Privacy Policy

Approval Authority:	**Cabinet**
Responsible Officers:	**Vice President for Information Technology and Chief Information Officer, Chief Compliance Officer, Chief Information Security Officer**
Responsible Offices:	**Division of Information Technology, Office of Information Security & Division of Finance, Compliance Office**
Effective Date:	**May 10, 2023**

I. Purpose of this Policy

The purpose of this Policy is to outline the mechanisms by which Stevens Institute of Technology ("Stevens" or "the University") aims to (a) safeguard various types of information in keeping with University policies and state, federal and other laws and regulations and (b) protect and respect the legitimate privacy interests of its students, faculty and staff, and of visitors to Stevens and its website. This Policy cross-references and incorporates other related Stevens policies and sets out additional policy statements.

In administering this Policy and the others referenced herein, it is important to understand that all Stevens electronic communication, collection and storage mechanisms, systems and assets are the property of Stevens and should be used for Stevens purposes only.

II. Definitions

Personally Identifiable Information ("PII") is information that identifies an individual or relates to an identifiable individual, including, but not limited to name, postal address (including billing and shipping addresses), telephone number, email address, credit or debit card number, or other information that an individual voluntarily provides through the use of Stevens website or other information technology services or hard copies maintained by Stevens.

Services include Stevens website, applications and other information technology services maintained by Stevens.

III. Information Privacy

Stevens intends to limit the collection, use, disclosure, and storage of PII to that which reasonably serves Stevens academic, research and administrative functions and other legally required purposes.

A. Information Security

Stevens Information Security Policy sets forth guidelines and procedures to protect the confidentiality, integrity and availability of Stevens institutional data as well as systems that store, process or transmit such data. The Policy defines the roles and responsibilities of all members of the Stevens community who manage or have access to such data and systems and defines fundamental principles for the protection of institutional data and systems at Stevens.

In accordance with the Information Security Policy, the Division of Information Technology monitors Stevens information systems for malicious activity (e.g. viruses, malware), routes network traffic through an automated intrusion prevention system, and logs network activity. Division of Information Technology staff may access devices to perform maintenance, troubleshooting, or incident response; efforts will be made to coordinate and notify users in such cases. Additionally, Stevens reserves the right to review files or emails for legal, audit or regulatory compliance purposes.

B. Record Retention; Document Preservation and Legal Process

Stevens Policy on Record Retention sets forth the standards and procedures for the systematic review, retention and disposal of records received or created in the course of University operations. The Policy establishes the minimum amount of time a particular type of record must be retained, provides procedures for the proper and timely disposal of records and contemplates the proper disposal of records.

Stevens Policy on Document Preservation and Legal Process outlines Stevens obligations to preserve and produce relevant documents and information when litigation is threatened or filed against the University, or when the University is served with a summons, legal complaint, subpoena or a request from a government entity.

C. Student Data

Stevens Policy on Student Privacy Rights sets forth the requirements for Stevens compliance with the Family Educational Rights and Privacy Act of 1974 ("FERPA"). FERPA protects the privacy of students education records and affords students the right to control access to such records in certain circumstances while also permitting the University to disclose Directory Information (as defined in the Policy) and certain other information.

D. Research Data

Consistent with Stevens Human Subjects in Research Policy and federal law, all Stevens faculty, staff and students who propose to engage in any research activity involving human subjects must obtain approval from Stevens Institutional Review Board ("SIRB") prior to the initiation of the research. In determining whether to approve the research, the SIRB determines, among other things, whether there are adequate provisions in place to protect the privacy of human subjects and to maintain confidentiality of data at each stage of the research. Human subjects must be informed of the precautions that will be taken to protect the confidentiality of data and be informed of the parties who may have access to the data.

E. Financial Data

The Gramm Leach Bliley Act ("GLBA"), requires Stevens to protect the privacy and security of consumer financial information collected in the course of providing certain financial services, including the administration of student financial aid. Stevens maintains a GLBA information security plan to protect consumer financial information.

F. Data Protection Regulations

In recent years, various jurisdictions, including foreign jurisdictions, have promulgated data protection regulations which apply to varying constituencies at the University. Stevens is committed to protecting privacy consistent with these regulations and has developed processes and protocols where relevant.

IV. Web Privacy

A. Personally Identifiable Information

Stevens does not collect PII when visitors visit Stevens website unless the visitor voluntarily provides the information to Stevens through admission applications, subscriptions, web inquiry forms or other types of specific communications. Any PII that a visitor chooses to provide will only be used by Stevens to conduct Stevens business. Stevens does not sell, rent, loan or trade personal information collected on its website.

B. Non-Personally Identifiable Information

When visiting Stevens website, Stevens collects non-personally identifiable information including, but not limited to:

- The Internet Protocol address of the computer or mobile device that accessed Stevens.edu;
- The type of browser, its version and the operating system on which that browser is running;
- The web page from which the user accessed the current web page;
- The date and time of the user's request; and
- The pages that were visited and the amount of time spent at each page.

Stevens uses this information for internal purposes such as traffic analysis, site improvement and security.

Stevens uses tools such as Google AdWords and Google Display to remarket to users who visit Stevens website. Stevens and third-party vendors use pixel tags (i.e., small strings of code that provide a method for delivering a graphic image on a webpage) to obtain information about the computer being used to view a webpage, including such information as the time spent on the site, the user's operating system and browser type, demographic data and similar information.

Stevens website also utilizes "cookies" (i.e., small text files placed on the user's computer or mobile device to help track information about the user's browsing on the site). These cookies are used to recall a visitor's personal preferences, such as usernames and passwords, and to track statistics on usage of Stevens website.

Stevens uses "internet-based" or "behavioral" advertising, which is advertising that is tailored to a user's interests based on their activity online. Visitors may opt out of internet-based advertising by visiting the Network Advertising Initiative opt-out page.

V. Use of Services by Minors

Stevens Services are not directed to individuals under the age of thirteen (13), and Stevens does not knowingly collect PII from individuals under 13 years of age.

VI. Third Party Services

This Privacy Policy does not address, and Stevens is not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Stevens website links. The inclusion of a link on the Stevens website does not imply endorsement of the linked site or service by the University or any information contained on such site or service.

In addition, Stevens is not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other application developer, application provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any PII disclosed to other organizations through or in connection with Stevens Services.

VII. Education and Training

All employees must complete periodic privacy training developed and assigned by the Division of Information Technology and the Division of Human Resources. Such training shall address privacy regulations and the applicable policies, standards and procedures related to the security of Stevens information systems.

VIII. Violations and Concerns

All members of the Stevens community are required to comply with this Policy and the Policies referenced herein. Violations of this Policy or the Policies referenced herein may result in suspension or termination of access to Stevens information systems. Students, faculty, staff, visitors and vendors who violate this Policy will be subject to disciplinary action, up to and including termination, expulsion or removal from campus.

Members of the Stevens community are encouraged to report all privacy concerns to privacy@stevens.edu. Members of the University Community may also report such concerns anonymously through the University's EthicsPoint Compliance Hotline at (855) 277-4065 or on the EthicsPoint website.[1]

[1] https://secure.ethicspoint.com/domain/media/en/gui/31028/index.html