

GDPR Privacy Notice

Policy Information

ISSUING OFFICE

Information Services

LIBERTY UNIVERSITY PRIVACY NOTICE FOR INDIVIDUALS LOCATED IN THE EUROPEAN ECONOMIC AREA?

This privacy notice applies only to the collection and processing (including storage) of personal data by Liberty University of 1971 University Blvd., Lynchburg, VA 24515 (also referred to herein as "Liberty," "we," "our," or "us") related to individuals located in the European Economic Area ("EEA") through any Liberty program, offering, or online service that links to or provides this privacy notice to the extent that such collection and processing of personal data is subject to the European Union's General Data Protection Regulation ("GDPR"). As such, this privacy notice applies to EEA-based prospective Liberty students, EEA-based student and employee applicants to Liberty, EEA-based users of Liberty University Online, and EEA-based alumni and donors of Liberty, as well as students and employees of Liberty who are participating in programs or other offerings based in the EEA.

This privacy notice describes how Liberty collects and processes such personal data; how we use and protect this information; and the rights you may have in relation to this information.

This privacy notice will inform you of:

- Personal data we collect and use
- How we use your personal data and the basis on which we use it
- How and when we share your personal data
- Automated decisions about you
- How we use cookies
- How to exercise your rights
- How your personal data is protected and stored
- International transfer of your personal data
- How to contact us?
- Changes to our privacy notice

1. PERSONAL DATA WE COLLECT AND USE

Personal data is information that, alone or in combination with other information, could reasonably be used to identify you. For the purposes of this privacy notice, as well as disclosures and forms that link to this privacy notice, the terms "data" and "information" are used interchangeably, and "processing" and "using" data includes "collecting" and "storing" data (and all tenses in which those terms may be used). We collect personal data directly from you, either through personal communications, whether online or offline, or through your use of websites or mobile applications operated by us or on our behalf, and from third-parties.

Note that we may be required by law to collect certain personal data about you, and we may need to collect and process personal data to fulfill a contract with you (e.g., your name, payment information, contact information, and login credentials). Failure to provide this personal data may prevent or delay fulfillment of these obligations.

Personal data we collect directly from you

The categories of personal data that we collect directly from you may include the following:

1. personal details (e.g., name, date of birth, place of birth);?
2. contact details (e.g., phone number, email address, postal address);
3. demographic details (e.g., age, gender, marital status, languages spoken, current nationality, citizenship status, military or veteran status);
4. identification numbers (e.g., Social Security number, passport or visa number);
5. authenticating information (e.g., user names, passwords, security questions and answers);
6. application information (e.g., personal essay, writing sample, academic transcripts, test scores, letters of recommendation, evaluations, status of interest (e.g., online or on-campus/residential); prior education history; number and nature of previous credits earned or attempted; certificate, licensure, or other professional information; learning, skill, or career assessment and diagnostic data; lead source);?
7. academic information (e.g., transcripts, student status, test scores, grades, disciplinary records and similar behavioral data; current degree program of interest; credits earned or attempted; academic pursuits);
8. employment information (e.g., work history, job titles);
9. financial information (e.g., financial aid or scholarship application and eligibility information, information relating to your family's financial situation, payment information used for tuition or donations);
10. insurance information (e.g., information necessary to secure and facilitate the provision of insurance);
11. preferences and recreational affiliations (e.g., housing and roommate preferences; extracurricular interests; membership with Liberty-sponsored clubs, athletics teams, or affinity groups);
12. professional information (e.g., credentials, certifications, non-Liberty sponsored memberships or affiliations);
13. family information (e.g., marital status, names of relatives who attended Liberty or who are otherwise affiliated with Liberty, emergency contacts);?
14. photographs (e.g., for use in identification or marketing purposes, uploaded during application process, or during enrollment or participation in a Liberty-sponsored activity); and
15. digital source information (e.g., Google analytics and AdWords client ID; keyword ID; publisher code; lead source; webpage viewed; email clicks or other actions taken; browser data, cookies, web beacons, or other device-identifying technology; mobile application downloads and interactions; IP address; geolocation).

When Liberty partners with a foreign institution or other entity to offer a particular program, offering, or service, this personal data may also be collected by the institution or entity where it is located.

Personal data we generate about you?

