

PRIVACY NOTICE

Southwestern Adventist University is committed to respecting the privacy of information and data that may be used to identify you (your “personal information”). This Privacy Notice describes our policies and practices regarding the most common ways we collect, use, disclose, or otherwise process your personal information. In certain circumstances, we may provide you with supplemental disclosures regarding our data processing activities.

I. POTENTIAL STUDENTS

Personal Information We Collect

Southwestern Adventist University collects and uses personal information about applicants and other prospective students. If you are, or have been an applicant, we may collect and use the following types of personal information about you:

- Information and supporting documentation that you provide in your application, including verification of identity and/or any other information needed to process the application
- Related application materials (e.g. recommendations, references, and test scores)
- Information that you have permitted a third party, such as The College Board, to release (e.g. AP or SAT scores, demographic information, academic information)
- Contact information for prospective students that we receive from other institutions and from vendors (e.g. Niche, or college search engines the University subscribes to).
- Financial information, including financial information about your family members (e.g. information collected in connection with applications for financial aid, loans, and scholarships)
- Survey responses (if you choose to respond to a survey sent by us or on our behalf)

How We Use Your Personal Information

Your personal information is used primarily to evaluate your application and related activities, such as evaluating requests for financial aid, communicating with you about your application, and other administrative functions related to the admissions and enrollment process. We may also use or disclose your statistical information for the following purposes:

- To consider requests for accommodations
- For research and statistical purposes
- To provide you with information about Southwestern Adventist University and events that you might be interested in attending
- To send surveys for research purposes
- For compliance with legal obligations, to respond to subpoenas, court orders, or other legal process, and to enforce our agreements
- To prevent or investigate fraud or other unlawful activity, and to protect the security of Southwestern Adventist University's property, website, and other systems
- To meet the obligations of private organizations with oversight over Southwestern Adventist University, such as accreditation organizations
- To protect the health, safety, or rights of you, other students, faculty, staff, and visitors

How We Share Your Information

We may share your information with the following individuals and entities:

- Individuals who assist in the application process, such as faculty and/or outside consultants
- Other departments within Southwestern Adventist University
- Your financial institutions and funders (e.g. as necessary for obtaining loans, scholarships, or other funding)
- Governmental bodies as necessary for compliance with law, with law enforcement authorities when necessary, and other third parties to enforce our legal rights
- Private organizations with oversight over Southwestern Adventist University, such as accreditation organizations (They will be provided with statistical information only).

II. STUDENTS, FACULTY, & STAFF

Personal Information We Collect

When you are a student at Southwestern Adventist University, or a member or prospective member of the faculty and staff, we maintain records containing your personal information. We may collect and use the following types of personal information about you, as applicable:

- Your contact information and biographical data (e.g. name, address, date of birth, race, ethnicity)
- Application materials and supporting documents (e.g. applications for admission or employment)
- Copies of identification documents and other official documents (e.g. driver's license, I-9 form, passport/visa information)
- Employment and/or educational records (e.g. job history, job reviews, transcript information)
- Academic work product and related information (e.g. research and course-related content)
- Records about your other activities (e.g. involvement in clubs, disciplinary actions and similar incidents)
- Financial information (e.g. payroll information, information related to tuition payments)
- Student health records (Most health information about students is stored in the records of Southwestern Adventist University Campus/Heath Services for the purpose of providing you with health care and counseling services. Please refer to the University's Student Handbook for additional information regarding the use and disclosure of health information in connection with Southwestern Adventist University's Student Services.)
- Information about technology usage (e.g. IP addresses, software downloads for faculty and staff only)

How We Use Your Personal Information

We use this information for the following purposes as applicable:

- To provide educational, employment and/or related services (e.g. maintaining relevant records of your studies or employment, providing you with access to facilities and support services, such as counseling and IT services)
- To administer the financial aspects of the relationship (e.g. payroll, collecting tuition, coordinating with lenders or other funders)
- To enable your participation at events and in other opportunities (e.g. graduation, study abroad programs, internships)

- To protect the educational integrity of the school (e.g. disciplinary actions)
- To accommodate special needs (e.g. disability accommodations)
- For research and statistical purposes related to our educational and/or other services
- To provide basic contact information in student, faculty, and/or staff directories
- For the general operations of Southwestern Adventist University and related administrative functions
- For compliance with legal obligations, to respond to subpoenas, court orders, or other legal process, and to enforce our agreements
- To prevent or investigate fraud or other unlawful activity, and to protect the security of the University's property, website, and other systems
- To meet the obligations of private organizations with oversight over the University, such as accreditation organizations
- To protect the health, safety, or rights of you, other students, faculty, staff, and visitors

How We Share Your Personal Information

We may share your personal information with the following:

