



# UNIVERSITY OF GUAM PRIVACY POLICY DRAFT

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The University of Guam (UOG) is dedicated to the fair and proper management and protection of information gathered, utilized, and maintained to support its academic, research, and clinical missions. Additionally, we are committed to ensuring transparency in our data management practices. UOG respects the integrity of all its stakeholders, including as represented by personally identifying information about each stakeholder, and takes seriously its responsibility to protect individuals' privacy in balance with meeting its legal, policy and administrative obligations. We seek to minimize the information we collect, limit access to that information and apply appropriate security measures to protect against loss, improper modification, or disclosure.

The University of Guam Privacy Policy applies to activities conducted by UOG and its direct affiliates and is intended to provide an overview of university privacy practices, including but not limited to categories of personal data processed, collection practices and transfer of personal data. [Some individual UOG websites may have their own privacy notices or additional privacy statements that supplement this Privacy Policy.] Additionally, some UOG websites may contain links to external websites not owned or controlled by UOG. UOG is not responsible for the privacy practices or content of such websites.

By using UOG systems, services, and website or submitting information to UOG, you are consenting to our collection and use of information in accordance with UOG policies for UOG's legitimate business purposes or as needed to provide services you request from UOG. For more information on cookies and website analytics used on UOG websites, please see the [UOG Website Privacy Policy](#).

## Contact Information

If you have questions about the University of Guam's privacy statement, please contact [privacy@uog.edu](mailto:privacy@uog.edu).

## PRIVACY STATEMENT - UPDATED AUGUST 18, 2023

### Introduction

This Privacy Statement describes how UOG and its schools, centers, institutes, and other units and controlled affiliates (collectively, "we" or "UOG") collect and process Personal Information that we gather in any hard copy or electronic manner that is owned and operated by, or in the possession or control of, UOG and that links to or references this Privacy Statement (collectively, the "Activities").

Some individual UOG websites may have their own privacy notices or additional privacy statements that may supersede or supplement this Privacy Statement when appropriate.

Please read this Privacy Statement carefully. By engaging with our Activities, you consent to the information practices and other terms set forth in this Privacy Statement.

### How We Collect and Use Personal Information

"Personal Information" means information that can be used to identify you as a person. We collect several categories of Personal Information through our Activities, including information you provide, information collected automatically, and information obtained from third-party sources. We generally use the Personal Information that we collect to operate the various functions of this institution and provide Activities that may be available to you.

We rely on separate and overlapping bases to collect and process your Personal Information lawfully as more fully described in the Privacy Statement sub-sections below.

The ways in which we collect and process your information vary depending on the relationship between you and UOG, as well as the specific UOG function with which you interact. The Privacy Statement sub-sections contained herein are intended to describe in more detail our collection and use practices for a number of these relationships and functions.

## **Your Rights**

We process all Personal Information consistent with your rights, and in each case to the extent required by and in accordance with applicable law.

Upon request, you have the right to:

- Access details of your Personal Information that we hold.
- Rectify any of your Personal Information that is inaccurate.
- Limit the ways in which we use your Personal Information.
- Object to the processing of your Personal Information.
- Request the omission of your Personal Information from use cases other than required institutional function.
- Obtain a copy of your Personal Information in an easily accessible format.
- Withdraw your consent to our collecting, using, and sharing your Personal Information.

Please note that, in certain cases, we may have a lawful basis to continue to process your Personal Information after you have withdrawn consent, including when necessary to protect your health and safety. In addition, withdrawing your consent will not affect the lawfulness of our collecting, using, and sharing of your Personal Information up to the point in time that you withdrew your consent.

To submit a request to exercise these or other rights, please contact us as set forth in the Contact Information section in the About tab on this page. We will respond to your request within a reasonable time and in accordance with any deadlines imposed by law.

If you have any complaints regarding our privacy practices, we ask that you contact UOG Privacy, as set forth in the Contact Information section in the About tab on this page. You also have the right to lodge a complaint with your national data protection authority (i.e., supervisory authority).

## **Children**

Our Services do not address anyone under the age of 13. We do not knowingly collect personal identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

## **Uses of Personal Information**

In addition to the uses described herein, we may use your Personal Information for the following purposes to serve our legitimate interests, comply with legal obligations, fulfil a contract, or in some cases, in accordance with your consent.

