Volume II: 2.6 Marketing and College Communications Policies

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2.6  Marketing and College Communications Policies

2.6.1 College Advertising and Marketing Policy

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PURPOSE

The purpose of this policy is to ensure a consistent public image of Canisius College and to establish the authority for the approval of advertising and marketing collateral to external audiences on behalf of the college, its events, or its programs.

POLICY

Brand advertising for Canisius College, its events, and its programs that targets an external audience may only be created by the Office of Marketing and Communication and approved partners and agencies. Final authority as to the nature of the material to be published and the distribution of the materials is reserved to the appropriate Senior Leadership Team member. Internal communication must also adhere to the standards set forth in the Canisius Brand Guide as applicable.

Exclusions: Employment advertising placed by Human Resources and the Office of the Vice President for Academic, as well as posting information related to ongoing campus activities, events, and notices of interest exclusively for on-campus audiences on campus easels, etc. are excluded from this policy. Such advertisements, however, must adhere to the branding guidelines set forth in the Canisius Brand Guide as applicable.

DEFINITIONS

Advertising—any message created and displayed for the sole purpose of promoting the college, its events, or programs in any of the following mediums: national/local broadcast and cable TV, national/local radio, commercial Websites, consumer magazine print, newspaper print, trade professional magazine print, professional journals and newsletters (that accept paid advertising), outdoor signage (billboards), digital advertising including display, keyword search, paid social, texting and various forms of mobile advertising, (MW) : transit signage (subway and bus poster/cards, bus shelters, subway stop posters), recruitment posters, program reference guides, college student newspapers, sponsorships, and cross-promotion identification.

PROCEDURES/GUIDELINES

Advertising Requests

The Office Marketing and Communication must be contacted with any requests for advertising for the college, its events, and its programs. Contact Marketing and Communication for specific advertising needs.

Procedures for the Approval of Student Recruitment Marketing Materials

Recruitment of students is the responsibility of the Office of Admissions. Based on data provided by the Office of Research and Institutional Effectiveness and other sources, as well as participation from Academic Affairs, the Office of Admissions works with the Office of Marketing and Communication to develop recruitment and admissions marketing materials to ensure that they accurately reflect the college’s programs and admissions standards and that all student related data made public by the college is otherwise accurate and complete, including student achievement of learning and student persistence, retention, and completion data.
Procedures for the Approval of Athletic Department Recruitment Materials

The NCAA has many rules governing the use of athletics-related printed materials for use in recruiting and distribution off campus. This includes media guides, posters, brochures, and other materials. Please contact the Canisius College Office of Athletics for any questions relating to the use of athletics-related printed recruiting material or Athletic logos.

Procedures for the Approval of All Other College Marketing Materials

All other, non-admissions or athletic recruitment related marketing materials targeting external audiences and purporting to represent Canisius College, its departments, offices, clubs/organizations, or programs must be produced under the direction of the Office of Marketing and Communication. Marketing and Communication will ensure that the materials are consistent with the college’s mission and objectives, as well as compliant with the guidelines set forth in the Canisius Brand Guide. Final authority as to the nature of the material to be published and the distribution of the publications is reserved to the appropriate area vice president.

RELATED POLICIES

Use of the College Name, Seal, and Logos Policy

Posting Policy for Flyers, Signs, Banners, and Table Tents

2.6.2 College Web Presence Policy

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PURPOSE

The purpose of this policy is to establish authority, responsibilities, and actions that assure that Canisius College’s presence on the world wide web supports and promotes the college’s mission.

POLICY

All aspects of the Canisius College web presence represent official communications from the college to the public and must adhere to college policies and standards regarding both content, branding, and technical structure.

Canisius College’s conduct policies—including all copyright rules and restriction on the use of written, graphical, video, and audio materials and data, and standards and requirements for acknowledgment of sources in academic work—as stated in the Canisius College Policy Manual and other applicable policy documents—must be met in all aspects of the College’s Web presence.

The Office of Marketing and Communication maintains governance authority for all website content and reserves the right to remove or modify content that is inconsistent with the college’s website standards.

DEFINITIONS

Web Presence—Encompasses any form of content that may be presented via the web or social media platform on college, college-affiliated, or individual or personal webpages or social media platforms.

