

# Greenfield Community College Website Data Privacy Policy

This policy is applicable only to personal information obtained through the College's website and describes the information we collect from or about you; ways we disclose, make use of and protect that information, and how you can update your information or contact us with any questions or concerns. We hope that in reading this Policy you gain a clearer understanding of how we manage such information.

## **INFORMATION COLLECTED ABOUT YOU**

### **A. Information Collected by Greenfield Community College**

#### **1. In General**

Personal Information is information which can be used to identify you. When you visit our website, Greenfield Community College collects only the Personal Information you provide to us. We collect Personal Information that you provide us in two general and distinct ways:

(1) When you send a Web form or use the telephone to contact Greenfield Community College for the purpose of paying your bill, asking questions, or for any other purpose.

(2) When you choose to send Greenfield Community College an e-mail or participate in surveys.

#### **2. Registration and Personal Information**

You may use our Website without registering or submitting any Personal Information. In that case, the only information we collect will be non-personal information collected through the use of cookies. However, in order to have access to certain services and content (e.g., using the Self Service or Banner System features), you must provide certain Personal Information. We use the Personal Information that you provide to respond to questions from you. We may also use this information to send you emails with special promotions or newsletters with content that we think may be of interest to you. You can always opt-out of receiving such emails or unsubscribe from newsletters at any time.

#### **3. Cookies**

We also collect anonymous, non-personal information about your use of our site or your use of emails, special promotions or newsletters that we send to you. For example, we collect non-personal information about your use of our site and your use of the sites of selected sponsors and advertisers through the use of cookies. Cookies are small computer files that we transfer to your computer's hard drive that allow us to know how often you visit a site and the activities you conduct while on that site (such as which pages you visited and the length of time you spent on each of those pages). Every computer is assigned a different cookie by Greenfield Community College. The information collected by cookies helps us improve the content on web pages or in emails specifically designed for you and also allows us to statistically monitor how many people are using our site, or opening our emails, and for what purposes. We may use cookie information to target certain messages to your browser or to determine the popularity of certain content.

Your browser software can be set to reject all cookies. Most browsers offer instructions on how to reset the browser to reject cookies in the "Help" section of the toolbar. If you reject our cookie, certain of the functions and conveniences of our site may not work properly but you do not have to accept our cookie in order to productively use our site. While it may be possible to link non-personal cookie information to

Personal Information collected in other ways, please be assured that if you accept our cookie we will not, without your consent, link the cookie information we collect to Personal Information you provide to us on our site.

#### **4. E-mails and Newsletters**

As noted in the discussion of cookies (see above), we collect anonymous, non-personal information about your use of e-mails and newsletters that we may send to you. In some cases, when you click on a link in an e-mail or newsletter, your browser may be momentarily directed to the site of a third party which, acting on Greenfield Community College's behalf, notes or counts your response to the e-mail or newsletter before re-directing your browser to its proper destination.

#### **B. The Family Educational Rights and Privacy Act of 1974 (FERPA)**

Students are accorded certain rights under the federal law regarding the confidentiality of their student educational records. For more information on these rights please visit:

<http://www.gcc.mass.edu/registrar/ferpa/>

#### **DISCLOSURE OF YOUR INFORMATION**

Except as set forth in this policy or as specifically agreed to by you, Greenfield Community College will not disclose any Personal Information it gathers from you on our Website. We may release Personal Information to third parties: (1) where permitted or required to by law; (2) to comply with valid legal requirements of a search warrant, subpoena or court order; or (3) in special cases, such as a health or safety emergency. In the event that we are legally compelled to disclose your Personal Information to a third party, we will notify you unless doing so would violate the law or court order.

##### **A. Disclosures to Greenfield Community College's Foundation**

Greenfield Community College may disclose Personally Identifiable Information to its Foundation in accordance with the terms of this Policy and FERPA.

##### **B. Disclosure to Greenfield Community College's Contractors and Consultants**

Greenfield Community College contractors and consultants sometimes have limited access to your Personal Information in the course of providing products or services to Greenfield Community College. These contractors include, but are not limited to, vendors and suppliers that provide the College with technology, services, and/or content related to operation and maintenance of our Website. Unless you have opted out of receiving emails and newsletters from Greenfield Community College, these contractors and/or consultants also may have access to your email address to send newsletters or special promotions to you on our behalf or to send emails to you for purposes such as conducting market research on our behalf. Access to your Personal Information by these parties is limited to the information reasonably necessary in order for them to perform their limited function for Greenfield Community College. We also contractually require that our contractors and consultants: (1) protect the privacy of your Personal Information consistent with this Policy and their own data security policies, (2) notify the College immediately in the event of an unauthorized disclosure of such information; and (3) not use or disclose your Personal Information for any purpose other than providing us with products and services.

##### **C. Disclosure to Advertising Partners**

Greenfield Community College does not sell advertising to or accept advertising from other parties for display on the Website; consequently, Greenfield Community College makes no disclosure of any Personal Information to such entities.

## **HOW GREENFIELD COMMUNITY COLLEGE HANDLES PRIVACY AND SECURITY INTERNALLY**

Greenfield Community College wants your Personal Information to remain as secure as possible. Greenfield Community College uses Secure Socket Layer (SSL) encryption technology in transmitting your Personal Information to systems to help ensure the integrity and privacy of the Personal Information you provide to us via the Internet. Concerning employee information, only a limited number of Greenfield Community College employees are authorized to access your Personal Information and only for College related business purposes. All Greenfield Community College employees must abide by our Privacy Policy and those who violate our Privacy Policy are subject to disciplinary action, up to and including expulsion or termination, and possible legal action. The College will make every reasonable effort to protect your Personal Information from loss, misuse, or alteration by third parties.

## **YOUR PRIVACY CHOICES**

From time to time on the Greenfield Community College Website, you may be given the option of receiving recurring information or newsletters via email from Greenfield Community College and/or directly from third parties.

If you wish to subscribe to such newsletters via email, we ask for contact information, such as name and email address.

This privacy statement applies only to the Greenfield Community College website. The Greenfield Community College website does contain links to other sites. Once you enter another website (whether through an advertisement, service, or content link), be aware that Greenfield Community College is not responsible for the content or privacy practices of such other sites. We encourage you to look for and review the privacy statements of each and every website that you visit through a link or advertisement on Greenfield Community College's site or any site that collects Personal Information from you.

## **UPDATING YOUR PERSONAL INFORMATION AND CONTACTING GREENFIELD COMMUNITY COLLEGE**

You can always contact us in order to (1) request your Personal Information from our systems with appropriate security verification, (2) update the Personal Information that you have provided to us, and (3) change your preferences with respect to marketing contacts or other activities, by contacting [admission@gcc.mass.edu](mailto:admission@gcc.mass.edu) or 413-775-1801. Such changes will not have any effect on other information that Greenfield Community College maintains.

You should be aware that it is not technologically possible to remove each and every record of the information you have provided to Greenfield Community College from our servers. The need to back-up our systems to protect information from inadvertent loss means that a copy of your Personal Information may exist in a non-erasable form.