



# Alabama Community College System Privacy Notice v1.0

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Date – April 7, 2023

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# Alabama Community College System Privacy Notice

**Updated 4.7.23**

The Alabama Community College System (ACCS) values your privacy, and is committed to protecting your personal information. In this End User Privacy Notice (“Notice”), we describe how we collect, use, and share personal information about students and other payors (“End Users”).

ACCS is Alabama’s gateway to world-class, affordable education and technical training for the necessary skills to compete in a constantly evolving workforce. The system consists of 24 community and technical colleges. We work with both public and private schools and four-year universities to offer residents the education programs they need. We offer academic and career technical dual enrollment classes that allow high school students to earn college credit that saves valuable money and time towards a certificate or degree.

As part of the offerings provided by ACCS, we use commerce and credential solutions (“Services”) that enable us to offer End Users easy ways to engage with and manage their payment and billing relationship with our Member Institutions. End Users may access these Services through the Institutions’ websites, in mobile applications, and any other Institution service that relies on the Services where this Notice is posted. We may provide additional privacy notices as necessary that apply to your use of certain products. This Notice applies to these Services as provided by ACCS, on its own behalf or in combination with one of its affiliates, subsidiaries, or vendors.

## Information Collected and How it is used

When End Users interact with ACCS Services, we collect personal information in order to facilitate the services that the Institution is providing you.

If you are an End User who has a relationship with one of our Institutions such as a school or university and have a question about how your personal information is collected, used, or shared, or would like to exercise any rights you may have with respect to your personal information, please contact your Institution directly.

ACCS and its Member Institutions will only collect, use, and share personal information where we are satisfied that we have an appropriate legal basis to do so. Subject to consent if required by law, we may collect the following categories of End User information on behalf of and as directed by your Institution:

- **Identifiers** (such as name, contact information including telephone number, email address, or postal address)
- **Information protected against security breaches** (such as your name and financial account, username and password)
- **Protected characteristics** (like race, gender, ethnicity, etc.)
- **Commercial information** (such as products or services purchased, events attended, or other purchasing or consuming histories)
- **Internet/electronic activity** (see “Cookies” for additional information)
- **Geolocation data** (for the purpose of enabling location-based Services such as building access at your school or college)

- **Audio/Video Data** (such as such as call recordings if you receive customer service support over the phone)
- **Professional or employment related information** (such as your status with the organization with which you are affiliated)
- **Education information** including your status with the school or college with which you are affiliated (i.e. student, faculty, staff)
- **Biometrics**

### How we use your personal information

We use your personal information to provide the Services. In providing the Services, we may use your personal information for the following business purposes:

- Create, maintain or provide service for your account
- Process or fulfill requests from you
- Respond to customer service requests from you
- Verify your information
- Process payments
- Undertake activities to maintain the quality, safety or integrity of the Services
- Maintain data security including detecting and responding to security incidents and protecting you, and us, from fraud
- Monitor our Services including gathering usage data and other analytic information that enables us to maintain and improve the Services
- Other uses that are required for us to meet our legal, contractual or regulatory requirements, and
- Other uses as directed by your Institution and subject to their privacy policy

### Sources of personal information

We collect personal information from the following sources:

- **Information that you provide to us:** We collect personal information that you provide to us through your use of the Services. For example, we may collect personal information like your name, contact information, payment information, and enrollment status as part of the Services offering. Providing us with personal information about yourself is voluntary, and you can always choose not to provide certain information, but then you may not be able to take advantage of or participate in some of your Institution's services.
- **Information collected from third parties:** We may collect information about you from third parties as part of providing our Services to you. For example, we may collect personal information like your name, contact information and enrollment status from your university or Member Institution in order to offer the Services to you.
- **Information collected through technology:** When you visit our Sites or Apps or interact with an email we send to you, we may collect certain information automatically such as your

account or device identifier, and usage information such as pages that you visit, information about links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services. You have the ability to express your preference regarding some of the ways we collect information through technology in some of our Services (see “Cookies and Other Tracking Technologies” for more information). We may collect geolocation in the Apps for the purpose of enabling location-based Services.

**The legal basis for our processing your personal information.** Our legal basis for using your personal information includes (1) performance of a contract with your Institution so you can use the Services, (2) our legitimate interests which include Services improvement, better engagement with you, fraud prevention, and security our Services, and (3) to comply with a legal obligation (to keep information we are required to keep such as payment information), or (4) with your consent when required by applicable law.

**The business purpose for our processing your personal information.** Our primary business purpose for processing your personal information is to provide the Services consistent with the contract terms between us and your Institution. We may also use your personal information to enable the following additional business purposes: (1) detecting and managing security incidents or fraudulent activity, (2) providing customer service, fulfilling requests, and other functions directly related to the Services, (3) maintaining our software including debugging and repairing errors, and (4) maintaining the quality of the Services and developing enhancements and improvements to meet your Institution’s needs.