- Conducting our operations, administering the Activities, and managing your accounts;
- Contacting you to respond to your requests or inquiries;

- Processing and completing your transactions including, as applicable, course registration, order confirmation, enrollment in academic groups or other programs, processing payments for online purchases and course registration, and delivering products or Activities;
- Providing you with newsletters, articles, service alerts or announcements, event invitations, and other information that we believe may be of interest to you;
- Providing you with promotional information, offers, and other information that are personally tailored to your interests;
- Conducting market research, surveys, and similar inquiries to help us understand trends and needs of our users;
- Providing for your health, safety, and security;
- Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Information, our website, or data systems; or to meet legal obligations;
- Enforcing our Terms of Use and other agreements; and
- Sending you text messages or push notifications when you sign up for one of our messaging programs. These messages may be sent by automated means. You may opt out of a text message program by contacting us.

## **Legitimate Interests**

We rely on several legitimate interests in processing your Personal Information. These interests include:

- Improving and customizing the Activities for you
- Understanding how the Activities are being used
- Obtaining insights into usage patterns of the Activities
- Exploring ways to develop and grow our operations
- Ensuring the safety and security of the Activities
- Conducting research and improving understanding in fields of public interest and health
- Enhancing protection against fraud, spam, harassment, intellectual property infringement, crime and security risks

## **How We Share and Disclose Personal Information**

We may share your Personal Information, consistent with this Privacy Statement, within our family of schools, centers, institutes, and other UOG entities and affiliates, with service providers and partners, and to comply with the law, protect health and safety and enforce our legal rights. We share your Personal Information with third parties only in the ways described in this Privacy Statement.

## **Service Providers and Professional Advisors**

We share your Personal Information with third-party service providers and professional advisors who complete transactions or perform or administer Activities on our behalf or for your benefit, such as:

- Educational Activities, including admissions, registration, evaluation, and alumni engagement
- Analytics and insights, including for marketing and research
- Employment Activities, including human resources
- Payment and donation processing

## **Partners**

We may share your Personal Information with our partners for the purposes of administering programs and Activities, including but not limited to:

- Cross-registration for courses with other universities
- Study abroad at foreign universities
- Online education offerings through online platforms
- Joint research arrangements with sponsors, other hospitals, and universities
- Events with clubs and special interest groups

## **Third-Party Mobile Application Providers**

With your knowledge and consent, the Activities may gather and transfer your Personal Information, including location information, from and to other applications, functions, and tools within your mobile device.

## **Social Media Platforms**

We may also use Activities provided by third parties (such as social media platforms) to serve targeted ads to you on third-party platforms. We may do this by providing a hashed version of your Personal Information to the third party for matching purposes.

## **Legal Process, Safety and Terms Enforcement**

We may disclose your Personal Information to legal or government regulatory authorities as required by applicable law. We may also disclose your Personal Information to third parties as required by applicable law including in connection with claims, disputes, or litigation or if we determine its disclosure is necessary to protect the health, safety, and security of you or us, or to enforce our legal rights or contractual commitments that you have made.

### **Information We Collect from Third-Party Sources**

We may collect certain Personal Information about you from third-party sources to administer our Activities. Third-party sources include partners and service providers, such as payment processors, application aggregators, analytics providers, third-party platforms using single sign-on, and other third-party sources, such as credit reference agencies and public databases.

## **Links to Third-Party Sites and social media**

The Activities may include links to websites and digital Activities operated by third parties, as well as “like” buttons and widgets hosted by other companies, that allow us to better understand website usage and communicate information to our users across multiple online platforms. UOG is not responsible for the content, privacy policies or data practices of third parties that collect your information. We encourage you to review the privacy policies for those third parties to learn about their information practices.

## **Internal Data Transfers**

UOG may transfer your Personal Information within our family of schools, centers, institutes, and other UOG entities and affiliates and/or to the third parties discussed above. In addition, your Personal Information may be transferred to,



stored, and processed in a country other than the one in which it was collected, in which case, we rely on appropriate and reasonable safeguards to protect your information in accordance with applicable data protection laws.

If your Personal Information was collected or stored in another country, we may transfer your Personal Information outside of that country, and when we do so, we rely on appropriate or suitable safeguards recognized under data protection laws, including, but not limited to, adequacy decisions, standard contractual clauses, your consent, or by contract.

