Governing Body:	Finance and Administration	Policy Number:	FAD.039
Policy Contact:	Chief Information Officer	Date Revised:	6/16/2016
Custodial Office:	Information Technology	Date Approved:	
Approved By:	President/Cabinet	Next Review:	
Related Policy:	SOU Information Security Policy FAD.040 http://sou.edu/assets/policies/docs/Information-Security.pdf SOU Computing Resources Acceptable Use Policy FAD.038 http://sou.edu/policies/Computing-Resources-Acceptable-Use.pdf State of Oregon Privacy and Terms and Conditions http://www.oregon.gov/DAS/ETS/EGOV/pages/termsconditions.aspx		

Revision History

Revision Number:	Change:	Date:
1.1	Update to template format, significant changes	11/06/2014
1.2	Template update and removal of OUS references	6/16/2016

A. Purpose

In order to operate sou.edu and to reduce the risk of fraud, Southern Oregon University (SOU) may ask visitors to its website to provide us certain types of personal information. This policy describes the information we collect and how we use that information. SOU respects the privacy of personally identifiable information.

B. Terms and Conditions

By accessing sou.edu (the Site), users accept these terms and conditions without limitation:

1. Without limiting any of the foregoing, the content of the Site is provided "AS IS" AND WITHOUT WARRANTIES OF ANY KIND, EXPRESS OR IMPLIED, INCLUDING THE IMPLIED WARRANTIES OF MERCHANTABILITY and FITNESS FOR A PARTICULAR PURPOSE OR NON-INFRINGEMENT.

2. Users agree that they will hold harmless and indemnify the State of Oregon and its agencies and officers from and against any damages based on their use of content of this Site.

C. Privacy Statements

Sou.edu is owned and operated by Southern Oregon University (SOU). The privacy of our students, faculty, staff, and visitors on the Internet is of the utmost importance to us. Southern Oregon University does not sell or otherwise provide any information collected on the SOU web site to any external entity except as expressly stated on this site, or as otherwise required by law. SOU does not knowingly collect personal information from children under age 13. This policy is subject to compliance with the Federal Family Educational Rights and Privacy Act of 1974 (FERPA), revised Oregon statutes, and Oregon Administrative Rules. This privacy policy applies to the overall SOU web site and any information provided by users on this site. If any web sites within SOU differ from this policy, they will have their own privacy policy. Users should be sure to check other sites for their privacy policies.

D. Links to Other Sites - A Disclaimer

This site has links to other web sites as a convenience to our customers. These include links to websites operated by other government agencies, nonprofit organizations and private businesses. When a user follows one of these links, they are no longer on this site and this Privacy Notice will not apply. When a user links to another web site, the user is subject to the privacy policy of that new site.

When a user follows a link to one of these sites neither the State of Oregon, nor any agency, officer, or employee of the State of Oregon warrants the accuracy, reliability or timeliness of any information published by these external sites, nor endorses any content, viewpoints, products, or services linked from these systems, and cannot be held liable for any losses caused by reliance on the accuracy, reliability or timeliness of their information. Portions of such information may be incorrect or not current. Any person or entity that relies on any information obtained from these systems does so at his or her own risk.

E. Policy Statement

I. Information Collected

Web Browser Information

If a user browses or downloads information during a visit to this web site, we collect and store only the standard data collected by all web server software. That information is:

1. The Internet Protocol (IP) address used for the user's connection (but not their e-mail address). The IP address is a numerical identifier assigned either to a user's Internet service provider or directly to a user's computer. We use the Internet IP to respond to user browser requests. Example: 122.125.36.42;
2. The domain name assigned to a user's IP Address (if there is one). Example: somename.com;
3. The type of browser and operating system of the user. Example: Mozilla/4.0 (compatible; MSIE 4.01; Windows NT; IE4WDUS-1998101501);
4. The date and time the user visited this site;
5. The web pages or services the user accessed at this site; and
6. The web site the user visited prior to coming to this web site. (Note: this is included so that summary analysis can be done on how visitors get to our site, i.e., from a search engine, from a link on another site, etc.)

For site security purposes and to ensure that this service remains available to all users, this site may monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. If security monitoring reveals evidence of possible abuse or criminal activity, system personnel may provide the results of such monitoring to appropriate officials. Except for authorized law enforcement investigations, no attempts are made to identify individual users or their usage habits. Unauthorized attempts to upload information or change information on this service are strictly prohibited and may be punishable under the state law and federal statutes including the Computer Fraud and Abuse Act of 1986 and the National Information Infrastructure Protection Act of 1996.

Web Browser Cookies

A cookie is a small text file created by a web server and stored on a user's computer hard drive. Cookies save unique information that the web server can access while a user is browsing our web site. Typically, cookies save information such as site preferences, the date a user last looked at a specific page, or a random number used to identify a particular web session. Cookies help us measure how many visitors come to our Web site and how many of these visitors are new or returning.

Cookies placed on a user's computer by our web management tools are written so they can only be used by our web tools, and they only retrieve specific information. We do not gather information from the user, from other cookie files, or access any other information on a user's computer.

