



Campus Administrative Policy

Policy Title: Online Privacy Policy

Policy Number: 3008 Functional Area: General Administration

Effective:	April 1, 2019
Date Last Amended/Reviewed:	September 23, 2013
Date Scheduled for Review:	July 1, 2026
Supersedes:	University Notice of Privacy Practices September 23, 2013

Approved by:	Donald M. Elliman, Jr. Chancellor, University of Colorado Anschutz Medical Campus Dorothy A. Horrell Chancellor, University of Colorado Denver
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Prepared by:	Legal
Reviewing Office:	Chancellors
Responsible Officer:	Chancellors

Applies to:	CU Anschutz Medical Campus CU Denver
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Online Privacy Policy

Your privacy is important to us, and we go to great lengths to protect it. Please find the [University Notice of Privacy Practices \(PDF\) here](#).

Effective Date: April 1, 2019

Commitment to Individual Privacy:

The University of Colorado Denver | Anschutz Medical Campus (“CU Denver | Anschutz” or “we” or “University”) supports the protection of individual privacy and is committed to ensuring the confidentiality of personal information provided by its employees, students and other members of the University community. This privacy policy provides a general description of the ways we collect information about individuals, how we may use or disclose this information, and how we safeguard this information. This policy covers the business practices of the CU Denver | Anschutz Campus.

Online Privacy Notice:

CU Denver | Anschutz supports the protection of the privacy of individuals who visit official campus websites (the “Site(s)”). It recognizes the numerous laws that govern the collection, storage, transfer, use and access to personal information. This statement extends to the collection of all personal information, regardless of source or medium; it does not govern or apply to the collection of data collected by a CU Denver | Anschutz covered component, as defined under the Health Insurance Portability and Accountability Act of 1996, as amended.

This statement does not apply to websites that are created and maintained for purposes other than conducting official University business by individual faculty, staff or students using resources made available within a University domain.

Collection of Information:

It is the practice of CU Denver | Anschutz to collect the least amount of personal information required to fulfill its duties and responsibilities, to complete a particular transaction, or as required by law. Personal information includes, but is not limited to, your name, email address, postal address, telephone number, username and password, and other information specific to you.

You may choose whether or not to provide personal information to CU Denver | Anschutz via the Internet. If you choose not to provide personal information, you can still visit most CU Denver | Anschutz Site(s), but you may be unable to access certain options, offers and services.

For website administration purposes, non-personal information is collected for analysis (“Usage Information”). Usage Information includes, but is not limited to, number of visitors, number of page views, IP address, website pages visited prior to visiting the Site(s), browser information, technical information about your device, system, software, and peripherals.

Usage Information is used to help diagnose problems, assess what information is of most interest, determine technical design specifications, and identify system performance and/or problem areas, and other administrative functions. CU Denver | Anschutz may use Usage Information to facilitate the provision of software updates, product support and other services to you (if any).

Sharing and Disclosing Your Information:

CU Denver | Anschutz may, for example, provide your personal information to third parties in the following instances: (i) to the extent necessary to comply with applicable law and our legal obligations, such as to comply with a subpoena or similar legal process; (ii) when CU Denver | Anschutz believes in good faith that disclosure is necessary to protect its rights, your safety or the safety of others; (iii) with third party vendors, consultants and other service providers who work for us and need access to your information to do that work; (iv) to investigate fraud, or respond to a government request; (v) to comply with an appropriate request under the Colorado Open Records Act (C.R.S. § 24-72-201 et. seq.); (vi) if you request that someone from CU Denver | Anschutz share your information; and (vii) in connection with or during negotiation of any merger, financing, acquisition, or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets to another company.

Colorado Open Records Act (CORA): As a public institution of the state of Colorado, the University must comply with CORA. Information we handle, including your personal information, may be available for request under CORA if it is not protected under any other law or specifically exempt from disclosure under CORA. We will not disclose information protected by law in response to a public records request.

Protecting Your Information:

CU Denver | Anschutz has security policies and standards regarding the protection of personal information. These standards include both administrative and technical requirements to appropriately protect personal information. CU Denver | Anschutz has an information security officer and team who assist departments in providing appropriate protection for personal information. This includes active monitoring and assessments to detect potential security issues.

When third party vendors, consultants, and other service providers who work for CU Denver | Anschutz handle your information, CU Denver | Anschutz relies on a combination of contractual requirements, third-party audits, security reviews and assessments and as assurances that personal information is appropriately protected.

Third Party Tracking and Advertising:

CU Denver | Anschutz is not responsible for the content or privacy statements of those links or the content of any third-party websites. If you are asked to supply personal information to those websites, we suggest you read carefully through the privacy statements of those websites or mobile applications.

CU Denver | Anschutz may include information on the Site including social media features. These social media features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the social media feature to function properly. Social media features may be hosted by a third party or hosted directly on the CU Denver | Anschutz Sites. Your interactions with these social media features are governed by the privacy statement of the company providing them.