**Data anonymization and aggregation.** Subject to your consent if required by law, we may anonymize or aggregate your personal information in such a way as to ensure that you are not identified or identifiable from it, in order to use the anonymized or aggregated data. For example, we may use anonymized or aggregated data for statistical analysis including to analyze trends, for product development, and for risk assessments and cost analysis. We may share anonymized or aggregated data with our parents, subsidiaries, affiliates or with other third parties.

This Notice does not restrict ACCS’s use or sharing of any non-personal, summarized, derived, anonymized or aggregated information.

### How Personal Information is Shared

Except as otherwise specified, we may share any of the categories of your personal information in the manner and for the purposes described below:

- With ACCS affiliates where such disclosure is necessary to provide you with our Services or to manage our business.
- With third-party service providers. For example, we share personal information with IT and internet service providers who help manage our back office systems or administer our Services. These third-party service providers have agreed to confidentiality restrictions and have agreed to use any personal information we share with them, or which they collect on our behalf, solely for the purpose of providing the contracted service to us.

- With the Institution with whom you are also engaging when you use the Services. For example, you may be using a Service provided to you through a school or college website to engage in a purchase. ACCS may share the personal information you provide with the school in order to fulfill your request. You may also receive communications from the school.
- With banks and payment providers to authorize and complete payments.
- We may share identifiers with logistics service providers to enable the delivery of packages to individuals.
- As directed by the Institution with whom you are engaging with for the purpose of providing the Services.
- With other third parties with whom you direct us to share defined categories of your personal information.

ACCS does not sell your personal information to third parties for monetary compensation. We may also disclose personal information about you if we believe such disclosure is necessary to comply with laws or respond to lawful requests and legal process or to protect or defend the rights, safety or property of ACCS and/or its Member Institutions, users of the Services or any other person, including to enforce our agreements, policies and terms of use.

In addition, subject to applicable legal requirements, we may share personal information in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business assets to another company.

### Global Transfer of Personal Information

Some of the solutions supporting the Services operate globally. This means that your personal information may be transferred to and stored in the United States or in another country outside of the country in which you reside, which may be subject to different standards of data protection than your country of residence.

We will take appropriate steps to ensure that transfers of personal information are in accordance with applicable law, are carefully managed to protect your privacy rights and interests and limited to countries which are recognized as providing an adequate level of legal protection or where alternative adequate arrangements are in place to protect your privacy rights. To this end:

- we ensure transfers with our affiliates and vendors are covered by agreements which contractually requires each such entity to ensure that personal information receives an adequate and consistent level of protection wherever it is transferred;
- where we transfer your personal information outside of ACCS environments and/or to third parties who help provide our Services, we obtain contractual commitments from them to protect your personal information; and
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information are disclosed.

## How we Protect Personal Information (including Disposal)

We take our responsibility to protect the security and privacy of your personal information seriously. We maintain safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

Any suspected attempt to breach our policies and procedures, or to engage in any type of unauthorized action involving our information systems, is regarded as potential criminal activity. Suspected computer mischief may be reported to the appropriate authorities.

Please remember that communications over the internet like emails are not inherently secure. We seek to keep secure all confidential information and personal information submitted to us in accordance with our obligations under applicable laws and regulations. However, like all website operators, we cannot guarantee the security of any data transmitted through the internet.

When we no longer need your personal information to provide the Services, or to comply with a legal or regulatory obligation, it will be securely deleted, de-identified, or sanitized in a manner that ensures you cannot be re-identified.

## Cookies and other Tracking Technologies

A “cookie” is a text file that is stored to your browser when you visit a website. The cookies described below provide information about how ACCS and/or its vendors uses cookies in providing the Services.

Unique device identifiers like IP address or UDID recognize a visitor’s computer or other device used to access the internet. Unique device identifiers are used alone and in conjunction with cookies and other tracking technologies for the purpose of “remembering” computers or other devices used to access the Services. We may also use other technologies like pixels or tags that allow us to measure responses to our email communications.

Cookies can be classified by duration and by source:

- **Duration.** The Services use both “session” and “persistent” cookies. Session cookies are temporary - they terminate when you close your browser or otherwise end your “active” browsing session. Persistent cookies remember you on subsequent visits. Persistent cookies are not deleted when you close your browser, and they will remain on your computer or other device unless you choose to delete them.
- **Source.** Cookies can be “first-party” or “third-party” cookies, which means that they are either issued by or on behalf of ACCS and/or its vendors, or by a third-party operator of another website. For an example of a third-party cookie, our Services may contain a Facebook “like” button, which would set a cookie that can be read by Facebook. Our Services may use both first-party and third-party cookies.