College Webpages—any webpage or social media platform under the direct control of Canisius College that represent the official voice of the college to all internal and external audiences including prospective students, current students, alumni, employees, friends of the college and the general public.

College-affiliated Webpages—any webpages or social media platform developed, maintained or hosted by entities other than Canisius College but referenced or used by the college to conduct official business or represent the official voice of the college in accordance with the college’s mission.

Individual Webpages—any webpages or social media platform developed and maintained by college departments, work study students, or employees for the purpose of communication related to the department, work study student, or employee’s affiliation with the college and the college’s mission.

PROCEDURES/GUIDELINES

Notification

Individuals are requested to report violations of this policy to the Office of Marketing and Communication.
Enforcement
Office of Marketing and Communication staff may remove or modify any textual or multimedia content, webpages, or external links from college, college-affiliated, or individual webpages or social media platforms that violate college policies and standards, or local, state, federal, or international laws.

Sanctions
Marketing and Communication staff may refer violators of this policy to the appropriate administrators for disciplinary action.

RELATED POLICIES
Use of the College Name, Seal, and Logos Policy
Social Media Policy

2.6.3. Contact with Government Agencies Policy

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PURPOSE
The purpose of this policy is to establish policy guidelines and procedures governing official college interactions with state and federal legislators and governmental agencies by members of the college community.

POLICY
Subject to specific control by the Board of Trustees, all official interactions on behalf of Canisius College (including the college’s schools, departments, divisions, offices, centers, programs, etc.) with government offices, boards, agencies or legislators are subject to the direction of the college president or an authorized designee. Individuals seeking to officially interact on behalf of the college with such offices, boards, agencies or legislators must be authorized to do so by the president.

Personal Contacts
Contacts with government officials and staff of a personal nature, whether in writing or in person, must be made in the name of the individual making the contact and may in no way imply that the contact is being made on behalf of the college. College letterhead and email may not be used in presenting a personal view in such cases.

Professional Contacts
Professional contacts with government officials and staff, whether by letter, email, telephone, social media, or in person, must be done in the name of the individual making the contact or on behalf of the applicable professional society, and not on behalf of the college. Reference to affiliation with the college may be made as an aid to identification.

DEFINITIONS
Not applicable.

PROCEDURES/GUIDELINES
I. Invitations to Government Officials
The college president is to be informed in advance of invitations to government officials and/or their staff to visit any campus or facility of the college in their official capacity to ensure coordination with key college offices and awareness of political sensitivities.

II. Official Requests from Government and Accreditation Officials
When requests for information, expertise, resources, or visits are received from governmental officials and/or staff for the purposes of gathering information and/or making assessments of college activities, college offices must notify the college president for assistance with the request, including coordination with relevant college offices, as appropriate.
III. Other Activities Requiring Advance Approval

Members of the college community must also contact the college president prior to any interactions with government officials under the following circumstances:

1. Would like to make a gift to a government official, including the purchase of a meal;
2. Are considering directly contacting a government official with respect to legislation or executive actions or decisions on government policies, programs or regulations; or with respect to government funding, including contracts and grants (note exclusions below);
3. Are considering indirectly contacting a government official, through avenues such as the media or other “grassroots lobbying”, in attempt to influence actions or decisions regarding legislation or executive actions or decisions on government policies, programs or regulations; or with respect to government funding, including contracts and grants (note exclusions below).

The president or a designee will review the proposed interaction, which may be reportable on city, state, or federal levels, and will provide guidance on the interaction.

IV. Exclusions

Faculty and non-faculty researchers as well as staff in Institutional Advancement who are assisting government officials do not need to seek authorization from the college president prior to engaging in the following interactions: (a) the provision of policy expertise or testimony in the researcher’s field of expertise; (b) contact with program and grant/program officers to discuss prospective or ongoing governmental funding projects that have been, or will be, awarded through a competitive review process.

Members of the college’s faculty should be in contact with Institutional Advancement when approaching government officials regarding funding.

RELATED POLICIES

Political Activities and Speakers Policy
Standards of Ethical Conduct

2.6.4 Media Relations Policy

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PURPOSE

The purpose of this policy is to establish college policy, guidelines, and procedures pertaining to official college communications with members of the media.

