



Westminster College Data Privacy Policy

Overview

Westminster College located in New Wilmington, Pennsylvania (hereafter “Westminster” or “the College”) has created this privacy policy to demonstrate our firm commitment to your privacy.

The College collects personal information that you send to Westminster College or that you permit us to obtain from third parties for purposes relevant to College operations in pursuit of its academic mission. Examples include information needed for student admission (including financial aid information), employment, Campus Store ordering, gifts/fundraising, institutional research, and topical surveys.

The College may use your personal information to process admission, financial aid, job applications, student or employee registrations, and other services and benefits that we provide to our students, employees, and other persons. Any email address, postal mailing address, phone number, or other contact information you provide may be used to send you information, respond to inquiries, and/or to make other requests or questions. The College also collects information from you when you access Westminster’s website and when you subscribe to our email services.

Westminster College will not sell or rent personal information to any outside entity. However, we may share your data internally among College departments in the ways described in this privacy policy. Data stored by Westminster College is not shared with outside agencies except as otherwise described in this policy.

Applicability of this Policy

This policy applies to anyone who provides or has previously provided personal information to Westminster, who authorizes Westminster to obtain data from third parties (e.g., Common Application), or who accesses Westminster College websites.

Online Forms

When you submit information or requests through any of the College's online forms, information, including contact information, email addresses, and other data is collected. Form information may be shared among College departments in the ways described in this privacy policy.

Data Sharing with Third-Party Service Providers and Others

On occasion, the College may contract with outside service providers, including, but not limited to, outside service vendors and SaaS software vendors. The College may share personal data with such third parties for completion of the services. We do not provide data to a third party for any purpose that is not directly related to College business. If data is provided to a third party the College will enter into an agreement with such third-party service provider defining the use of data by the third-party service provider as well as procedures for such data to be destroyed or returned at the end of the contract. Before entering into such a contract with a third party, the College reviews the third party’s data security practices and seeks assurances that it will comply with relevant industry best practices or governing standards and laws where appropriate.

We may also provide your information to third parties in circumstances in which we believe that doing so is necessary or appropriate to satisfy any applicable law, regulation, legal process, or governmental request; detect, prevent or otherwise address fraud, security, or technical issues; or protect rights, property, or safety. Westminster may also share information with third parties in aggregated form, after personally identifiable information has been removed, for higher education research purposes.

Site Activity Data and Data Logging

When you visit the Westminster.edu domains, the following information may be gathered with the use of cookies or pixels.

- Your Internet location (IP address)
- Pages you visit on our site
- Page from which you came to our site (referring site)
- Date and time
- Software used to visit our site and its configuration

Cookies are small files that are stored on your computer. We use cookies to save your preferences for future visits and to compile aggregate data about site traffic and interactions. We may contract with third-party service providers to assist us in better understanding our site visitors and to improve site functionality. You may be able to disable some cookies by changing the settings in your web browser, however, disabling cookies may disable certain functionalities on the website that rely on cookies to function.

Tracking pixels, like cookies, can be written into websites and other digital marketing materials. Pixels are used to provide analytics and insight into web traffic, digital preferences, and digital activity. Data curated from tracking pixels is managed directly by the third-party platform responsible for providing the pixel (Facebook, Google, Twitter etc.). You can manage what these platforms can collect about your online activity by managing your personal privacy and advertising settings within those platforms.

Beyond the Westminster.edu main website, Westminster's servers automatically collect and log information when you use Westminster's other web sites or computer systems. Log data may include your Internet Protocol (IP) address, date, and time the website or systems were used, and technical information about your devices and preferences. Log data may be used to facilitate your access to Westminster websites and services, monitor system performance, troubleshoot problems, and facilitate Westminster's response in the event of prohibited uses of computing resources, or unauthorized access to sensitive data in accordance with the Westminster College Responsible Use of Information Resources policy.

Social Media, Analytics and Digital Marketing

Westminster College uses online services and social media platforms to share information through organic and paid digital campaigns and to gather data for the purposes of analyzing trends, improving the user experience, and enhancing the accuracy of marketing campaigns. These sites and services may gather anonymous and personal data directly based on your online activity and personal privacy settings. Individual users are encouraged to monitor and adjust their personal privacy and security settings across the various online platforms as they deem appropriate.

On occasion, the College may provide personal data to a third-party social media platform or other vendor to enhance the accuracy of our digital marketing campaigns. If data is provided to a

third party, the College will enter into an agreement with such third party governing the use of such data. Westminster College reviews data security practices and requires the third party to comply with relevant industry best practices, governing standards and laws where appropriate.