## **Updates to the Privacy Statement**

This Privacy Statement is subject to occasional revision. If we make any material changes in the way we use your Personal Information, we will notify you by sending you an email to the last email address you provided to us and/or by prominently posting notice of the changes on the Activities and updating the effective date above.

## **ADDITIONAL CATEGORIES OF PERSONAL INFORMATION COLLECTED**

### **Admissions & Financial Aid**

Information collected by us, or on our behalf, during the admissions process and throughout any subsequent enrollment as a student at UOG is collected for the primary purpose of considering your application for admission to UOG, evaluating your eligibility for financial aid and, if you are admitted, facilitating your education. Aggregated data derived from this information may be utilized for statistical reporting. Personal Information collected for Admissions and Financial Aid includes:

- Contact Information
- Demographic Information
- Education, Testing, Personal, and Employment History
- Criminal Record
- Personal Financial Information
- Family Financial Information
- Identity documentation

The purposes of processing each category of Personal Information include responding to requests for information, communicating with you, and evaluating your eligibility for admission and financial aid.

Online communications guidelines adhere to the [UOG IT UPM](#).

UOG follows Family Educational Rights & Privacy Act (FERPA) and Health Insurance Portability and Accountability Act (HIPPA) guidelines when handling personal information in relation to enrollment.

### **Finance**

Your financial information is collected for the sole use of University of Guam operations and business transactions.

- Contact Information
- Identity documentation
- Identification Numbers
- Payment Information



- Tax Information
- Banking information
- Demographic Information

UOG follows Payment Card Industry (PCI) and Gramm Leach Bliley Act (GLBA) guidelines when handling information in relation to financial transactions.

## **Office of Information Technology**

Your information is collected for application use and system access accounts solely for University of Guam operations, ensuring data privacy, and security.

- Contact Information
- UOG Affiliations
- Identity documentation

UOG follows FERPA guidelines when handling personal information in relation to IT system access and application use.

## **Alumni**

The primary way UOG collects and maintains Personal Information about alumni is when you provide it to us, for example, when you update your alumni profile, connect with us on social media, or register to attend alumni events. We may also collect Personal Information from publicly available sources or third-party sources that support UOG or with whom UOG engages.

The main purpose for UOG's collection of alumni Personal Information is to connect you with UOG, other alumni, UOG students and potential students. Personal Information collected about alumni includes:

- Contact Information
- Demographic Information
- Employment Information
- UOG Affiliations
- Personal Information
- Family Information

The purposes of processing each category of Personal Information include responding to requests for information, communicating relevant information, and connecting you with alumni and students.

## **Donors**

UOG collects and maintains donor Personal Information to process donations and respond to comments and questions. We may also use donor information to keep you informed about UOG events and initiatives that may interest you.

The main way we collect donor Personal Information is when you provide it to us, for example, when you complete a donation form or request information regarding donations. We may also collect Personal Information from publicly available sources. Personal Information collected about donors includes:

- Contact Information



- Donation Information
- Payment Information

The purposes of processing by each category of Personal Information include to communicate with and provide information to you regarding donations and to process and confirm your donations.

More information on our donor privacy policy can be found on the UOG Endowment website here: <https://give.uog.edu/privacy-policy/>

## **Human Resources**

UOG collects your Personal Information when you apply for employment. Further Personal Information collection occurs at the commencement and throughout your employment at UOG.

Personal Information collected by UOG, or on our behalf, is collected for the primary purpose of providing employment or enabling authorized persons to utilize UOG's Services and facilities. Personal Information collected by Human Resources includes:

- Contact Information
- Demographic Information
- Payment Information
- Tax Information
- Employment History
- Education History
- Criminal Records
- Background Records
- Employee Health Information

The purposes of processing each category of Personal Information include providing you with employment-related notices, forms, and payments, and evaluating your application for employment.

UOG follows HIPPA guidelines when handling personal information in relation to employment.

## **Online Education**

UOG collects your Personal Information when you apply for online education offers. Further Personal Information collection occurs at the commencement of and throughout your online education interactions.