We generate the following personal data about you:

1. student identification number (e.g., applicant number, myLU ID);
2. academic and financial aid-related information (e.g., transcripts, student status, test scores, credential services, grades, registration status, academic standing, financial aid status, financial aid standing, behavioral data, recommendations or feedback from teachers or advisors, disciplinary records);
3. records of our interactions with you and internal notes (e.g., communications, interview or meeting notes, history of donations, information about your involvement with Liberty, and other interests such as your attendance at events (including ticket purchases), philanthropic interests, volunteer efforts);
4. employment details if you are employed by Liberty as a student, staff, or faculty (e.g., work-study, online adjunct faculty), including salary or pay information;
5. student-athlete eligibility status and related information;
6. on-campus housing assignments and eligibility, and roommate matches;
7. travel information for those traveling abroad or on Liberty-sponsored trips (e.g., an itinerary or log of travel excursions);
8. information about your use of our domains and online resources (e.g., the search terms used, pages you visit, and content you engage with on our website and other electronic communications);?
9. technical information collected from your computer or mobile device, network, and browser connections as enabled by user-settings (e.g., your IP address, browser type, operating system, geographic location, service provider, profile demographics); and
10. information about your engagement with Liberty's marketing delivered by third-party advertising partners or vendors through various media.

Personal data we collect from other sources

The following are examples of the categories of personal data we may collect from other sources:

1. personal, contact, or demographic details (as described above);?
2. application information we obtain from third-party application providers and recruiters (as described above);
3. employment information (e.g., confirmation of prior employment);
4. academic performance (e.g., transcripts, test scores, credential services, recommendations);?
5. financial information (e.g., financial aid eligibility, scholarship awards);
6. student-athlete eligibility status and related information;
7. student conduct information (e.g., complaints brought by you, against you, or those to which you may be a witness; information, such as reports, provided by other institutions or entities in relation to the prevention or identification of student misconduct and disciplinary actions; evidence used in investigations); and
8. feedback and other information from other institutions, entities, or homestay providers; entities with which you have interned or worked, and other institutions or entities with which you may interact during your time abroad.

Sensitive information about you we collect and use

Some of the categories of information we collect or process are considered special categories of information under applicable data protection laws (i.e., the GDPR).? In particular, we may collect or process the following types of sensitive information about you:

1. health and medical information, including medical records (e.g., medical history, physician's reports, counselor's reports, information about your health or medical treatment during your time abroad, immunization records, disabilities and related accommodations, allergies, dietary restrictions, health insurance information, records of emergency incidents);
2. religious or philosophical beliefs and affiliations (e.g., religious belief or church membership for alumni relations, resident enrollment, or the School of Divinity);
3. political beliefs;
4. racial or ethnic origin (including citizenship status);
5. information relating to unlawful activity (e.g., information collected from drug tests or employment-related background checks); and
6. information about facts and circumstances related to incidents or allegations of sexual misconduct (which may be collected in the context of investigations into or adjudications of incidents or allegations of sex discrimination, sexual harassment, sexual assault, dating/domestic violence, or related unlawful activity).

2. HOW WE USE YOUR PERSONAL DATA AND THE BASIS ON WHICH WE USE IT

We may use your personal data for the following purposes:

- Physical identification: We use your identification information, including the Liberty-sponsored identification card that includes your photograph, to physically identify you when you access certain Liberty-sponsored facilities or events. This processing is necessary to serve our legitimate interests in keeping our facilities safe and secure.
- Electronic identification and authentication: We use your identification information to verify your identity when you access our website or other Liberty-sponsored electronic services, including your myLU account. We may grant you access to our website and services in order to comply with our contractual obligations to you. Where there is no underlying contract, we verify your identity and authenticate you as a user in furtherance of our legitimate interests in ensuring the security of your personal data and the security of Liberty's systems.
- Reviewing applications: We use your personal data when you apply for admission to or graduation from Liberty; financial aid, including grants, scholarships, and loans; Liberty-sponsored programs, offerings, or services; employment; or other application-based opportunities through Liberty. Our basis for processing is often the performance of pre-contractual relations with you. Any processing outside the scope of a pre-contractual obligation is necessary to serve our legitimate interests in evaluating an applicant's personal, educational, financial, and/or professional background to make admissions, employment, or other decisions, and to compile statistical information to evaluate Liberty's diversity, affirmative action, and equal opportunity performance.
- Fulfillment: We use your personal data to provide the services or information you have requested. For example, we may process your information to respond to inquiries and subscription or purchase requests to manage your student account, including issuing invoices and processing payments; register you for courses or create a personalized class plan; facilitate your travel abroad with Liberty; provide you with access to and functionalities within our online library; or manage and facilitate networking opportunities, ongoing career services, and events and reunions. This is so we can provide the services or information according to our contract with you.

