposes and as otherwise described to you in this Privacy Policy or at the time of collection:

To Provide the Site and Communicate with You. We use your personal information:

- to provide, maintain and improve the Site;
- to better understand your needs and interests, and personalize your experience with the Site;
- to process applications for admission that you submit through the Site;
- to register you for events, classes, and contests;
- to respond to your requests, questions, comments, and feedback; and
- to perform website analytics and database management services.

To Create and Maintain Your Account. When you enroll at Ferris, an account is created for you using certain personal information you provided during the enrollment process. You have choices about the information included in your account profile. You do not have to provide additional information on your profile; however, additional profile information may help you get more from our services. It is your choice whether to include sensitive information on your profile and to make that sensitive information public. Please do not post or add personal data to your profile that you would not want to be publicly available.

To Send You Communications. We may send you newsletters or other communications, but you may opt out of receiving them as described in the Your Choices section below. Your information may be used both while you are a current student at Ferris and after you have graduated from Ferris.

To Advertise To You. We may use your personal information to manage and serve ads in the Site or on third party sites and to tailor ads to your interests and browsing history. In addition to the cookies utilized

by us on this Site, Ferris may allow trusted third parties to place advertisements for our services on sites and applications operated by others. These third parties may use cookies and web beacons to measure the effectiveness of our ads and to determine the display of content and advertising to you based on your interests both on our Site and other sites and applications that you may visit (see our Cookie Policy below). To support this interest-based advertising solution, we and the companies we have contracted with may use anonymous information about your visits to our and other websites and applications. The information collected and used by this process is always anonymous and does not enable any third party to identify you individually. You can learn more about interest-based advertising and opt out of such advertising from certain companies at [aboutads.info](http://aboutads.info).

For Compliance, Fraud Prevention and Safety. We may use your personal information as we believe appropriate to: (a) investigate or prevent violation of the law or your agreements with us; (b) protect our, your or others' rights, privacy, safety or property (including by prosecuting and defending legal claims); (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity; (d) comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; and (e) where permitted by law in connection with a legal investigation. For example, we may share information with law enforcement to reduce the risk of fraud or if someone uses or attempts to use our site for illegal reasons.

With Your Consent. In some cases we may ask for your consent to collect, use or share your personal information.

### **How We Share your Personal Information**

We may use third parties to help us design and operate the Site, provide services to support the Site, process your information, and provide promotional and marketing activities on our behalf. For example, we may hire a company to run certain website applications, help us analyze our data, process your credit card information, or send information on our behalf about services and events in which you may be interested. Unless otherwise indicated at the time we collect your information, if we allow third parties to access the personal information we collect, we will have contractual provisions or other appropriate protections in place to ensure such access is for limited purposes and in compliance with this Privacy Policy.

We do not share your personal information with third parties without your consent, except in the following circumstances:

Ferris-Related and Affiliated Organizations. We may share your personal information with Ferris's affiliates and related organizations, such as Ferris's alumni organization, for use consistent with this Privacy Policy.

Service Providers. We may share your personal information with third party companies and individuals as needed for them to provide us with services that help us with our business activities and to promote our services to you. A list of our current service providers is available upon request.

Business Partners. We may share your personal information with our business partners who offer a service to you jointly with us. A list of our current business partners that have access to certain personal information we collect is available upon request.

Security, Compliance, Fraud Prevention, Safety; Compliance with Law. We may disclose your personal information as we believe appropriate to government or law enforcement officials or private parties for the purposes described above under the following sections: For compliance, fraud prevention and safety and for compliance with law.

Business Transfers. We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy.

### **Your Choices**

Opt Out of Marketing Communications. You may opt out of marketing-related emails by changing the communication preferences in your account settings or by following the opt-out prompt in the email. To opt out of other forms of marketing communications, please contact us using the contact information provided at the end of this Policy.

Consequences of Not Providing Personal Information. You are not required to provide all personal information identified in this Privacy Policy to use our Site or to interact with us offline, but certain functionality will not be available if you do not provide personal information. For example, if you do not provide personal information, we may not be able to respond to your request, perform a transaction with you, or provide you with marketing that we believe you would find valuable.