Personal Information collected by UOG, or on our behalf, is collected for the primary purpose of providing online education courses and, if applicable, evaluating qualification for online education certificates and credit. Personal Information collected through Online Education includes:

- Contact Information
- Payment Information
- Tax Information
- Employment History
- Education History



- Criminal Records
- Learner Interaction Data
- Course Assessment Data
- Log Files
- Location Information
- Identity documentation

The purposes of processing by each category of Personal Information include to communicate with you regarding your program, respond to requests, process payments, evaluate your application for online education, evaluate your success and engagement in Online Education, provide you with location-based services, and provide secure, remote online testing platforms.

## **Non-credit Education**

UOG collects your Personal Information when you are involved in non-credit, executive education and personal enrichment courses offered in person and online by UOG and our affiliates. Further Personal Information collection occurs at enrollment and throughout your non-credit education interactions.

Personal Information collected by UOG and our affiliates, or on our behalf, is collected for the primary purpose of providing non-credit education and ongoing communication. Personal Information collected through Non-credit Education includes:

- Contact Information
- Education History
- Assignment and Testing History
- Disability Information
- Dietary Information
- Residential Information
- Personal History
- Employment History
- Personal Financial Information
- Family Financial Information
- Payment Information
- Location Information
- Biometric Data

The purposes of processing by each category of Personal Information include to respond to requests for information, provide academic guidance and experiences, evaluate your eligibility for financial aid and courses, and provide secure online testing platforms.

## **Research**

UOG researchers and affiliates may collect, use and share your Personal Information as part of a research study in which you have consented to participate as a research subject or researcher or in which your existing personal data is used. Often, when personal information is collected for research purposes, you will be provided a consent and/or authorization form that explains the types of data collected and the purposes for which such data are processed, shared, protected,





and secured. In such case, the description of the collection and use of your Personal Information provided in the consent and/or authorization form will replace the information provided here.

Examples of data that may be collected for research purposes are listed below. These data categories are provided as examples only; not every research study will collect each of these categories of data. If you have questions about the processing of your data in connection with a research study, you should contact the UOG personnel who are conducting the research, or the contact persons named in any informed consent form you signed when you joined the study.

Examples of Personal Information collected through Research include:

- Contact Information
- Tax Information
- Family Information
- Employment History
- Education History
- Criminal Records
- Demographic Information
- Health Records
- Biometric Data
- Genetic Data
- Log Files

The purposes of processing by each category of Personal Information include to enroll you in a research study.

UOG follows FERPA and HIPPA guidelines when handling personal information in relation to research information gathering.

## **Students**

The information collected by us, or on our behalf, throughout your enrollment as a student at UOG is collected for the primary purpose of facilitating your education at UOG and providing the programs for which you are enrolled. Personal Information may also be utilized for quality improvement research and analysis to evaluate program utilization and performance to improve education quality. Personal Information collected as a result of your enrollment as a Student includes:

- Contact Information
- Demographic Information
- Student Academic Records
- Assignment and Testing History
- Health Records
- Disability Information
- Dietary Information
- Residential Information
- Personal History
- Employment History
- Criminal Record



- Personal Financial Information
- Family Financial Information

The purposes of processing by each category of Personal Information include to respond to requests for information, provide academic guidance, evaluate your eligibility as a student and for financial aid, and to provide a safe and secure experience as a student.

UOG follows FERPA and HIPPA guidelines when handling personal information in relation to enrollment.

## **Patients**

UOG Health and its affiliates may collect certain information to facilitate your becoming a patient for treatment. When you first present for care at a UOG Health facility, you will be provided a separate notice of privacy practices that explains in more detail the types of data collected and the purposes for which such data are processed and shared by UOG Health. This notice will be controlling regarding the data collected during the course of your treatment at UOG Health. If you have additional questions about the processing of your data in connection with your becoming a patient at UOG Health, you should contact the Data Protection Officer using the contact methods provided below in the Contact Us section. Examples of Personal Information that may be collected as a Patient include:

- Contact Information
- Health Records
- Family Information
- Insurance History
- Demographic Information
- Financial Information

The purposes of processing each category of Personal Information include providing you with medical care, processing insurance and payment, and communicating with you regarding your healthcare.

## **UOG Press Customers**

UOG Press collects and maintains Personal Information about purchasers of items to facilitate purchases and respond to your comments and questions. We may also use your information to keep you informed about UOG Press products that may interest you. Personal Information that may be collected as a UOG Press Customer includes:

- Contact Information
- Payment Information

More information on our UOG press policy can be found on the UOG press website here: <https://uogpress.com/privacy-policy/>