- Alumni and advancement communications:? We use your personal data with regard to our alumni and advancement networks.? For example, we maintain contact information for alumni and donors, employees, and other bases of relationships with Liberty so that we can send newsletters, donation requests, surveys, and events and volunteer opportunities that might be of interest to you.? We also compile information of past study abroad or foreign recruitment programs to track the geographical interest in various programs and offerings.? We initiate communications given your opt-in and opt-out selections on record for both media and subject matter, and rely upon your consent if required by applicable law.? Where we do not rely on consent, this processing serves our legitimate interests in fostering relationships with alumni for the benefit of Liberty and its students and faculty, maintaining alumni networks, communicating information about Liberty?s programs and successes to the general public, and supporting our fundraising efforts.
- Improving our resources and services:? We analyze information about how you use our resources and other related services, including educational product testing and operational analytics, to provide customizable services and improve user experiences across our facilities, resources, and services.? It is in our legitimate interest to use the information provided to us for this purpose so we can understand and improve on our programs, offerings, and services.?
- Improving our institutional effectiveness:? We may use your personal data to assess our performance as an institution, including analyzing retention and adaptive learning programs.? For example, we may analyze connections between students who excel academically and the electronic resources that those students accessed, and we do this to promote or improve specific resources.? We may also use your information for program development and the tracking of academic progression, or to understand alumni and donor interests, or improve our fundraising and outreach efforts.? It is in our legitimate interests to use the information provided to us for this purpose, so we can understand and improve on any issues with institutional programs, offerings, and services.??
- Responsively communicating with you:? We may use your personal data and interactions to improve services to you.? For example, if you contact us with questions or comments, submit additional opt-in or opt-out options (e.g., do-not-call requests, subscriptions options), act on a communication, or provide other insights, we apply the information to provide responsive actions and communications, such as acknowledgments, updates, next steps, and other related information.??
- Emergency communications:? We may use your personal data to respond to emergencies, for example, if we need to contact your emergency contact in the event of an incident.? This processing is necessary to serve our legitimate interests in supporting the health, safety, and well-being of individuals while participating in Liberty-sponsored opportunities or accessing Liberty-sponsored services.
- Marketing:? We may use your personal data to understand your preferences to help personalize the marketing messages and other content we provide you.? We also may use your photograph or likeness in our marketing materials.? It is in our legitimate interest to provide more relevant content and communications.? When necessary, we will obtain your consent before sending such marketing messages.
- Digital marketing:? We may use your personal data to enable us to reach consumers with greater efficiency and more relevant messages across various digital channels, including online, mobile, email, and addressable TV.? This processing is in our legitimate interest to provide more relevant content and communications.
- Safety and security:? We may use your personal data to keep our campus, our online collaboration spaces, and travel abroad programs safe and secure.? This processing is necessary to serve our legitimate interests in protecting our students and employees, as well as the employees, property, and facilities of our partner institutions.
- Keeping our records accurate and up-to-date:? This processing is necessary to comply with legal obligations and to serve our legitimate interests in efficient management and administration.

- Exercising our rights: We may use your personal data to exercise our legal rights when it is necessary or permissible to do so, for example, to detect, prevent, or respond to fraud or data breach, or to respond to claims in an investigation or lawsuit. Specifically, Liberty also has certain rights to disclose student personal data under the Family Educational Rights and Privacy Act of 1974 (FERPA) that it may exercise.
- Complying with our obligations: We may use your personal data to comply with legal or regulatory obligations, for example, to carry out fraud prevention checks; to respond to lawfully-issued subpoenas, search warrants, or court orders; or to provide notice of a data breach, when doing so is required by law. We also may use your information to meet the obligations of private entities with oversight over Liberty, such as accreditation organizations or the National Collegiate Athletics Association (NCAA), to serve our legitimate interest in maintaining accreditation or other status.