POLICY

The president of Canisius College is the official public spokesperson on all matters of policy relating to Canisius College. No one other than the president may engage with the media unless so authorized by the Office of College Communications.

All media inquiries or calls must be referred to the Office of College Communications.

Canisius College has many contact points for internal and external constituents seeking information and referrals about college services, programs, and activities. It is difficult for individual departments to be aware of all aspects of college operations. Consequently, the Office of Marketing and Communication is responsible for all activities involving brand development, advertising, collateral production, digital and social media. The Office of College Communications is responsible for publicity, media relations, and creation of communication materials for internal and external audiences. The Office of College Communications provides centralized information and referral services for the college. In this role, the Office of College Communications and its designees are responsible for all contacts with print and electronic news media not involving College athletics, including direct personal contact, information relayed through news releases and other written communications, and the release of photographic and video images of the college. As the college’s primary liaison with local, regional, national, and international media for all non-athletic department content, the Office of College Communications provides accurate information and coordinates communications with campus-based and external media. It also provides public information support and advice to all employees, including faculty.

The Office of College Communications and its designees also assist the president in responding to and initiating media contacts and will, under the president’s direction, disseminate any statements of policy.
The Office of College Communications may call upon certain administrative and academic personnel to issue information in an attempt to ensure accuracy or expert commentary on particular matters. In those cases, the Office of College Communications will assist, in an appropriate manner, those so designated.

All media inquiries must be referred to the Office of College Communications. The Office of College Communications will determine who is best to represent the College as an expert.

Requests for media interviews with coaches and student-athletes pertaining to pre- or post-game athletics activities are coordinated through the Office of Athletics and/or at the coaches’ discretion. Media representatives seeking interviews with athletics personnel can contact the assistant athletic director of athletics for sports information and operations.

DEFINITIONS

Issues of General College-wide Impact or Significance—issues regarding Canisius College, individual members of the college community, or higher education policies and trends. Examples may include, but are not limited to: a campus crisis or emergency, student or employee issues, financial matters, or campus infrastructure.

Media—the various means of mass communication as a whole, include, but not limited to: television, radio, magazines, newspapers and web/electronic outlets, social media, together with the people involved in their production.

PROCEDURES

News Releases

The Office of College Communications promotes the college and its schools and departments regarding special accomplishments, events and activities, programs and plans. All news releases intended for off-campus or external audiences must be issued and disseminated through the Office of College Communications.

Requests for Photographs and Video

The Office of College Communications maintains a large number of still images and a growing video library of campus scenes, landmarks, and events. Any requests from news organizations or other media for photographic images, including video, must be directed to that office. In some cases, a formal Release Form may need to be completed.

Media Solicitation

Since positive media solicitation is an integral element of the college’s communications program, any ideas for articles or pieces that would positively portray the college, its work or its community should be directed to the Office of College Communications. In a similar manner, the Office of College Communications should be notified about negative occurrences that are likely to rise to the level of a news story.

Guidelines for communicating with the media include the following:

- Obtain the name of the person inquiring, the media organization and, if available, the anticipated time of release of information in the print, online or broadcast outlet. This information should be included when the notification is made to the Office of College Communications;
- Inform the individual that a member of the college communications team will follow up regarding the inquiry. Promptly contact the Office of College Communications with all information;
- Do not offer speculations or gossip;

RELATED POLICIES

Crisis Response Plan TBA

2.6.5. Photography, Digital Recording, and Filming Policy

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<th>PHOTOGRAPHY, DIGITAL RECORDING, AND FILMING POLICY</th>
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<td>Effective Date: May 6, 2019</td>
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<td>Policy Number: II – 2.6.5</td>
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<td>Supersedes: Not Applicable.</td>
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<td>Issuing Authority: President</td>
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<td>Responsible Officer: AVP for Marketing and Brand Engagement</td>
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<td>Applicability: All members of the Canisius College community.</td>
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PURPOSE

The purpose of this policy is to clarify under what circumstances photography, digital recording, and filming on the Canisius College campus is permitted.
POLICY

Photography and Filming by Outside Businesses and Hobbyists

Outside businesses (e.g., media professional photographers or videographers, organizations, and companies) and hobbyists occasionally seek authorization to film or photograph a particular site or building at Canisius College’s campus. Any requests for filming and/or photography by outside businesses and hobbyists on college property must be submitted in writing to the Office of Marketing and Brand Engagement, which reviews them in consultation with the college president, to determine whether they are compatible with the college’s mission and goals. The Office of Marketing and Brand Engagement reserves the right to deny requests that reflect negatively on the College or will interfere with its routine operations. The Office of Marketing and Brand Engagement in consultation with the appropriate member of the Senior Leadership Team then makes the final determination on whether requests will be accommodated.

