

## **UWF Division of Continuing Education**

### **Privacy Notice and EU General Data Protection Regulation**

This is the University of West Florida's ("UWF" or "University") Division of Continuing Education's privacy and legal notice for its website and for compliance with the European Union General Data Protection Regulation ("EU GDPR"). Pursuant to the EU GDPR and other international personal data privacy laws, the University in its capacity as a data controller (as defined under the EU GDPR), must obtain your explicit, affirmative consent before it can collect or process any special categories of sensitive personal data for a lawful basis, including, but not limited to: admission, enrollment, online education, distance learning education, continuing education, etc.

For information on how UWF uses data, please review the UWF EU GDPR Privacy Notice at: <https://uwf.edu/go/legal-and-consumer-info/eu-gdpr-privacy-notice/> and <https://uwf.edu/go/legal-and-consumer-info/general-data-protection-regulation-gdpr/>

UWF is an institute of higher education involved in education, research, and community development. The personal data we collect, or on our behalf, is collected for the primary purpose of providing online education courses and programs, and, if applicable, evaluating qualifications for online education certificates or credit.

Personal data that is collected from you and processed will be for the University's legitimate educational interests including: a) Providing academic services to you and other Institutional purposes connected or related to the educational activities carried out by UWF; b) To address any concerns or feedback you may have; c) For any other purpose for which you provide us with your personal data; d) The performance of contractual obligations of UWF in connection with academic services provided to you, this may include communication with partnering school or others; e) To monitor and evaluate the performance and effectiveness of the University; f) Provide other administrative functions, such as: carrying out research and statistical analysis, preventing and detecting crime, dealing with grievances and disciplinary actions, dealing with complaints and inquiries, providing operational information; g) reporting requirements including reporting to student's funding sources; and including but not limited to, h) The University's compliance and regulatory obligations. UWF does not sell or disclose personal information for financial gain.

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
- Financial information gathered for the purposes of administering fees and charges, loans, grants, scholarships, etc.
- Employment information for the purpose of reporting to funding agencies for students
- Military Status and/or Branch for the purpose of military funding programs

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

<b>UWF Unit</b>	<b>Purpose</b>
Name	Registration
Contact Information	Communication
Unique Personal UWF ID	Registration and Enrollment Tracking
Social Security Number	Registration and Financial Plans
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
Emma	Customer Database for Marketing Purposes
Ivy	Enrollment
Risepoint	Enrollment
Institute for Reading Development	Enrollment
MyCAA	Financial Plan Certifications, Student Outcome Data
ELM One	Loan Certifications
CareerSource EscaRosa	Enrollment, Financial Plans, Student Outcome Data
CareerSource Okaloosa Walton	Enrollment, Financial Plans, Student Outcome Data
CampBrain	Registration
Children's Home Society	Enrollment
Xenegrade Corp.	Registration
ArmyCA	Enrollment, Financial Plans, Student Outcome Data
AFCool	Enrollment, Financial Plans, Student Outcome Data
The Center for Legal Studies (CLS) by Barbri	Registration
SallieMae	Loan Certification
SoFi	Loan Certification
College Ave	Loan Certification
PNC Loans	Loan Certification
Florida Department of Education Vocational Rehabilitation	Enrollment, Financial Plans, Student Outcome Data

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 [egdp@uwf.edu](mailto:egdp@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 IT04.02-11/18, UWF 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-01.05-09/23.

### **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.

### **Links to Other Websites**

This site may contain links to other websites. We are not responsible for the privacy practices of these other sites. We encourage you to read the privacy statement of other sites for assurance that their practices safeguard your privacy.

**\*\*\*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; November 18, 2024*