### **Cookie Policy**

What are Cookies? Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies set by the website are called “first party cookies”. Cookies set by parties other than the website are called “third party cookies”. Third party cookies enable third party features or functionality, such as advertising or website analytics, to be provided on or through the website. The parties that set these third party cookies can recognize your computer or device both when it visits the website in question and also when it visits certain other websites and/or mobile apps.

What Cookies and Other Tracking Technologies does Ferris Use? We use several different kinds of cookies on this Site, including strictly necessary cookies, which are cookies that are necessary for the Site to function and cannot be switched off in our systems; performance cookies, which allow us to count visits and traffic sources so we can measure and improve the performance of our Site; and functional cookies, which enable the Site to provide enhanced functionality and personalization. In addition to our own cookies, we collaborate with various third-party service providers who also use cookies to help us optimize our website and understand more about the visitors to our website. For example, we may use analytics providers like [Google Analytics](#) to provide us with demographic information about our visitors and to help us analyze how people use our website.

Cookies are not the only way to track visitors to a website. We may use similar technologies from time to time, like web beacons (sometimes called “tracking pixels” or “clear gifs”). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Sites. These technologies often depend on cookies to function properly, and so disabling cookies may impair their functioning. In addition, if you sign up to receive our e-mails, we will also use cookies in conjunction with these emails. When your browser downloads any graphic content in the e-mail, we will also place a cookie on your computer that will tell us if you come to our website at a later date.

How Can You Disable Cookies and Other Tracking Technology? Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.com](http://www.youronlinechoices.com). Some Internet browsers also may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

## **Other Important Privacy Information**

Third Party Sites and Services. The Site may contain links to other websites and services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. We do not control third party websites, applications or services, and we are not responsible for their actions. Other websites and services follow different rules regarding their collection, use and sharing of your personal information. We encourage you to read their privacy policies to learn more.

Security. The security of your personal information is important to us. We take a number of organizational, technical and physical measures that are designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the absolute security of your personal information.

International Data Use. We are located in the United States and have affiliates and service providers in other countries, and your personal information may be collected, used and stored in the United States or other locations outside of your home country. Privacy laws in the locations where we handle your personal information may not be as protective as the privacy laws in your home country.

Verifying, Changing, and Deleting Your Information. If you have registered for an account through our Site, you can access, review and manage many changes yourself via your account, including updating your profile information and changing your communication preferences. If the information you are seeking is not available within your account, you can contact us as detailed below and ask us to change, update or fix your information in certain cases, particularly if it is inaccurate. You can also request that we erase or delete all or some of your personal information or otherwise object to, limit, or restrict the use of such information (if we have no legal right or legitimate business interest in retaining such information).

### Children.

The Site is not intended for use by anyone under the age of 13, nor do we knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, you should not attempt to use the Site or send any information about yourself to us.

Changes to this Privacy Policy. We reserve the right to modify this Privacy Policy at any time. If we make changes to this Privacy Policy we will post them on the Site and indicate the effective date of the change. If we make material changes to this Privacy Policy we will notify you by email or through the Site.

### **Notice to European Users**

The following applies to individuals in the European Economic Area.

Controller. Ferris State University is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation.

Legal bases for processing. We are required to inform you of the legal bases of our processing of your personal information, which are described in the table below. If you have questions about the legal basis of how we process your personal information, contact us using one of the methods detailed at the end of this Policy.

<b>Processing Purpose</b>	<b>Legal Basis</b>
To provide the Site, communicate with you, create and maintain your account,	You are subject to a contract with us and we need to use your personal information to provide services you have