Individuals receiving a request for filming or still photography on campus must direct the individual to the Office of Marketing and Brand Engagement.

Amateur Photography and Filming by College Community Members and Guests

Amateur photography, recording, and filming by members of the college community and their guests at college sanctioned events considered open to the public (i.e., commencement) is generally permitted provided the consent of the subject(s) has been obtained. Consent is not required when the individual is photographing, recording, or filming general crowd shots of an event. Otherwise, such activities must be conducted in a non-disruptive manner and in compliance with applicable college policies.

Photography and Video (i.e., Digital Images) Consent

Current students, faculty, staff, and alumni of the College: Canisius students, faculty and staff are advised that the Office of Marketing and Brand Engagement takes photographs and video recordings throughout the year in various locations on and off campus. These photographs and video recordings often include the names, images, voices and likenesses of Canisius students, faculty and staff. Canisius reserves the right to use these photographs and videotapes as part of its publicity and marketing efforts without the expressly-written consent of the above-mentioned individuals. Additionally, students who enroll at Canisius do so with the understanding that these photographs and videotapes might include their names, images, voices and likenesses, and such photographs or videotapes might be included, published, or used in Canisius publications including print, broadcast, or electronic media, for publicity, commercial, or marketing purposes. Enrollment at Canisius constitutes students’ consent to the inclusion, publication, or use of their names, images, voices, and likenesses, taken while enrolled at Canisius, for publicity, commercial, promotional or marketing purposes, with unlimited use and for an unspecified time period.

Individuals who are not Canisius students, faculty or staff: Photographs and video recordings taken by Canisius staff that include the names, images, voices and likenesses of individuals who are not Canisius students, faculty or staff may only be used for publicity, commercial, promotional or marketing purposes after a signed consent form from those individuals is obtained.

Use of photos and video recordings supplied by students and/or faculty: Any photographs or video recordings supplied to the Office of Marketing and Brand Engagement by students, faculty, staff, alumni, friends of the college or contractors become the property of Canisius College and may be used freely for publicity, commercial, promotional or marketing purposes, provided the subject’s consent (if required) has been obtained.

DEFINITIONS

Filming and Digital Recording—the capturing of moving or still images of college property by any means on any media now known or that may be invented in the future including, but not limited to, film, videotape, digital memory, or any electronic transmission to another medium or to the Internet.

Photography—the capturing of still images onto any compatible medium, or posting to the Internet, by any means or devices now known or that may be invented in the future including, but not limited to, film cameras, digital cameras, electronic devices such as personal computers, mobile phones, iPads, etc.

PROCEDURES/GUIDELINES

Conditions of Approval

Regardless of the type of photography, recording, or filming requested by an outside business or hobbyist, if the request is granted approval, the approved entity may only photograph, record, or film in those areas and during the time frames authorized by the Office of Marketing and Brand Engagement. In addition, individuals must obtain the permission of the subjects of their photography, recording, or filming.

Prior to the date of the shoot, the Office of Marketing and Brand Engagement will be responsible for: (a) assuring an individual employed by the college is in attendance when the individual, group, or organization makes use of the college facility or grounds; and (b) notifying Public Safety and other college departments of the upcoming shoot.

RELATED POLICIES

Social Media Policy.

2.6.6. Social Media Policy
The purpose of this Policy is to establish clear guidance for creating and approving content pertaining to Canisius College (including the college’s departments, divisions, offices, centers, programs, etc.) on any publicly available social media site. In addition, guidelines are provided to the general campus community regarding personal use of social media.

**POLICY**

Canisius College’s official presence on social media platforms is overseen by the Office of College Communications. Websites and/or accounts that purport to represent information as Canisius College or its subdivisions—in name or image, including the college seal or its logos—will be contacted for immediate removal of accounts.

