

Cleveland University-Kansas City Website Privacy Policy

Last Modified: August 23, 2021

Applicability

This Privacy Policy applies to Services provided through websites that are owned and operated by Cleveland University – Kansas City (referred to as “**Cleveland**,” “**we**,” “**us**,” or “**our**” as the context may require), including but not limited to www.cleveland.edu, shop.cleveland.edu, and www.chirohealthkc.com (collectively, the “**Sites**”). The Sites provide information related to the educational and healthcare services provided by Cleveland, its academic programs, financial aid, alumni directories and events, campus life, Cleveland’s health clinic, and other related information; and the Sites accept requests for information and online applications for admission (the “**Services**”).

This Privacy Policy applies to information we collect through the Sites and through other online or electronic means other than those records, portals or methods that are specifically excluded herein. This Privacy Policy covers our treatment of non-personally identifiable and Personal Data that we collect when you are on the Sites and when you use Services provided on the Sites.

Foundationally, this Privacy Policy does not apply with respect to information that constitutes either Protected Health Information protected by Health Insurance Portability and Accountability Act (“**PHI**”, see Cleveland’s Notice of Privacy Practices) or any information that constitutes educational records protected by the Federal Educational Rights and Privacy Act (“**Educational Records**”, see Student Rights under the Family Educational Rights and Privacy Act). The Sites may provide you links to other student and/or faculty portals which provide you access to one or more of: personal academic information, course schedules, course registration, communication functionality between students and faculty, financial aid information, payment information, account status, and other more secure information. These portals require unique user credentials which you have been separately provided. The information stored and accessed through these portals is not governed by this Privacy Policy and is governed by the privacy policies specifically applicable to these portals, which you should have been separately provided. For more information regarding the privacy policies which apply to these user portals, please review the information available at <https://www.cleveland.edu/about-us/consumer-information/>.

This Privacy Policy is part of the Terms of Use which constitutes a binding agreement between you and Cleveland. Please read carefully through all sections of this Privacy Policy. Your access to and use of the Sites is subject to this Privacy Policy and all applicable laws. By accessing and/or otherwise using the Sites, or otherwise submitting your contact information to receive more information from us or make a financial contribution through the Sites, you agree to Cleveland’s use of the non-personal and personal data we collect through your use of the Sites as set forth below in this Privacy Policy. If you do not agree to this Privacy Policy, then you may not use the Sites and you should not submit your personal data to the Sites. In addition, if you complete a purchase or other transaction with us than such transaction will be subject to

additional terms and conditions which you will agree to when you complete such transaction (“**Terms of Sale**”).

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Sites, including information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, social security number or any other identifier by which you may be contacted online or offline (“**Identifiers**”);
- Information about that is associated with Personal Data and is therefore identifiable information, including any interests, work experience, criminal history, citizenship, previous education history with a Cleveland school or other schools, and any other information that you provide to us that is associated with an Identifier (collectively with the Identifiers, “**Personal Data**”)
- That is about you but individually does not identify you, such as demographic or interest information that is not identifiable; and/or
- About your internet connection, the equipment you use to access our Sites, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- In certain cases, from third parties, for example, our business partners.

Information You Provide to Us

The information we collect on or through our Sites may include:

- Information that you provide by filling in forms on our Sites. This includes information provided at the time of registering to use our Sites, applying for admission (to the extent not an Educational Record), purchasing products or conducting other transactions, posting material, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Sites.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Sites and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Sites.
- Your search queries on the Sites.

You also may provide information to be published or displayed (hereinafter, “posted”) on public areas of the Sites, or transmitted to other users of the Sites or third parties (collectively, “**User Contributions**”). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are

perfect or impenetrable. Additionally, we cannot control the actions of other users of the Sites with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Sites, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Sites, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Sites.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include Personal Data or we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties. It helps us to improve our Sites and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Sites according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Sites.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Sites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Sites.
- Flash Cookies. Certain features of our Sites may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Sites. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- Web Beacons. Pages of our Sites and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Cleveland, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Some content or applications, including advertisements, on the Sites may be served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Sites. The information

they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see Choices About Your Information.

How We Use Your Information.

We use information that we collect about you or that you provide to us, including Personal Data:

- To present our Sites and their contents to you.
- To provide you with information, products, or services that you request, order, or purchase from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account(s) with us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Sites or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Sites.
- To contact you about our own and third-parties' goods and services that may be of interest to you.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Information Sharing and Disclosure

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Data that we collect or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our operations (including cloud service providers, analytics providers, payment processors, and other parties that support our operations both online and offline).
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Cleveland's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Cleveland about our Sites' users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your Personal Data:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use and Terms of Sale and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Cleveland, our customers, or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

In the event you voluntarily share personal or sensitive information on a message board, comments section, or in a chat room offered by the Sites, please be advised that such information may be collected and used by the other users of the Sites who have access to such message boards, comment sections and chat rooms. Cleveland shall have no liability resulting from the misuse of information you voluntarily share during your use of the Sites. Cleveland shall have no obligation to police the message boards, comment sections and chat rooms, but has the ability to remove such information at any time in its sole discretion.

Choices about Your Information

Changes: Upon your written request, we will remove that information from our database or change or correct personal data that you state is erroneous in accordance with applicable regulatory or other legal requirements. You should understand, however, that information about you in our database might come from a number of sources.

Tracking Technologies: You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

Promotional Offers from Cleveland. If you do not wish to have your contact information used by Cleveland to promote our own or third parties' products or services, you can opt-out by contacting us at the address below and request to be removed from our mailing list.. If we have sent you a promotional email, you may unsubscribe from future promotional email distributions by following the unsubscribe instructions in such emails. This opt out does not apply to information provided to Cleveland as a result of a product purchase, product service experience, any Educational Records or other transactions.

Third Parties: We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of certain targeted ads by visiting the Network Advertising Initiative at <https://optout.networkadvertising.org/> and the Digital Advertising Alliance at <https://optout.aboutads.info/>.

Commitment to Children's Privacy

Our Sites are not directed to children under 13 years of age and we prohibit such children from becoming users, and we do not knowingly collect information from children. By using our Sites, you represent that you are 13 years of age or older.

Security Disclaimer

You acknowledge that no electronic storage method or data transmission over the Internet can be guaranteed to be 100% secure.

Changes to this Privacy Policy

We reserve the right to change, modify or otherwise update this policy at any time. These changes or updates will be effective immediately. We may provide you notice of such changes when they are material, such notice may be given by posting on this Sites, by electronic or conventional mail or by any other means by which you obtain notice of the changes or updates.

Questions

If you have any questions about Cleveland, the Sites, the Services, the Terms of Use, the Terms of Sale, or the Privacy Policy, you may contact us at:

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Overland Park, Kansas 66210
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