In addition to the purposes listed above, we may use certain categories of sensitive data in the following ways:

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- Health and medical information: To the extent we process your health and medical information, we do so to comply with legal obligations (e.g., to provide a disability accommodation) or when such processing is deemed necessary to protect the vital interests of you or another person. Depending on the context, such information may be processed with or without your consent.
- Information revealing racial or ethnic origin: To the extent we process information revealing racial or ethnic origin, such information is often voluntarily disclosed during the application process and is used by Liberty to compile statistical information to evaluate its diversity, affirmative action, and equal opportunity performance. In this instance, we rely on your express consent for processing.
- Religious or philosophical beliefs: To the extent we process information revealing religious or philosophical beliefs, such information is generally voluntarily disclosed and, where it is voluntarily disclosed, we will process it on the basis of your express consent. This information is voluntarily disclosed for purposes of statistical reporting related to diversity; in conjunction with your application to or participation in the School of Divinity; to facilitate foreign travel, work, or study; or for alumni relations purposes. There are certain programs within the School of Divinity that require an applicant's disclosure of religious beliefs for admission to those programs. Liberty employment applications also require disclosure of religious beliefs.
- Information relating to unlawful activity: To the extent we process information related to arrests, criminal offenses, or other unlawful activity (e.g., employment-related background checks, admissions applications, drug tests, disciplinary action based on arrest or conviction), we do so in accordance with applicable laws, including laws of the United States, the European Union, or EEA member states, to comply with legal obligations or, where not required by law, to serve our legitimate interests in selecting and maintaining a qualified and suitable student body and workforce, as well as in protecting the safety and security of our campus and systems.
- Information about facts and circumstances related to incidents or allegations of sexual misconduct: To the extent we process such personal data, we do so only in the context of investigations into or adjudications of allegations of sex discrimination, sexual harassment, sexual assault, dating/domestic violence, or related unlawful activity. Our basis for doing so is that the processing is necessary for the initiation, exercise, substantiation, or defense of legal claims, and that processing of sensitive information in this context serves a substantial public interest. To the extent such investigations do not specifically involve special categories of data as defined by EEA law, our basis for processing is that it is necessary to serve our legitimate interests in complying with our legal obligations.

We also may anonymize your personal data in such a way that you may not reasonably be re-identified, and we may use this anonymized information for any other purpose (e.g., campus climate surveys and other reports related to campus life and safety; reporting under Clery Act).

3. ??????? HOW AND WHEN WE SHARE YOUR PERSONAL DATA

We may share your personal data with third-parties under the following circumstances:

- Service providers and partners:? We may share your personal data with our third-party service providers and academic or business partners that perform services for us for the purposes set forth above.? For example, we may partner with companies that process secure payments, recruit prospective students, promote other offerings, equip operations, or facilitate your use of our website services (e.g., learning management system providers, IT providers, enrollment management providers).?? We may also use third party service providers and partners for network, security, communications, remarketing, and hosting services.? We also partner with third-parties around the world to execute our programs abroad, including LU Serve and LU Send; for example, study abroad providers or other foreign institutions involved in our study abroad programs, homestay facilitators, tour operators, or other academic institutions.? Our service providers and partners are required by contract to keep confidential the information received on our behalf and may not use it for any purpose other than to carry out the services they are expressly contracted to perform.
- Liberty University entities and affiliates:? To the extent we or our affiliates collect your information in-person in Europe, we may share your personal data with other Liberty or affiliate employees at facilities or programs in the United States or abroad.?
- Where required or authorized by law:? We may share your personal data with law enforcement agencies, regulators, courts, government authorities, or other third-parties where we believe doing so is necessary to comply with our legal or regulatory obligations, or to otherwise protect our rights or the rights of any third-party, or where we believe doing so is authorized by law.

Because we operate internationally, the recipients of personal data may be located outside the jurisdiction in which you are located (or in which we provide the programs, offerings, or services).? See the section below on international data transfers for more information.?