All official college social media sites and official college communications, including but not limited to the account itself, content, followers, subscribers, and contacts are the property of Canisius College. Members of the college community have no ownership rights whatsoever to an official college social media site.

The college does not govern or regulate content on personal social media sites by members of the college community. However, to the extent the use of personal social media sites may reasonably be construed as implying the support, endorsement, or opposition of the college, members of the college community must distinguish their personal views from those that they are authorized to express on behalf of the college. Members of the college community are also reminded that violations of law or college policy conducted through social media sites, or evidence of violations posted on social media sites of which the college is made aware, may be subject to disciplinary and/or legal action, regardless of whether a personal account or official college social media site is used.

**DEFINITIONS**

*College Data*—any information collected, manipulated, stored, reported, or presented in any format, on any medium, at any location by any department, program or office of the college in support of the college’s mission.

*College Work Product*—includes any and all log-in information, data, passwords, trademarks, and content related to an official college social media site, including all followers, subscribers, and contacts. College work product, however, does not include social media sites or accounts that are created or used by a member of the college community exclusively for personal use.

*Copyrightable Works*—an original work of authorship that has been fixed in any tangible medium of expression from which it can be perceived, reproduced, or otherwise communicated, either directly or with the aid of a machine or device. Copyright includes a bundle of rights: the right to make reproductions of the work, the right to distribute copies of it, the right to make derivative works that borrow substantially from a copyrighted work, and the right to make public performances or displays of most works.

*Covered Data and Information*—means all information required to be protected under the GLBA, including Student Financial Information. In addition to this coverage, which is required under federal law, the college chooses as a matter of policy to also include in this definition any credit card information received in the course of business by the college, whether or not such credit card information is covered by GLB. Covered Data and Information includes both paper and electronic records. Covered Data and Information is classified as Private, Highly Restricted College Data pursuant to the Data Classification Policy.

*Intellectual Property*—means certain creations of the human mind that are granted legal aspects of a property right. These property rights include patents, copyrights, trademarks, trade secrets, and any other such rights that may be created by law in the future.

*Members of the college Community*—includes any person who is a student, faculty member, staff member, organization, club, group, team, alumni, volunteer, trustee, or any other person employed by the college.

*Official College Communications*—communications done in the name of the college on a social media site.

*Official College Social Media Site*—a social media site or account that is created or used by a member of the college community in the name of the college or a college department, program, team, or officially recognized college club, group, or organization (collectively “college” or “college work product”) or to promote and/or market the college, including accounts featuring or displaying the college’s name and trademarks (collectively “College Work Product”).

*Private College Data*—any College Data classified as Private-Highly Restricted and Private-Restricted pursuant to the Data Classification Policy.

*Private-Highly Restricted*—College Data that are not public and are available within the college only to those with a legitimate need to know and are so highly sensitive that the loss of confidentiality of the data could either (a) cause significant personal, college, or other harm or (b) a law, regulation or contract require a high degree of security. **Examples of Private-Highly Restricted College Data include, but is not limited to:**

- Personally Identifiable Information or PII: any information about an individual that (i) can be used to distinguish or trace an individual’s identity, such as name, date and place of birth, mother’s maiden name or biometric records, (ii) is linked or linkable to an individual, such as medical, educational, financial and employment information, which if lost, compromised or disclosed without authorization, could result in harm to that individual; and (iii) is protected by federal, state or local laws and regulations or industry standards.
- Covered Data and Information within the meaning of Title V of the Gramm Leach Billey Act of 1999 (Public Law 106-102, 11 Statute 1338) (as amended) and its implementing regulations.
- Human subjects research data or other sensitive research data.

*Human Subjects*—any College Data classified as Private-Highly Restricted and Private-Restricted pursuant to the Data Classification Policy.
College Data that by law are not public and are available within the college only to those with a legitimate need to know but are not so highly sensitive that the loss of confidentiality of the data would cause significant personal, institutional, or other harm, and no law, regulation, or contract require a higher degree of security. Examples of Private-Restricted College Data include, but is not limited to:

- Protected Health Information or PHI: Individually Identifiable Health Information that is transmitted or maintained by the college in electronic or any other form or medium as defined by Health Insurance Portability and Accountability Act (HIPAA).
- Payment card information regulated by the Payment Card Industry Data Security Standard (PCI DSS).
- Legal investigations conducted by the college.