CU Denver | Anschutz may use your information to re-target or re-market to you via advertisements on the Site. CU Denver | Anschutz may partner with a third party ad network to manage our advertising on other sites. Our ad network partner may use cookies and Web beacons to collect non-personally identifiable information about your activities on the Site and to then provide you with CU Denver | Anschutz advertising on other websites. We may also place a persistent third-party cookie on your hard drive if you sign on to

ucdenver.edu or cuanschultz.edu. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by utilizing the Google opt-out tool or the Network Advertising Initiative website tool. Please note this does not opt you out of being served advertising. You may continue to receive generic non-targeted ads featuring CU Denver | Anschutz.

Cookies, Web Beacons and Trackers:

CU Denver | Anschutz uses certain technologies to help us provide you with personalized service, and to help make our websites, applications and services perform better for you.

Cookies are small text files sent from the Site and stored on your device. Use of cookies are a necessary and widely accepted technology utilized by the Site for functionality, performance, user tracking, and personalization. Our Site cookies may be either session or persistent cookies or a combination or both:

- **Session Cookies** are temporary cookies that identify and track users within our Site, applications or services which are deleted when you close your browser or leave your session in the application or service.
- **Persistent Cookies** are cookies which enable our websites, applications or services to “remember” who you are and to remember your preferences within our Site, applications or services and which will stay on your computer or device after you close your browser or leave your session in the application or service.

CU Denver | Anschutz also uses another similar website technology known as web beacons to count users who have visited our Site after clicking through from one of our advertisements on another website or in emails and to collect details of any website services utilized. These web beacons collect limited information which does not identify particular individuals. While it is not possible for you to restrict the use of web beacons, because they are used in conjunction with cookies, you can effectively disable them by setting your browser to restrict or block cookies.

Children's Privacy:

Any child under the age of 13 should not register to use any portion of the CU Denver | Anschutz website, or provide any personal information. It is not CU Denver | Anschutz's desire or intent through its Site to collect and store any personal information from any person CU Denver | Anschutz actually knows to be under the age of 13.

Family Education Rights and Privacy Act (20 U.S.C. § 1232g):

In general, the Family Education Rights and Privacy Act ("FERPA") prohibits the release of students' educational records. However, the University of Colorado may release student directory information or student educational records if allowed or required by FERPA. For more information about FERPA contact your campus registrar's office.

What You are Consenting to:

By using the Site(s), you are consenting to the use and processing of your information as set forth in this Privacy Notice, almost all of which activities will take place in the United States. If you reside outside the U.S., your information will be transferred to the U.S., and processed and stored there under U.S. privacy standards. By using the Site and providing information to us, you consent to such transfer to, and processing in, the U.S.

If CU Denver | Anschutz collects information based on your consent, CU Denver | Anschutz will conform to the processes outlined in any applicable consent form. If you provide information based on consent, you may generally withdraw your consent at any time. However, withdrawal will not affect the processing based on such consent prior to withdrawal.

My Rights Regarding my Personal Information:

The rights you have regarding the use and disclosure of your personal information depend on the nature of your relationship to CU Denver | Anschutz, applicable law, and the type of the information the University holds about you. Please be aware that personal information rights under international, United States, and Colorado information and privacy laws may differ. Depending on the applicable law(s), you may have the right to request:

- A list of the types of the personal information CU Denver | Anschutz has about you;
- That CU Denver | Anschutz correct inaccurate information about you (For example, updates to your name, contact information, etc.);
- That CU Denver | Anschutz delete information about you. (Depending on your role at CU Denver | Anschutz, the information CU Denver | Anschutz stores about you, applicable law, and the University of Colorado's record retention requirements, CU Denver | Anschutz may not delete your information); and/or
- To have CU Denver | Anschutz stop processing your information.

You should direct all requests to exercise these rights to the contact information provided in the Comments and Feedback section.

Comments and Feedback:

Send comments or questions to Reg.Compliance@ucdenver.edu. If you send comments, please include a mailing address. Do not send attachments with the message. (Due to concern about computer viruses and the damage they cause, email messages containing attachments will be deleted without opening them.)

Disclaimer:

The information provided in this Privacy Notice should not be construed as giving business, legal or other advice, or as guaranteeing the security of information provided through CU Denver | Anschutz's websites.

Updates:

This Privacy Notice may be modified or updated at any time by CU Denver | Anschutz.

Notes

1. Dates of official enactment and amendments:
March 18, 2019: Adopted / Approved by the Chancellors
2. History:
July 1, 2019: This policy has not been reviewed or updated since 2013. The previous online privacy policy did not address collection and use of individual data when using our websites.
3. Initial Policy Effective Date: March 18, 2019. Although this replaced what is now called the University Notice of Privacy Practices September 23, 2019 just on the “Privacy Policy” webpage.
4. Cross References/Appendix:
 - University Notice of Privacy Practices, September 23, 2019