How We Protect Your Data

The College employs a variety of technical and procedural measures to protect your information from misuse and unauthorized access. These measures include practices that limit access to your information to the fewest number of individuals who need that information for operational and strategic purposes. Westminster College implements a number of technology strategies such as firewalls, vulnerability management, log monitoring, data encryption, and other technical measures to safeguard your data from unauthorized access.

Billing and Credit Card Information

To enable payment via our merchant services provider, credit card information collected by Westminster College is used only to process your transaction. Credit card information will only be shared with third-parties who are contracted with Westminster College to complete the purchase transaction (e.g., those who help fulfill orders and process credit card payments). Credit card information is not stored on Westminster College servers. Terms and conditions related to student billing are available [here](#). For recurring draft donors, we do store bank account numbers and financial institution routing numbers to complete monthly transactions.

Rights of Individuals in the European Economic Area

If you are in the EEA, the College may use your personal information to process admission, financial aid, job applications, student or employee registrations, and other services and benefits that we provide to our students, employees, and other persons. If we offer or provide services to you, the following additional provisions beyond the general privacy statements set forth above apply in relation to how the College handles any personal data as provided in the General Data Protection Regulation (GDPR).

Under the GDPR, those rights include:

1. Right of access. You may request details of your Personal Information that the College holds. The College will confirm whether we are processing your Personal Information and we will disclose supplementary information including the categories of Personal Information, the sources from which it originated, the purpose and legal basis for the processing, the expected retention period, and the safeguards on Personal Information transfers to non-EEA countries, subject to the limitations set out in applicable statutes, regulations and other laws.
2. Right of correction. The College will comply with your request to edit and update incorrect Personal Information promptly.
3. Right to be forgotten. At your request, the College will delete your Personal Information promptly if:
 - it is no longer necessary to retain your Personal Information;
 - you withdraw the consent which formed the basis of your Personal Information processing;
 - you object to the processing of your Personal Information and there are no overriding legitimate grounds for such processing;
 - the Personal Information was processed illegally; or

- the Personal Information must be deleted for us to comply with our legal obligations.

The College will also inform any third parties we might have shared your Personal Information with of your deletion request.

The College will decline your request for deletion if processing of your Personal Information is necessary:

- to comply with our legal obligations;
 - in pursuit of a legal action;
 - to detect and monitor fraud; or
 - for the performance of a task in the public interest.
4. Right to restrict processing of your Personal Information. At your request, the College will limit the processing of your Personal Information if:
 - you dispute the accuracy of your Personal Information;
 - your Personal Information was processed unlawfully and you request a limitation on processing, rather than the deletion of your Personal Information;
 - we no longer need to process your Personal Information, but you require your Personal Information in connection with a legal claim; or
 - you object to the processing pending verification as to whether an overriding legitimate ground for such processing exists.
 5. Right to notice related to correction, deletion, and limitation on processing In so far as it is practicable, the College will notify you of any correction, deletion, and/or limitation on processing of your Personal Information.
 6. Right to data portability. At your request, the College will provide you with your Personal Information, if: (i) you provided us with Personal Information; (ii) the processing of your Personal Information is based on your consent or required for the performance of a contract; or (iii) the processing is carried out by automated means.
 7. Right to object. Where the College processes your Personal Information based on our legitimate interest then you have the right to object to this processing.
 8. Right not to be subject to decisions based solely on automated processing. You will not be subject to decisions with a legal or similarly significant effect (including profiling) that are based solely on the automated processing of your Personal Information, unless you have given us your explicit consent or where they are necessary for a contract with us.
 9. Right to withdraw consent. You have the right to withdraw any consent you may have previously given us at any time. If you withdraw your consent, this will not affect the lawfulness of our collecting, using and sharing of your Personal Information up to the time that you withdraw your consent. Even if you withdraw your consent, we may still use your information that has been fully anonymized and does not personally identify you.
 10. Right to complain to a supervisory authority. If you are not satisfied with the College's response, you have the right to complain to or seek advice from a supervisory authority or bring a claim against us in any court of competent jurisdiction.

If you provide information directly to Westminster College from the EEA, you thereby consent to the transfer of your personal information from outside the EEA to the United States. You understand that the current laws and regulations of the United States may not provide the same level of protection as the data and privacy laws and regulations of the EEA.

You are under no statutory or contractual obligation to provide any personal data to the College (other than personal data provided in connection with your status as a Westminster College student or employee, if applicable).