Most Web browsers allow a user to deny or accept the cookie feature (refer to a browser's help documentation for details). Users can control the use of cookies on their computer, and even eliminate them. However, eliminating cookie use may interfere with the function of some site services.

Email Information

If a user sends us an electronic mail message with a question or comment that contains personally identifying information, we will only use the personally identifiable information to respond to the request and analyze trends. We may redirect a user's message to another government agency or person who is in a better position to answer their question. If a user provides us with their email address when they register as a customer or make a purchase from us, we may send the user notices of new events, products, and services. Users will be given the option to unsubscribe from any mailing lists to which they have been added.

Required Personal Information

For some services available from our site, a login id and password is required (e.g., SISWeb - users must provide their Student ID number and Personal Identification Number). In order to make payments to SOU, a user must also provide credit card or bank account information. This required information is necessary for us to process transactions, issue a new PIN/password, protect users against credit card fraud, and to contact users should the need arise in administering their account.

Transactional Information

When someone use our site for transactions such as making a donation, registering and paying for classes, purchasing tickets, or applying for admission to SOU, we ask for information related to each transaction such as the amount of the payment or donation, which events a user would like tickets to, the courses a user wishes to register for, or information needed for determining admission status. Information required from the user is the minimum data needed to successfully complete a web transaction. We retain this information for each transaction through the site.

II.   Our Use and Disclosure of Information

Internal Use

We use the information we collect about users in order to provide our services, process their transactions, and to provide customer service.

We give access to personally identifiable information about our web site users only to those SOU employees who need to know that information in order to provide products or services to our users.

Disclosure to Third Parties

SOU will not sell, rent, or lease personally identifiable information to others. SOU will not share any personally identifiable information with third parties except in the limited circumstances described below, or with express permission (and to employees as described above), or to comply with applicable law. These third parties are limited by law or by contract from using the information for secondary purposes beyond the purposes for which the information is shared.

- We share information with organizations that help us process the transactions requested by users and to protect our customers' transactions from fraud.
- We disclose the information we collect to organizations that perform services on our behalf or to other financial institutions with whom we have joint service agreements (e.g., we disclose information to Rogue Community College so that Financial Aid eligibility can be determined when students attend both institutions). These organizations are subject to confidentiality agreements with us and other legal restrictions that prohibit using the information except to provide the specified related services, unless a user has affirmatively agreed or given prior permission for other uses.
- We disclose to cooperate in investigations of fraud or other illegal activity, or to conduct investigations of violations of our Acceptable Use Policy.
- We disclose information in response to a subpoena, warrant, court order, levy, attachment, order of a court-appointed receiver or other comparable legal process, including subpoenas from private parties in a civil action.
- We disclose information to a user's agent or legal representative (such as the holder of a power of attorney or a guardian).
- We share aggregated statistical data with our business partners or for public relations. For example, we may disclose that a specific percentage of our students are Oregon residents. However, this aggregated information is not tied to personally identifiable information.
- We share information with third parties, in compliance with the Federal Family Educational Rights and Privacy Act of 1974 (FERPA), when required by the Oregon Public Records Act.

Internet Address Information

We use IP addresses, browser types, and access times to analyze trends, administer the site, improve site performance, gather broad demographic information for aggregate use, and to conduct investigations on fraud, illegal activity, and other violations of our Acceptable Use Policy.

We do not track individual user navigation choices. We do, however, summarize the information listed above to determine:

- What organizations are our most frequent users to better target our content for the audience
- What browsers are being used on our site to determine what techniques we should use to develop pages that will work with different browser
- How often our pages are being visited

- The traffic from organization names such as search engines that direct people to the site

III.   Information Security

Secure Transmission

This site uses the industry standard Secure Socket Layer (SSL) encryption to enable secure transmission of data. The URL in a browser will change to "HTTPS" instead of "HTTP" when this security feature is invoked. Most browsers will also display a lock or key symbol on its task bar to indicate invoked secure transmission. If these indicators are not present, information may be susceptible to interception by other parties. Most Internet email communication is not considered secure. If a user is communicating sensitive information, they should consider sending it in by postal mail or contacting the university by phone.

Credit or Debit Card Transactions

The secure web pages used for enter credit or debit card information do not save that data in a browser's cache memory. This prevents anyone else from being able to find a user's credit or debit card information by searching that file.

Credit card data is forwarded to our Credit Card Authorization Service provider as an encrypted file. The authorization service verifies that the credit or debit card is both valid and that the transaction does not exceed a credit limit. If the charge is approved, they send an encrypted authorization number back to us and we notify the user that their transaction has successfully been completed. We do not save credit or debit card numbers nor do we print them on any reports.

This policy may be revised at any time without notice. All revisions supersede prior policy and are effective immediately upon approval.

D. Policy Consultation

Business Affairs Council, Tech Council, Provost's Advisory Council

E. Other Information

The Policy Contact, defined above, will write and maintain the procedures related to this policy and these procedures will be made available within the Custodial Office.