<p>and process your application for admission submitted through the Site.</p>	<p>requested or take steps that you request prior to providing services.</p>
<p>To establish and administer student accounts, issue invoices, and process payments and refunds.</p>	<p>You are subject to a contract with us and we need to use your personal information to provide services you have requested or take steps that you request prior to providing services.</p> <p>Ferris has a legitimate interest in charging tuition, fees, and other charges and collecting amounts due related to your education in order to maintain the university's fiscal stability.</p>
<p>To accept, review, and make decisions related to financial assistance programs, including preparing, executing, monitoring, and enforcing grant, scholarship, and loan agreements and notes documenting such financial assistance.</p>	<p>You are subject to a contract with us and we need to use your personal information to provide services you have requested or take steps that you request prior to providing services.</p> <p>Ferris has a legitimate interest in helping you find financial resources to pay for your education, in complying with third-party lender and federal and state requirements, and documenting and administering such financial assistance programs.</p>
<p>To register you for courses, confirm completion of required course work, accept, review, and evaluate student course work, and for accreditation and collaborative purposes.</p>	<p>You are subject to a contract with us and we need to use your personal information to provide services you have requested or take steps that you request prior to providing services.</p> <p>Ferris has a legitimate interest in establishing that you are enrolled and completing classes necessary to satisfy enrollment requirements (which may also be a condition to eligibility for certain benefits) and degree requirements, and scheduling and staffing courses, in assigning and evaluating homework, administering tests, and facilitating group instruction and learning.</p>
<p>To assign grades and other performance measures; confirm satisfaction of required classwork and out-of-class requirements applicable to the awarding of degrees; prepare transcripts and diplomas; and maintain long-term graduation and performance records and provide these to employers.</p>	<p>You are subject to a contract with us and we need to use your personal information to provide services you have requested or take steps that you request prior to providing services.</p> <p>Ferris has a legitimate interest in evaluating student performance, awarding degrees, recognizing outstanding achievements, holding graduation ceremonies, and providing its graduates and prospective employers with information confirming such performance, degrees, and achievements.</p>
<p>Maintain contact information for alumni and donors in order to send correspondence, magazines, newsletters, online communications, invitations, and to seek and accept gifts and donations.</p>	<p>Ferris has a legitimate interest in maintaining an ongoing relationship with alumni for informational, networking, job placement, continuing education, and fund-raising purposes, and in communicating the university's programs and successes to the general public.</p>

To send you marketing communications.  For compliance, fraud prevention, and safety.	These processing activities constitute our legitimate interests. We consider and balance the potential impact on your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
For compliance with law.	Processing is necessary to comply with our legal obligations.
With your consent.	Where we specifically ask for your consent to process your personal information, such processing is based on your consent. Where we rely on your consent, you have the right to withdraw it anytime in the manner indicated on the Site.
To share your personal information as described in this Privacy Policy.	This sharing constitutes our legitimate interests, and in some cases may be necessary to comply with our legal obligations.

**Retention.** We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

**Your Rights.** European data protection laws give you certain rights regarding your personal information.

You may ask us to take the following actions in relation to your personal information that we hold:

- *Access.* Provide you with information about our processing of your personal information and give you access to your personal information.
- *Correct.* Update or correct inaccuracies in your personal information.
- *Delete.* Delete your personal information.
- *Transfer.* Transfer a machine-readable copy of your personal information to you or a third party of your choice
- *Restrict.* Restrict the processing of your personal information.
- *Object.* Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by contacting us as detailed at the end of this Policy. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

**Cross-Border Data Transfers.** Any information you provide to us through the use of the Site may be stored, processed, transferred among, and accessed from the United States and other countries which may not guarantee the same level of protection of personal information as the one in which you reside. However, we will handle your personal information in accordance with this Privacy Policy regardless of where your personal information is kept. Regarding transfers from the European Economic Area

("EEA") to the United States, we rely on the derogations for transfers which are necessary to perform the transaction with you. Where required by law, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed below. If you reside in other non-US jurisdictions outside the EEA, your use of the Site or provision of any personal information constitutes your consent for the transfer of such data to the United States for the purposes identified above. If you have questions about cross-border transfers, please contact us as detailed below.

### **How to Contact Us**

Please contact us at one of the following and let us know if you have any questions or comments about our policies and practices.

Ferris State University: [privacy@ferris.edu](mailto:privacy@ferris.edu)

Kendall College of Art and Design (including Design West Michigan and Wege Prize):

[kcadprivacy@ferris.edu](mailto:kcadprivacy@ferris.edu)

Urban Institute for Contemporary Arts: [uicaprivacy@ferris.edu](mailto:uicaprivacy@ferris.edu)

You may also direct your inquiries to:

Ferris State University

1201 S. State Street

Big Rapids, Michigan 49307

United States of America

Attn: Web Marketing Manager

Phone: (231) 591-2000