- Faculty and staff at Southwestern Adventist University in order to fulfill their responsibilities (for students only).
- Your lenders, funders, and/or other sponsors (for students only).
- Providers of any external program, such as study abroad programs, internships, and other collaborations
- Student clubs and related organizations
- Individuals or entities inquiring about your attendance or employment history
- Vendors who provide services to Southwestern Adventist University (for faculty and staff only e.g. retirement planning).
- Governmental bodies as necessary for compliance with law, with law enforcement authorities when necessary, and other third parties to enforce our legal rights
- Private organizations with oversight over the University, such as accreditation organizations

III. ALUMNI & OTHER SUPPORTERS

Personal Information We Collect

Southwestern Adventist University holds personal information related to its alumni and other supporters (such as donors, prospective donors, volunteers, and family members of students). If you are an alumni or other supporter, we may collect and use the following types of personal information about you:

- Academic information (e.g. major, transcript, degree)
- Biographical information (e.g. name, date of birth)
- Contact information (e.g. email address, phone number)
- Your activities at Southwestern Adventist University (e.g. club memberships)
- Family information (e.g. marital status, name of spouse)
- Financial information (e.g. history of donations, wealth information)
- Employment information

We collect data about alumni and other supporters from various sources, including directly from the individual (for example, by filling out a form on our website). We also retain information from your student records if you studied here. We also collect information from publicly available sources, such as social media.

How We Use Your Personal Information

Your personal information is used for the following purposes:

- Sending you informational publications.
- Conducting surveys so that we can learn more about our alumni and other supporters
- Sending you information about fundraising campaigns, events, and volunteer opportunities that may be of interest to you
- For administrative purposes (*e.g.* processing donations, issuing a tax receipts, and managing events, such as reunions)
- For research and statistical purposes
- To publicly acknowledge gifts (with consent of the donor)
- For compliance with legal obligations, to respond to subpoenas, court orders, or other legal process, and to enforce our agreements
- To prevent or investigate fraud or other unlawful activity, and to protect the security of Southwestern Adventist University's property, website, and other systems
- To meet the obligations of private organizations with oversight over Southwestern Adventist University, such as accreditation organizations
- To protect the health, safety, or rights of you, other students, faculty, staff, and visitors

How We Share Your Personal Information

We share your personal information with the following:

- Southwestern Adventist University departments, clubs, and/or interest groups
- Other University alumni (limited contact information only)
- The Southwestern Adventist University Alumni Association, specific alumni clubs and organizations and similar affiliates
- Vendors who provide services to Southwestern Adventist University
- Governmental bodies as necessary for compliance with law, with law enforcement authorities when necessary, and other third parties to enforce our legal rights
- Private organizations with oversight over Southwestern Adventist University, such as accreditation organizations

IV. WEBSITE VISITORS

Personal Information We Collect

The Southwestern Adventist University website is an information system intended to present an integrated view of the University to prospective students, alumni, the members of the local community, and any other individual with an interest in the University. If you visit this site to view and/or download information, or submit information to us, we may automatically collect the following types of personal information:

- the name of the domain from which you access the Internet
- the date and time of your visit
- the page/s you visit
- your computing platform

Some of this information may be collected through the use of cookies, which are text files that are placed on your hard disk by a web server, or similar technologies, such as web beacons. Some of these cookies are managed by third parties that we do not control, such as Google Analytics. You have the ability to accept or decline cookies by changing your browser settings. If you choose to decline cookies, some features on this website may not work properly.

If you use our website to complete forms, use our applications, or submit information to us (such as through our alumni and supplier registration pages), we will collect the information that you provide to us, as well as related information such as your login ID.

The Website contains links to third party websites that are not owned or controlled by Southwestern Adventist University. Southwestern has no control over, and assumes no responsibility for, the content, privacy policies, or practices of any third party websites. By using the Website, you expressly relieve Southwestern from any and all liability arising from your use of any third party website. Accordingly, Southwestern encourages you to be aware when you leave the Website and to read the terms and conditions and privacy policy of each other website that you visit.

How We Use Your Personal Information

The data collected with cookies and similar technologies are used in the aggregate for purposes of analyzing site traffic, managing the site, and providing accountability regarding the usefulness of our work.

If you provide us with information (such as through our alumni and supplier registration pages), we will use that information for the purposes described on the form or registration pages.

We may also use your personal information for the following purposes:

- For compliance with legal obligations, to respond to subpoenas, court orders, or other legal process, and to enforce our agreements
- To prevent or investigate fraud or other unlawful activity, and to protect the security of Southwestern Adventist University's property, website, and other systems
- To meet the obligations of private organizations with oversight over Southwestern Adventist University, such as accreditation organizations
- To protect the health, safety, or rights of you, other students, faculty, staff, and visitors

How We Share Your Personal Information

Personal information collected automatically on this website is not disclosed to third parties unless the third party is an institutionally authorized provider of services to the University. Information collected through website forms is used as specified on the form or as otherwise described in this notice.

This website may contain links to sites that are beyond our control. Southwestern Adventist University is not responsible for the privacy practices or content of these sites. Users of these services are subject to the privacy policies established by the third-party provider.