4. ??????? AUTOMATED DECISIONS ABOUT YOU

The way that we analyze and use personal data for the purposes of performing certain Liberty functions related to recruitment, admissions, student financial services (including financial aid), on-campus housing, enrollment management (including success and retention), and athletics participation may involve profiling, which means that we may process your personal data using software that is able to evaluate certain characteristics about you and predict risks or outcomes.? Liberty may also use profiling, or otherwise employ solely automated means, to make decisions about you that relate to your admissions and financial aid eligibility (e.g., financial aid packaging), registration (e.g., auto-enrollment for pre-selected courses), academic standing (i.e., determining good academic standing, academic warning, or academic suspension), financial aid standing (e.g., determining good financial aid standing, financial aid warning, or financial aid suspension), student-athlete eligibility under NCAA rules, housing (e.g., on-campus housing requirements, housing assignments, roommate matches), degree audits, payment plan options (including automatic drafts and deposits), and applying source code discounts and personal preferences.? This is known as ?automated decision-making? and, in accordance with applicable laws of the European Union and EEA member states, is only done when we have a legal basis for this type of decision-making.

We may make automated decisions about you:

- where such decisions are necessary for entering into or fulfilling a contract.? For example, with respect to housing assignments, financial aid packaging, and payment plans;
- where such decisions are required or authorized by law; or
- where you consent to us carrying out automated decision-making.

Subject to applicable local legal requirements and limitations, you may contact us at the contact information below to request more information about automated decision-making, object to our use of automated decision-making, or request an automated decision to be reviewed by a person.

5.????????? HOW WE USE COOKIES

When you use or access Liberty?s website and emails, including related online services offered by Liberty, we automatically collect certain information about your device and your use of Liberty?s website.? To do so, we use "cookies", web beacons, relevant Internet technologies, and other device-identifying technologies (text files) that may be saved onto your computer or mobile device.? These device-identifying technologies allow an analysis of your use of our emails and web resources, and allow us to accomplish the uses set out above, as well as to deliver sites messaging and to keep track of your information.?

What are cookies??

Cookies refer to all technologies that store and access information on the device that you use to access our emails and our web resources, such as your computer, tablet, or mobile phone.? Cookies help us analyze web traffic, remember your preferences, personalize your use of our website, provide measurement services, target ads relevant to you and your interests, and apply frequency capping for ads (e.g., to ensure we do not display the same advertisement to you repeatedly).??

There are different types of cookies, which include:?

- Cookies served directly by Liberty ("first-party cookies") and cookies served on our behalf, for example, by data analytics companies ("third-party cookies");?
- Cookies that endure for different periods of time, including those that only last as long as your browser is open (referred to as "session cookies").? Session cookies are deleted automatically once you close your browser.? Other cookies are called "persistent cookies" meaning they survive after your browser is closed.? For example, they recognize your device when you open your browser and browse the internet again.?

Which cookies do we use and why do we use them??

Information collected automatically about your device and your use of Liberty?s website may include the following:

1. your Internet Protocol (IP) address;
2. your Browser type (e.g., Chrome, Firefox, etc.);
3. your computer's operating system (e.g., Windows, Macintosh, etc.);
4. your Internet domain;
5. your device (e.g., iPhone, Tablet, etc.);
6. URLs of the websites from which you came to our website;
7. webpages on our website that you visit, including date and time of access;
8. your geographic vicinity and other demographic and interests information;
9. cookie collection date;
10. the day of the week and time of your use;
11. your language setting;
12. your country, state, designated marketing area (DMA), and city (relating to the IP address, if available);
13. the webpages you visit;
14. your email clicks and other related actions;
15. the publisher's name; and
16. other personal data, which may include sensitive information with your consent, specified herein.

Liberty uses first-party cookies, such as ServiceNow, Tableau, CRM, and CE12, to facilitate the running of the Liberty University website.

