

# UWF Division of Continuing Education

## EU General Data Protection Regulation Privacy Notice

This is the University of West Florida's (UWF) Division of Continuing Education's privacy and legal notice for compliance with the European Union General Data Protection Regulation ("EU GDPR"). For more information regarding the EU GDPR, please review: <https://www.eugdpr.org/>, UWF's EU GDPR Privacy Notice at <https://www.uwf.edu/offices/general-counsel/GDPR>, and <https://uwf.edu/go/legal-andconsumer-info/general-data-protection-regulation-gdpr>

UWF is an institute of higher education involved in education, research, and community development. In order for UWF to register students for courses and events, certify loan applications, report grades to MyCAA, confirm the cost, enrollment and attendance to loan providers, review and process applications for admission, coordinate study abroad programs, coordinate distance learning courses, review and process applications for employment, it must collect, use and process this personal data.

The lawful basis for the collection and processing of personal data by UWF's Division of Continuing Education falls under the following categories:

- Processing is necessary for the purposes of the legitimate interests pursued by UWF or third parties in providing education; employment; certification of enrollment and attendance for financial payment plans and community programs.
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

### Types of Personal Data collected and why

In order for UWF's Division of Continuing Education to provide the course and event registration, and confirmation of enrollment and attendance, it needs to collect the following categories of personal data:

- Name
- Contact information including, without limitation, email address, physical address, phone number, and other location data
- Unique personal identifiers and biographical information (e.g. date of birth)
- Loan Certification and Reporting
- Confirmation of Enrollment
- Medical information including, without limitation, immunization records
- Financial information gathered for the purposes of administering fees and charges, loans, grants, scholarships, etc.

The personal data collected by UWF's Division of Continuing Education will be shared as follows:

UWF Unit	Purpose
Name	Registration
Contact Information	Communication
Unique Personal UWF ID	Registration and Enrollment Tracking
Student Enrollment Status	Enrollment Tracking
Grades	Application and Enrollment

Test Scores	Application and Enrollment
Financial Information	Loan Certification and Payment Plans
Degree Program	Enrollment Tracking, Application and Enrollment Status

<b>Third-Party Name</b>	<b>Purpose</b>
Cengage/Ed2go	Enrollment
Career Educational Services	Enrollment, Loan Applications, Internships
RegOnline	Registration
Augusoft Lumens	Registration
Active Network	Registration
Emma	Customer Database for Marketing Purposes
Grail	Enrollment, Test Scores
Ivy	Enrollment
The Learning House	Enrollment
Institute for Reading	Enrollment
Instructional Connections	Employment
GlobalizEdu	Enrollment
TeacherReady	Enrollment, Internships
MyCAA	Financial Plan Certifications
ELM One	Loan Certifications
Academic Partnerships	Enrollment, Student Application and Enrollment Status
CareerSource EscaRosa	Enrollment, Financial Plans
CareerSource Okaloosa Walton	Enrollment, Financial Plans
Michael Maloney	Enrollment

If you have specific questions regarding the collection and use of your personal data, please contact Matthew Packard, UWF Data Protection Officer, Office of Compliance and Ethics at [eugdpr@uwf.edu](mailto:eugdpr@uwf.edu)

If a data subject refuses to provide personal data that is required by UWF in connection with one of UWF's lawful bases to collect such personal data, such refusal may make it impossible for UWF to provide education, employment, research or other requested services.

### **Where UWF gets Personal Data and Special Categories of Sensitive Personal Data**

UWF receives personal data and special categories of sensitive personal data from multiple sources. Most often, UWF gets this data directly from the data subject or under the direction of the data subject who has provided it to a third party (for example, application for undergraduate admission to UWF through use of the Common App).

### **Individual Rights of the Data Subject under the EU GDPR**

Individual data subjects covered by the EU GDPR will be afforded the following rights at UWF:

- a) information about the controller collecting the data
- b) the data protection officer contact information
- c) the purposes and legal basis/legitimate interests of the data collection/processing
- d) recipients of the personal data
- e) if UWF intends to transfer personal data to another country or international organization

- f) the period the personal data will be stored
- g) the existence of the right to access, rectify incorrect data or erase personal data, restrict or object to processing, and the right to data portability
- h) the existence of the right to withdraw consent at any time
- i) the right to lodge a complaint with a supervisory authority (established in the EU)
- j) why the personal data are required, and possible consequences of the failure to provide the data
- k) the existence of automated decision-making, including profiling
- l) if the collected data are going to be further processed for a purpose other than that for which it was collected

**Note: Exercising of these rights is a guarantee to be afforded a process and not the guarantee of an outcome.**

Any data subject who wishes to exercise any of the above-mentioned rights may do so by filling such request with Matthew Packard, UWF Data Protection Officer, Office of Compliance and Ethics at [eugdpr@uwf.edu](mailto:eugdpr@uwf.edu)

### **Cookies**

Cookies are files that many websites transfer to users' web browsers to enable the site to deliver personalized services or to provide persistent authentication. The information contained in a cookie typically includes information collected automatically by the web server and/or information provided voluntarily by the user. Our website uses persistent cookies in conjunction with a third party technology partner to analyze search engine usage and web traffic patterns. This information is used in the aggregate to monitor and enhance our web pages. It is not used to track the usage patterns of individual users.

### **Security of Personal Data subject to the EU GDPR**

All personal data and special categories of sensitive personal data collected or processed by UWF must comply with the security controls, systems and process requirements and standards of UWF Policy IT04.01-03, University of West Florida Information Security and Privacy Policy.

### **Florida Public Records Law**

As a state university, UWF is subject to the provisions of the Florida Public Records Law, as outlined in Chapter 119, Florida Statutes. Except those records that are exempt from disclosure under the Florida Public Records Law, the law provides that all citizens are entitled to view the records of state agencies on request and to make copies for a fee. For more information on UWF's obligations under the Florida Public Records Law, please see UWF Policy GC-01.04-05/18.

### **Data Retention**

Please be informed that:

1. The period for which your personal data will be stored will be from now until no longer needed for compliance with U.S and Florida laws.

2. You can withdraw your consent, if granted, at any time and even only orally, but this will not affect the lawfulness of processing your personal data based on your consent before withdrawal.
3. You have legal rights and remedies against any breach of your personal privacy according to articles 77 to 84 of the EU GDPR.

UWF keeps the data it collects for the time periods specified in UWF Policy FIN 03.02-02.14, Records Management, as required under Florida Law.

**\*\*\*DISCLAIMER:** The University of West Florida's (UWF) Division of Continuing Education may make amendments to this notice from time to time without prior notice by posting the revised notice to this site. The most recent version will be the most recent date in the *History* provided below.

*History: November 21,2019*