Location of Servers and Transfer Information to the United States

The data stored by the College are stored on campus servers in the United States or hosted data centers that are largely outside the European Union. Therefore, if you are located outside the United States, your personal data will be transferred to and stored on a server likely located in the United States. By submitting your personal data to the College, you consent to this transfer and to the collection, storage, processing and use of your personal data in the United States.

Disclaimer

The information found on the Westminster College website provides links to external websites located outside the 'westminster.edu' domain. Westminster College is not responsible for the privacy practices or the content of the external websites to which we link.

Additional Information

The College may change this Privacy Policy from time to time, and all updates will be posted to our website. As between The College and third-party service providers, The College is the controller of your personal data. Questions about this policy or your personal data can be addressed to marketing@westminster.edu.

Prospective Student Data

In addition to the general privacy provisions above, the following information applies to the personal data of those who apply for admission to the College:

- Personal data of prospective students collected either from the prospective student or from third parties with the prospective student's consent (for example, College Board) is used by the College to communicate information about Westminster College and its prospective student events and programs.
- Personal data provided by prospective students during the application process are used by the College to process the application for admission to Westminster College, and are therefore used in the performance of related services to be provided to the student applicant. These data are processed exclusively for Westminster College institutional purposes, connected or related to student application activities carried out by Westminster College. To facilitate the undergraduate application process, student applicants consent to the College sharing certain application status information with a student applicant's high school counselor. Student applicants also consent to the College sharing certain information with the U.S. Department of Education.
- Applicants may, but are not required to, provide information about race and ethnic origin in admission materials for consideration in a holistic review of the application. If voluntarily shared, this information could be used for aggregate reporting purposes and/or for research purposes. By sharing this information voluntarily, applicants consent to the College using the data for these purposes.

Prospective Student Email Opt Out

This privacy policy is available on all marketing emails from the College. There is also a link on all marketing emails that allows you to customize your communications preferences. You may opt out of some or all marketing communications from the College.

Financial Aid Data of Applicants for Admission

In addition to the general privacy provisions above, the following information applies to the personal data of student admission applicants who apply for financial aid:

- Personal data provided by prospective students during the admission application process are used by the College in the processing of applications for financial aid (need-based, merit, athletic, etc.) at Westminster College, and therefore are used in the performance of related services to be provided to the student applicant. These data are processed for Westminster College institutional purposes as well as for federal, state, and private aid purposes, connected or related to student aid application activities carried out by Westminster College. Student aid applicants consent to the College sharing certain information with the U.S. Department of Education, state aid authorities, and private aid entities, and to receiving data from those sources provided by student aid applicants and/or parents/guardians.
- Aid applicants are required to provide sensitive personally identifiable information for consideration in review of aid applications. Within federal and state guidelines, this information will be used for reporting purposes and/or for research purposes. By sharing this information, applicants consent to the College using the data for these purposes.

Enrolled Student Data

In addition to the general privacy provisions above, the following information applies to the personal data of enrolled students:

- The College may collect, use, store, and transfer student data. Student education records are subject to the College's FERPA Policy and the College follows FERPA regulations with regards to data sharing. The College uses student data to fulfill contractual obligations related to providing academic services, and to fulfill obligations established by any applicable law.
- Medical records regarding your health conditions are kept strictly confidential by the Wellness Center and are not disclosed without your written consent. The Wellness Center requires that you provide your immunization history to confirm that you have received the vaccinations required for enrollment at Westminster College. You are encouraged to provide additional health information that can assist the Wellness Center in addressing your health needs. Further, a student with a disability has the right to request academic and non-academic accommodations ensuring equal access to courses, course content, programs, services, and facilities. Students are not required to disclose their disability status; however, if they are seeking accommodations relative to their disability, they are responsible for making a written request to the Disability Resources Office and for providing the appropriate current documentation.
- Student data may be shared for legitimate educational purposes to designated school officials and third-parties as permitted by FERPA regulations and other applicable laws. Students may, but are not required, to provide sensitive data, such as race and ethnic origin. If voluntarily shared, this information could be used to identify and communicate specific programming interests, for grant writing, reporting, and/or for research purposes.

By sharing this information voluntarily, students consent to the College using the data for these purposes.

Financial Aid Data of Enrolled Students

In addition to the general privacy provisions above, the following information applies to the financial aid data of enrolled students:

- The College will collect, use, store, and transfer student financial aid data. Student education records are subject to the College's FERPA Policy. The College uses student aid data to fulfill contractual obligations related to providing eligible funding, and to fulfill obligations established by any applicable law.
- To the extent that we engage in financial activities, such as processing student loans, or payment information, we are in compliance with the Gramm-Leach-Bliley Act.
- Students applying for and receiving certain types of aid are required to provide sensitive personally identifiable information, such as legal name, date of birth, Social Security number, and financial data. If provided, this information is used to identify and communicate specific programming interests; fulfill legal requirements; for reporting purposes; and/or for research purposes. By sharing this information, students consent to the College using the data for these purposes. This information is retained for a period of ten years.

