

The Albion Center Privacy Statement

The Albion Center for Professional Development at Idaho State University (“The Albion Center”) is committed to protecting and respecting the privacy rights of all individuals who use its website, products, and services, including but not limited to professional development and other educational programs, academic advising, and other services provided by The Albion Center (the “**Services**”). The Albion Center Privacy Statement (“**Statement**”) provides a general description of the personal information that The Albion Center collects and explains how The Albion Center uses the information. This Statement also contains links to relevant policies in specific areas.

1. Scope of this Privacy Statement

This Statement covers all individuals who are natural persons (not a corporation, partnership, or other legal entity) whose Personal Information is handled by The Albion Center. This Statement applies to all members of the The Albion Center community including all faculty, staff, students, third-party contractors, vendors, volunteers, agents, and members of the public who are engaged in The Albion Center Services and/or have access to Personal Information obtained as part of The Albion Center Services.

The Albion Center’s website may contain links to and from various third-party websites. When following a link to any of these websites, please note that these websites may have their own privacy statements. The Albion Center does not accept any responsibility or liability for policies of third-party websites; please check these policies before submitting any Personal Information to third-party websites.

2. Personal Information We Collect and Handle

The Albion Center may collect Personal Information from various sources as described below. The Albion Center will take all reasonable and practical measures to ensure that unnecessary Personal Information is not collected.

Definition

Generally, Personal Information is any information that relates to an identifiable person and may be defined more specifically by applicable laws and regulations. For example, if you are located in the European Economic Area (EEA), United Kingdom, or China, “Personal Information” includes all personal data as defined in the European Union General Data Protection Regulation, UK General Data Protection Regulation, or People’s Republic of China Personal Information Protection Law, respectively. Personal Information does not include information that has been fully anonymized to make it impossible to identify specific natural persons and impossible to restore.

Information Provided by You

The Albion Center may collect Personal Information from you directly, for example, when you fill out an online form requesting information, create an account, register for professional development courses, communicate with us, respond to a survey, partner with us to develop courses, apply to work for the The Albion Center, or work for The Albion Center. The Albion Center may collect information from prospective students and employees, students, faculty and staff, alumni, and others who use The Albion Center’s Services.

Personal Information collected directly may include, but is not limited to, your name, email address, mailing address, telephone numbers, education history, work experience, and payment information. If you

apply to work for The Albion Center, Personal Information collected directly may also include any information you provide on your application and supporting documents, as well as information needed to administer payroll, benefits, performance management, and other common human resources functions.

Information Collected from Other Sources

The Albion Center may obtain Personal Information about you from third parties including public and private databases, direct mailing service providers, or companies or institutions that may sponsor or facilitate your participation in our Services. This information may include your name, email address, mailing address, telephone numbers, education history, work experience, and other similar information.

If you apply to work for The Albion Center, The Albion Center may also obtain Personal Information about you from individuals who serve as a personal reference and from third parties that provide background screening information or the results of employment tests or assessments.

Information We Collect by Automated Means

Like most other website operators, Idaho State University (“ISU”) also collects Personal Information through automated processes (e.g., cookies) that provide information about how users interact with its websites, including but not limited to its The Albion Center websites. Cookies are small amounts of data collected and stored on the individual’s device when an individual accesses a website. The data collected may include the account name, user ID, Internet Protocol (“IP”) address, the type of browser and operating system used to access the website, the date and time of website visit, the amount of time spent on the website, the pages visited, and the e-mail or webpage that referred the visitor to the site.

ISU uses “first-party cookies” that are set through ISU websites, including Google Analytics and Google Analytics Demographics and Interest Reporting cookies. Google Analytics uses cookies to help websites analyze how users use the website. The information gathered about your use of the websites (and possibly your IP address) is transmitted to and stored by Google. There are also “third-party cookies” set by third parties through ISU websites.

ISU and third-party vendors, including Google, use first-party cookies and third-party cookies together to inform, optimize ads, and serve ads based on a person’s past visits to ISU websites, and to display content-specific advertisements to visitors that have previously visited ISU websites when they go to other websites. They are also used to report visitor ad impressions other uses of the ad services, and how interactions with those ad impressions and ad services are related to visits to ISU websites. ISU uses data from Google’s interest-based advertising or third-party audience data such as age, gender, and interests, with Google Analytics to report, optimize, and deliver interest-based advertisements. To learn more about how Google handles data collected from Google Analytics, please see [Google’s Privacy Policy](#).

You can opt out of Google Analytics for Display Advertising and customize Google Display network ads by using [Google Ad Settings](#), and you can control the use of most other cookies found on websites by using the settings provided by your specific web browser. Using the controls provided by most web browsers, you can choose to accept cookies, disable cookies, and/or remove cookies from your device. Consult your web browser’s guidance documentation for more information on managing cookie settings for your browser. Please note that disabling cookies may cause some websites or web pages to malfunction, and/or you may have to provide the same information each time you visit those websites or web pages.

Follow the links below for instructions on how to delete or disable cookies in some of the most widely

used web browsers. These links will direct you to third-party websites; ISU and The Albion Center are not responsible for the privacy policies or practices of such third-party websites. • [Chrome](#)

- [Firefox](#)
- [Internet Explorer](#)
- [Safari](#)

3. How We Use Personal Information

The Albion Center will only collect, store, access, use or otherwise handle your Personal Information when permitted or required by applicable law and there is a legitimate reason and legal basis for doing so. In most cases, The Albion Center uses your Personal Information when necessary to fulfill a legitimate interest of The Albion Center in furtherance of its mission or to fulfill statutory duties or responsibilities, for example to comply with state and federal obligations. Other bases for the lawful processing of Personal Information may include the existence of a contractual relationship between the user and The Albion Center and where the user has given their consent. Where the legal basis is individual consent, collection and use will be consistent with the consent that was provided. All Personal Information collection and handling will comply with all applicable law and ISU policies.

