



# SULC Privacy Policy Related to Capture of Personal Information Via SULC Website

## Policy Number 8-0015

<b>Responsible Unit:</b> Information Technology	<b>Effective Date:</b> 7/31/2021
<b>Responsible Official:</b> Associate Vice Chancellor, Information Technology	<b>Last Reviewed Date:</b> 7/19/2021
<b>Policy Classification:</b> Governance	<b>Last Revised Date:</b> N/A
	<b>Origination Date:</b> 7/19/2021

### 1.0 Rationale:

To outline privacy standards related to the collection, use, and dissemination of personal information by SULC captured via the Law Center's website.

### 2.0 Policy Scope:

The policy applies to all internal and external users accessing and utilizing the SULC website resources. Furthermore, the policy applies to all information digitally collected by or submitted to SULC via its web site; that is, information collected automatically via websites; and, information voluntarily provided by the user in order to receive information and/or services (via web forms).

### 3.0 Definitions:

User – SULC employees and students, contractors, vendors, and agents working under the auspices of the Law Center, and the general public.

### 4.0 Policy Compliance:

Failure to with the policy will result in progressive disciplinary action up to and including termination.

### 5.0 Procedure:

#### 5.1 Information Collection

##### 5.1.1 Automatic Collection

If a user has not taken specific steps to anonymize their personal internet traffic, official SULC websites may collect certain information automatically. This information includes, but is not limited to:

- User's Internet protocol (IP) address
- Internet service provider
- Operating system
- The time and date of the visit
- Browser
- The site from which the user visited.

- Cookie information (if applicable)

Any information collected automatically is not associated with any other information held by SULC (i.e., not linked with information voluntarily provided to SULC) unless SULC is required to do so by law.

### **5.1.2 Voluntary Submission**

In order to provide information and/or services, SULC may request users to provide personal data, some of which may be personally identifiable information. Information such as name, date of birth, email address, etc. can be collected via voluntary submission of an email or web form to SULC.

## **5.2 Information Use**

Website information that is gathered automatically is utilized to improve the understanding of how SULC-provided websites or associated web services are being leveraged by the user community. For example, some SULC web services may utilize analytic packages to determine how users navigate SULC web services or sites. Such data may be used for various purposes, including the evaluation of website use, reports on website activity, and other services.

Any information submitted to SULC voluntarily in order to receive services and/or information will only be utilized to conduct official law center business. SULC may disseminate voluntarily submitted information to third parties and offices/departments within SULC to the extent necessary in order to provide the requested services and/or information. SULC may also disseminate such information if required by applicable law-enforcement agencies.

SULC will not disclose any information submitted voluntarily for reasons other than mentioned above, without clear notice and the opportunity to opt-out or otherwise prohibit such uses. SULC will never sell or trade voluntarily submitted information to other entities unless a prior consent has been obtained and/or such information is being shared in response to a subpoena, court order, or legal process.

There is no legal requirement for a user to provide any information to SULC. However, without certain information, SULC websites or services may not function as intended and features may be inaccessible.

## **5.3 Use of Cookies**

Some SULC websites or services may use cookies which enable SULC to further tailor its web services to the needs of the user community. Cookie data assists the law center in improving both web content and distribution. Users have the right to refuse the use of cookies by implementing technical configurations in their web browsers; however, functionalities of certain sites may be impacted if such configurations are implemented.

#### **5.4 External Links**

Some SULC websites or services may contain links to external websites not owned by, or officially affiliated with, SULC in any way. If a user decides to navigate to external links, he/she will leave the SULC website and thus, the law center is not responsible for privacy practices or the content of such websites. Navigating to external links is done at the user's own risk and users should be aware that SULC's policies no longer apply. SULC recommends that users review the privacy policy and applicable terms of all sites they visit.

#### **5.5 Data Security**

SULC implements stringent security measures wherever possible to promote confidentiality, integrity, and availability of any information in the possession of the law center. SULC websites or services that allow users to submit information voluntarily utilize encryption to prevent third parties from viewing the submitted data. Personal information voluntarily submitted via email cannot leverage encryption in most cases, and thus email is not a mechanism that SULC will recommend for submitting confidential and/or personal data. Users that submit unsolicited confidential and/or personal information via email must do so at their own risk.

While the security of user data is of the utmost importance to SULC, due to the nature of Internet communications, no data transmission over the Internet can be guaranteed to be completely secure. Any information transmitted to SULC by the user is done so at the user's own risk. Once the information is received by SULC, the law center will make every effort to ensure the security of data on SULC's systems.

#### **6. Policy History and Review**

New policy was created 7/19/2021. The policy is subject to a five-year policy review cycle and shall be reviewed by the Associate Vice Chancellor for Information Technology and any changes will be submitted to the Chancellor for approval.

#### **7. Publication of Policy**

This policy is published on the Southern University Law Center website at [www.sulc.edu](http://www.sulc.edu).

#### **8. Policy Approval**

This policy was approved by the Chancellor on 5/19/2021.



John K. Pierre  
Chancellor, Southern University Law Center



Date