The cookies that we may use with the Services fall into the following categories:

**Strictly Necessary Cookies.** These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions taken

by you such as logging in or filling in forms. You can set your browser to block or alert you about these cookies, but blocking them may impede the functionality of the Services on the website.

- **Performance Cookies.** These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.
- **Functionality Cookies.** These cookies enable our sites to provide enhanced functionality and personalization. They may be set by us or by third-party providers whose services we have added to our pages. If you do not allow these cookies then some of these services may not function properly.

### How to Delete or Block Cookies or Other Tracking Technologies

On some Services, when technically feasible, we will enable tools to help you make choices about cookies and other tracking technologies. You may also delete or block cookies at any time by changing your browser settings. You can click “Help” in the toolbar of your browser for instruction or review the cookie management guide produced by the Interactive Advertising Bureau available at [www.allaboutcookies.org](http://www.allaboutcookies.org). If you delete or block cookies, some features of the Services may not function properly.

### External Links

ACCS’s Services may include links to other websites that are not under our control. We do not endorse or make any warranty of any type regarding the content contained on such websites or products and services offered on those websites.

We encourage End Users to be aware when they leave our sites and to read the privacy statements of each and every website that collects personal information. This Notice applies solely to personal information collected by us. You should read any other applicable privacy and cookies notices carefully before accessing and using other websites.

### Your Legal Rights

If you are an End User who using ACCS Services and have questions about legal rights you may have with respect to your personal information collected by your Institution, please consult the Institution with which you have a relationship.

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, some of our End Users, including European Union residents and residents of the state of California, may have certain rights in relation to their personal information. If you have any questions about or wish to exercise any rights you may have under applicable law, please contact your Institution.



<b>EU Residential Rights</b>	<b>What does this mean?</b>
Right to be informed	You have the right to be provided with clear and easy-to-understand information about how we use your personal information. This is why we are providing you this Notice and we may provide other forms of notice, as appropriate or required by law, in the Services.
Right to access personal information	You have the right to access and receive a copy of personal information we hold about you.
Right to data portability	In some circumstances, you have the right to receive the personal information you request from us in a format that is user-friendly and enables you to transfer it to another provider.
Right to rectification	You have the right to correct or update your personal information if it is outdated, incorrect or incomplete.
Right of erasure (“right to be forgotten”)	In some circumstances, you have the right to have your personal information erased or deleted.
Right to restrict/suspend processing of personal information	You may object to processing of personal information that is based on legitimate interest. You may withdraw consent for processing that is based on consent (this includes the right to opt out of direct marketing).
Right to information about information transfers	You have the right to obtain a copy of documents related to the safeguards under which your personal information is transferred outside the EU.
Right to complain to a supervisory authority	You have the right to contact the data protection authority in your country to complain about our data protection and privacy practices.

<b>CA Resident Rights</b>	<b>What does this mean?</b>
Right to know about personal information collected, disclosed, and sold	You have the right to request that we disclose to you what categories of personal information we have collected, used, disclosed, or sold over the past 12 months. We have provided information about the categories of personal information we have collected, the sources from which we collected it, the purposes for which it was collected, and the third parties with whom we may share it with above.
Right to opt-out of the sale of personal information	You may request that we do not sell your personal information to third parties.
Right to request deletion	In some circumstances, you have the right to have your personal information erased or deleted.
Right to equal service and prices (“non-discrimination”)	Your choice to exercise your privacy rights will not be used as a basis to discriminate against you in Services offered or pricing.

## Other Information

### Changes and Updates.

We reserve the right, in our sole discretion, to modify, update, add to, discontinue, remove or otherwise change any portion of this Notice, in whole or in part, at any time. When we amend this Notice, we will revise the “Updated” date located at the top of the document. We will also take reasonable steps to ensure you are made aware of any material updates including providing your Institution with communication about such changes, or providing a notification through the Services, as appropriate. If you provide personal information to us, or access or use the Services after this Notice has been changed, you will be deemed to have unconditionally consented and agreed to such changes. The most current version of this Notice will be available on all End User facing Services, and will supersede all previous versions of this Notice.

### Choice of Law.

To the extent not prohibited by law, this Notice, including all revisions and amendments thereto, is governed by the laws of the United States, State of Alabama, without regard to its conflict or choice of law principles which would require application of the laws of another jurisdiction.

## Contact Us

If you are an End User who has a relationship with ACCS or one or more of its Member Institutions, and have a question about how your personal information is collected, used, or shared, or would like to exercise any rights you may have with respect to your personal information, please contact your Institution directly.