Students and Prospective Students

If you are an Albion Center prospective student or current student, The Albion Center may use your Personal Information to communicate with you in relation to The Albion Center's Services that you are receiving or may be interested in receiving; maintain records of your academic activities in relation to The Albion Center's Services; deliver information technology services to protect your Personal Information, and facilitate your participation in The Albion Center's Services; and conduct surveys, research, and analysis to enhance The Albion Center's Services.

Course Developers

If you are a course developer, The Albion Center may use your Personal Information to communicate with you in relation to your work with The Albion Center, deliver information technology services to protect your Personal Information, and enter into and perform a contract with you.

Employees and Applicants

If you apply to work at the The Albion Center or if you are employed by the The Albion Center, The Albion Center may use your Personal Information to communicate with you in relation to your application; deliver information technology services to protect your Personal Information; assess your suitability for a particular role or task; support you in implementing work accommodations; administer payroll, benefits, and performance management; conduct surveys, research, and analysis for internal use; support your professional development; and perform other common human resources functions.

4. How We Disclose and Share Personal Information

When Personal Information is required or permitted to be disclosed, The Albion Center will disclose the least amount of Personal Information reasonably necessary to fulfill the relevant obligations or to achieve the relevant goals. The Albion Center may disclose Personal Information about you in the following circumstances:

Internal and Related Organization Use

The Albion Center shares Personal Information with employees, including faculty, accounting staff, human resources staff, and others associated with The Albion Center in order to carry out activities in furtherance of its Services and mission.

Sharing with Your Consent

The Albion Center will share your Personal Information when we have your consent to do so.

Third Parties

The Albion Center does not rent, sell, or trade Personal Information to third parties. The Albion Center may share Personal Information with third parties that provide services or products, support operations, or otherwise help The Albion Center carry out activities in furtherance of its Services and mission. Examples include partner institutions, learning platform providers, payment processors, email marketing service providers, and other service providers (e.g., web hosting, web analytics, marketing, etc.). The Albion Center shares only the Personal Information necessary to enable such third parties to provide their products and services in furtherance of The Albion Center's Services and mission. These third parties are prohibited from using your Personal Information for their own purposes. To the extent applicable law requires The Albion Center to obtain individual consent and/or provide notice to Personal Information Subjects prior to sharing Personal Information, The Albion Center will obtain the necessary individual consent and/or provide the necessary notice in accordance with applicable law and prior to sharing. Any sharing of Personal Information will be consistent with this consent and notice.

Law Enforcement and Government Agencies

The Albion Center may share Personal Information with law enforcement agencies when required to do so by law, court order, or other legal process, or when required to exercise The Albion Center's legal rights or establish or defend legal claims. The Albion Center may also share Personal Information with government agencies in order to comply with regulations, and in certain instances, The Albion Center may be required to disclose Personal Information to comply with Idaho open records laws.

Anonymized Information

The Albion Center may provide anonymized Information developed from Personal Information to third parties. Such anonymized Information, which cannot identify specific natural persons and is impossible to restore, is outside the scope of this Statement.

Public Disclosure

The Albion Center will only publicly disclose Personal Information after The Albion Center obtains explicit consent, or when applicable laws or regulations require or allow The Albion Center to publicly disclose Personal Information.

Cross-Border Transfer

The Albion Center may conduct cross-border transfers of Personal Information to and from the United States of America, where data protection laws may differ from those of an individual's home country. In the event of a cross-border transfer, The Albion Center will comply with applicable data protection laws regarding the protection of Personal Information and will notify individuals about applicable safeguards and the means by which to obtain a copy of them.

5. Rights and Choices

As provided under applicable law and subject to any limitations in such law, you may have certain rights and choices with respect to your Personal Information. Your rights and choices will vary depending on the laws and regulations that apply in relation to the Services The Albion Center provides to you.

6. Data Protection and Retention

The Albion Center takes appropriate security measures according to industry standards including physical, managerial, organizational, and technical safeguards designed to protect your Personal Information and prevent unauthorized access to, disclosure, use, modification, damage or loss of information. However, no method of transmission over the Internet or method of electronic storage is 100% secure. While The Albion Center strives to use commercially reasonable means to protect Personal Information, The Albion Center cannot guarantee its absolute security. Please see [ISU's Information Technology Services policies and procedures](#) for additional information.

The Albion Center deletes or anonymizes Personal Information when it is no longer needed for the purposes for which it was collected, unless required or allowed by policy or law to keep it for a longer period. The Albion Center retains and disposes of Personal Information in accordance with the [Idaho State Board of Education Higher Education Records Retention Schedule](#). More information regarding data retention and disposal of Personal Information is provided in [ISU's University Records, Archives, and Publications Policy](#).

7. FERPA

The Albion Center protects the privacy of student education records consistent with the Family Educational Rights and Privacy Act (FERPA). For more details, please see ISU's webpage providing [General FERPA Information](#).

8. Information for Individuals Under Age 13

Consistent with the Children's Online Privacy Protection Act (COPPA), The Albion Center does not knowingly collect Personal Information from children under 13 years of age on its general website.

9. Contact Information

For further information about our collection or use of Personal Information, please contact the center at albion@isu.edu

10. Changes and Updates to this Privacy Statement

The Albion Center may update this Statement periodically to reflect changes in our privacy practices. Any changes become effective upon publication, and we will follow all applicable laws and regulations regarding notifications of such changes. Your continued use of the Services constitutes agreement with this policy and any updates.

Last updated: 10/16/2023