V. KJRN PATRONS, DONORS, & OTHER SUPPORTERS

Personal Information We Collect

Southwestern Adventist University through its on campus radio station KJRN holds personal information related to its donors, patrons, and other supporters. If you are a supporter of the radio station, we may collect and use the following types of personal information about you:

- Biographical information (e.g. name, date of birth, ethnicity, sexual orientation, religious affiliation)
- Contact information (e.g. email address, phone number)
- Your involvement with Southwestern Adventist University through KJRN
- Family information (e.g. marital status, name of spouse)
- Financial information (e.g. history of donations, wealth information)
- Employment information

We collect data about our supporters from various sources, including directly from the individual (for example, by filling out a form on our website). We also collect information from publicly available sources, such as social media, and from third parties, such as companies that conduct wealth screening or other people that might know you and your philanthropic interests.

How We Use Your Personal Information

Your personal information is used for the following purposes:

- Sending you informational publications about the radio station, such as newsletters and emails
- Conducting surveys so that we can learn more about our supporters
- Sending you information about fundraising campaigns, events, and volunteer opportunities that may be of interest to you
- Conducting wealth analysis and research to understand your philanthropic interests and ability to give in order to ensure that our fundraising efforts are tailored to your interests
- For administrative purposes (e.g. processing donations and issuing a tax receipt, managing events, such as reunions)
- For research and statistical purposes
- To publicly acknowledge gifts (with consent of the donor)
- For compliance with legal obligations, to respond to subpoenas, court orders, or other legal process, and to enforce our agreements
- To prevent or investigate fraud or other unlawful activity, and to protect the security of Southwestern Adventist University's property, website, and other systems

How We Share Your Personal Information

KJRN does not share your personal information with anyone or entity outside of KJRN with the exception of the following:

- Vendors who provide services to KJRN

- Governmental bodies as necessary for compliance with law, with law enforcement authorities when necessary, and other third parties to enforce our legal rights

VI. TRANSFER OF INFORMATION TO THE UNITED STATES

Southwestern Adventist University is located in the United States. Information we collect from you will be processed by Southwestern Adventist University in the United States. Southwestern Adventist University may also transfer your personal information to third parties, including our vendors, as described in this notice that may be located outside of the European Economic Area (“EEA”).

The United States has not sought nor received a finding of “adequacy” from the EEA, which means that the data protection laws in the United States may not offer you the same protections as in the country in which you are residing when the personal information is collected. With respect to transfers outside the EEA, Southwestern Adventist University generally relies on derogations for specific situations. In some circumstances, Southwestern Adventist University may enter into standard contractual clauses governing the import or export of personal information, or rely on your consent. In all cases, Southwestern Adventist University endeavors to apply suitable safeguards to protect the privacy and security of your personal information, particularly sensitive data, and to use it in a manner that is consistent with this Privacy Notice.

VII. RETENTION OF DATA

Southwestern Adventist University retains personal information about students and alumni indefinitely for the purpose of alumni relationships, academic record-keeping, and archiving purposes. Other personal information will be retained in accordance with applicable Southwestern Adventist University data retention policies.

VIII. COMMUNICATIONS FROM SOUTHWESTERN ADVENTIST UNIVERSITY

Southwestern Adventist University and the Southwestern Adventist University Alumni Association periodically send marketing communications to alumni, supporters, and other members of the Adventist community, such as newsletters, event invitations, and fundraising information. If you would like to request that Southwestern Adventist University or the Southwestern Adventist University Alumni Association limit or stop these marketing communications with you, please contact us at Privacy@swau.edu. If you request to be removed from our mailing lists, we will retain your contact information to ensure that we do not continue to contact you for these purposes. If applicable, we will also continue to process your personal information for other purposes consistent with this Privacy Notice.

IX. INDIVIDUAL RIGHTS

If you are located in the EEA, you may have the following legal rights under applicable law with respect to the personal information processed by Southwestern Adventist University:

- To withdraw consent at any time, if we are processing your personal information on the basis of consent
- To access the information that Southwestern Adventist University has about you
- To request that Southwestern Adventist University rectify or erase your information
- To request that Southwestern Adventist University restrict the way it uses your information
- To object to the way Southwestern Adventist University uses your information
- To ask Southwestern Adventist University to transfer your information to someone else
- To lodge a complaint with a data protection authority in the EEA



Southwestern Adventist University's ability or obligation to comply with your requests may be limited by applicable law.

To request to exercise one of these rights, please contact us at Privacy@swau.edu.

Changes to this Privacy Notice

Southwestern Adventist University reserves the right to amend this Privacy Notice at any time, for any reason, without notice to you. Any changes will be published here and you should check our website to access our current Privacy Notice. This Privacy Notice was last updated on March 5, 2019.

Contact Information

The controller of the personal information described in this Privacy Notice is:

Human Resources

100 W. Hillcrest Street

Keene, TX 76059