Personal Data of Alumni, Donor and Friends of the College

Westminster maintains personal information about alumni, employees, donors, and friends of the College in the database of record. Depending on the responsibilities of a College employee, this information may be visible to staff members. Contact information may be shared with volunteers or student employees for the purposes of outreach regarding gatherings, College-related fundraising activities, or networking opportunities. The College outlines privacy expectations with all staff and student employees, as well as volunteers, and requires that information be used for the described purpose only. You may make changes to communication preferences by contacting the Office of Alumni Engagement at alumni@westminster.edu or 724-946-7363.

In addition to the general privacy provisions above, the following information applies to the personal data of alumni, donors, and friends of the College:

Personal Information We Collect

The College may collect, use, store, and transfer the following personal information:

1. Biographical and contact information - addresses, phone numbers, email addresses, and social media contact information
2. Demographic information - names, gender, birth, and death dates, photograph, religious affiliation, and ethnicity (solely if you choose to provide religious affiliation and ethnic information)
3. Student information obtained from Westminster College records - degrees, majors, sports participation, awards, clubs, and activities
4. Employment information - company names, job titles, and industry information
5. Family information - spouse/partner names, children's names and birth dates, and familial relationships
6. Alumni information - event attendance, volunteer interests, organization affiliations, committee participation, awards, and honors

7. Donor information - giving information regarding any donation which is made, including wealth assessment, estate planning information, and indicators of your interest in giving
8. Analytical information - aggregated information related to web visitor activity, social media activity, and email marketing actions

How We Use Personal Information

We use your personal information in support of Westminster College and its mission. Specifically, we use your personal information to:

1. Keep you updated with information about Westminster College
2. Provide alumni services
3. Fundraise for Westminster College
4. Send you information about events and volunteer activities
5. Perform administrative tasks and for internal record keeping purposes

Job Applicant Data

In addition to the general privacy provisions above, the following information applies to the personal data of job applicants:

- An application submitted by a job applicant for a specific position becomes part of the recruitment file for that position. The College will use the application information only for consideration of the applicant's candidacy for each specific position for which it is submitted. For this purpose, the College will distribute the information to persons and parties affiliated with the search. The application is not searchable or viewable by other employers or recruiters, and the College does not sell the application to any third party.
- Personal data provided by job applicants during the application process is used by the College to process the application for employment at Westminster College, and are therefore used in the performance of related services to be provided to the job applicant.
- In accordance with the College's Document Retention and Disposition Policy, search materials are retained for 3 years, at which time they will be shredded or destroyed.

Employee Data

In addition to the general privacy provisions above, the following information applies to the personal data of College employees:

- The College may collect, use, store, and transfer employee data. Employee files are considered the property of the College. The College uses employee data to fulfill contractual obligations related to employment, and to fulfill obligations established by any applicable law.
- Employees may, but are not required, to provide sensitive data, such as race and ethnic origin. If voluntarily shared, this information could be used to identify and communicate specific programming interests, for reporting purposes, and/or for research and internal auditing purposes. By sharing this information voluntarily, employees consent to the College using the data for these purposes.
- During the course of employment, College staff may have access to Protected Health Information (PHI) as necessary to process benefits and fulfill contractual obligations

related to employment. Any PHI, whether oral, written, photographic, or electronic, shall be maintained in a manner that ensures its privacy and security.

All employees are advised that background checks are a condition of employment with the College, as set forth in PA Act 153 of 2014.

Employee, Volunteer, Enrolled Student, and Alumni Email Opt Out

Email opt out is not available for ‘All Campus’ emails. However, this privacy feature is available for all marketing emails from the College. There is also a link on all marketing emails that allows you to customize your communications preferences. You may opt out of some or all marketing communications from the College. If you opt out of all marketing email communications, your email address will not be shared with alumni volunteers or student callers. If you wish to opt back in, due to federal law, you are required to personally manage your email preferences.

Westminster College Policy Approval Workflow			
	Approved	Edits Needed	Review Date
Security Compliance Policy Group	<input checked="" type="checkbox"/>	<input type="checkbox"/>	11/19/2020
Data Managers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	12/04/2020
CIO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2/5/2021
Leadership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3/16/2021
Legal	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3/22/021
CIO (after edits)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3/31/2022