Liberty also uses analytics and advertising (third-party) cookies from external services, including Internet web browsers, social media, and partner offerings. Specifically, Liberty collects and uses cookies from the following external services: ADFS, ADNXS, APEX, OPUS, Eloqua, Blackboard, Qualtrics, Service Now, Sodexo, Online Degrees Microsite, WebEx, CE12, MyLU, SSO, AudienceView, Online-at-Liberty University Microsite, PubMatic, Liberty Flames, Advertising.com, Demdex.net, Yahoo.com, Eversttech.net, WordPress, Visual Website Optimizer, Adobe paid search, Google paid search, Bing paid search, Double Click, Google Analytics, Facebook, Snapchat, and LinkedIn. These external services offer information about their use of cookies and user options, and we recommend you consult their resources. For example, more information is currently available about cookies and user options related to Google Analytics via the following web-link: <https://support.google.com/analytics/answer/6004245?hl=en> for Google Analytics and <https://support.google.com/analytics/answer/1012034?hl=en> for GA Audiences. Please note, however, that the resources and/or content on external websites are subject to change and that those changes may affect Liberty's collection and use of cookies.

Liberty is not responsible for the privacy practices of external service providers nor is Liberty responsible for the content of any websites that are not operated by or exclusively for us. Users should use caution when accessing these external services.

How can you exercise your cookie choices?

Cookies, web beacons, relevant Internet technologies, and other device identifying technologies (text files) reside on your device and/or browser and can be removed by you. You have the right to reject the use of some or all of the cookies used on Liberty's website. Please refer to your browser's Help file for the steps required. You can also opt out of using such device identifying technologies entirely. Please note that modifying browser settings to reject some or all cookies may impact user experience on the Liberty website, for example, by making the website less efficient. Modification may also impact the delivery of personalized content as explained above.

6. ??????? HOW TO EXERCISE YOUR RIGHTS

You have certain rights regarding the personal data we hold about you. These include the rights to access, correct, delete, restrict or object to our use of, or receive a portable copy in a usable electronic format of your personal data. Where we are using your personal data on the basis of your consent, you have the right to withdraw your consent at any time. You also may have a right to make a complaint to your local data protection or privacy regulator.

Please note that we may require additional information from you before we can honor your requests, such as information to verify your identity.?

If you would like to discuss or exercise any of your legal rights, please contact us at the contact information below.

7. ???????? HOW YOUR PERSONAL DATA IS PROTECTED AND STORED

We promote and implement technical and organizational measures designed to ensure a level of security appropriate to the risks to the personal data we collect and process. These measures are aimed at ensuring the ongoing integrity and confidentiality of personal data.

We retain certain personal data for as long as we have a relationship with you and other information for as long as needed for us to preserve historical records regarding applications; scholarship, grant, and financial aid allocations; alumni networks; disciplinary history and campus bans; major, enrollment status, academic standing, financial aid status, and graduation information; and other record archives relevant to Liberty. When deciding how long to keep your personal data, we take into account our legal obligations and our legitimate interest in maintaining such records. We may also retain records to investigate or defend against potential legal claims. We may delete your personal data when it is no longer required for these purposes.

Please note that personal data about admitted and matriculated students is retained beyond graduation (or after the student's studies otherwise end).

8.????????? INTERNATIONAL TRANSFER OF YOUR PERSONAL DATA

Your personal data may be transferred to, stored, and processed in a country (such as the United States) that is not regarded as ensuring an adequate level of protection for personal data under the laws of the European Union or certain EEA member states.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to provide adequate protections for your personal data when we transfer it to a third-party in such a jurisdiction. For more information on the appropriate safeguards in place and to obtain a copy of such safeguards, please contact us using the contact information set forth below.

9. ???????? HOW TO CONTACT US

If you have any questions or concerns regarding the way in which your personal data has been or is being used, please contact Liberty University's IT HelpDesk by telephone at (434) 592-7800 (local) or (866) 447-2869 (toll-free). You may also contact the Registrar's Office by telephone at (434) 592-5100 or by email at registrar@liberty.edu. For the purposes of this privacy notice and complying with the European Union's General Data Protection Regulation, the University's Data Protection Officer is the Chief Information Officer & Vice President of Analytics.

We are committed to working with you to obtain a fair resolution of any complaint or concern about your privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right (where applicable) to make a complaint to the appropriate data protection authority. Contact information for the EU data protection authorities can be found [here](#).

10. ?????? CHANGES TO OUR PRIVACY NOTICE

Liberty may modify or update this privacy notice from time to time. If we make any revisions that materially alter the ways in which we process your personal data, we will take reasonable steps to notify you of such changes. You may always visit our website to view the most up-to-date version of this privacy notice.

LAST UPDATED: 9-19-2019