Private-Restricted: College Data that by law are not public and are available within the college only to those with a legitimate need to know but are not so highly sensitive that the loss of confidentiality of the data would cause significant personal, institutional, or other harm, and no law, regulation, or contract require a higher degree of security. Examples of Private-Restricted College Data include, but is not limited to:

- Student Directory Information (if student has requested non-disclosure (suppressed): name, address, email address, telephone/mobile device number, dates of enrollment/registration, enrollment/registration status, major, adviser, college/school, class, academic awards and honors received, and degree received.
- Student Non-Directory Data: grades, courses taken, class schedule, test scores, advising records, educational services received, disciplinary actions, student ID number, immunization records, career services records.
- Linking a library patron’s personal identity with materials requested or borrowed by the person or with a specific subject about which the person has requested information or materials.
- Donor and gift data.
- Location of assets (e.g., specific information on where the college physically or electronically stores data, or technology that must be protected).
- Passwords, PIN numbers, or other types of authentication (e.g., multi-factor/two-factor, biometrics).
- Trade secrets or intellectual property.
- Sealed bids.
- Unpublished research data that have not been made public, such as de-identified data or proprietary research materials.

Social Media—includes the various online technology tools that enable people to communicate easily via the Internet to share information and resources. Social media can include blogs and social networking sites like Facebook, Twitter, Instagram, YouTube, Snapchat, and LinkedIn. In addition, any web application, site, or account maintained by Canisius College that facilitates an environment for employees, students, and alumni to share information and opinions in an interactive way is included in this definition.

Trade Secrets—includes all information including, any formula, drawing, pattern, compilation lists, program, device, method, technique or process that derives independent economic value, actual or potential, from not being generally known to and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

PROCEDURES/GUIDELINES

I. Official College Social Media Sites

All official college social media sites must be authorized in accordance with the Approval Procedures set forth below in Paragraph I.A. Any official college social media site which does not receive prior authorization will be subject to review when discovered and may be amended or removed at the discretion of an account administrator designated pursuant to Paragraph I.A or the Office of College Communications or the Athletics Communications Office, as applicable.

A. Approval Procedures

A request for an official college social media site must first have the written approval of the applicable department head, then final written approval by the Office of College Communications. If the presence or participation on social media sites involves a college athletic program, the request must be approved by the Athletics Communications Office.

Once the social media site has been approved, the approving department head must assign at least two staff or faculty members and one member of the Office of College Communications or Athletics Communications Office as account administrators. These individuals must be faculty or staff. Account administrators may delegate social media responsibilities to enrolled students, but a student may not have full administrative access to any official college social media site.

B. Responsibilities

1. Account Administrator Responsibilities

Account administrators for an approved official college social media site are responsible for:

1. Regularly monitoring content and postings for correctness and accuracy;
2. Monitoring communications and comments for acceptability in the college workplace and campus community. All posts, comments, and actions on the site have the ability to affect the reputation of the college as well as other individuals affiliated with Canisius;
3. Protecting Private College Data and intellectual property rights of others and the college. This includes, but is not limited to, intellectual property, operating plans, student financial data, protected health information (PHI), FERPA protected student records, donor information, employee information, home addresses, phone numbers, and social security numbers. Such data may not be posted on an approved official college social media site;
4. Monitoring and removing content that is illegal, obscene, defamatory, harassing, discriminatory, threatening, or an invasion of privacy;
5. When required by college policy or law, obtaining the expressed consent of involved parties prior to distribution or publication of recordings, digital images, videos, text, slideshow presentations, artwork and advertisements whether those rights are purchased or obtained without compensation;
6. Monitoring content for compliance with the college’s Brand Guide and removing content that does not comply;
7. Monitoring content for compliance with all federal and state laws, regulations, and college policies, removing content that does not comply, and reporting violations to the applicable campus authorities and/or law enforcement;
8. Monitoring content for compliance with the social media site’s terms and conditions for use and removing content that does not comply;
9. Minimizing security risks by:
   a. Utilizing strong passwords in accordance with the college’s Password Policy;
   b. Activating multi-factor authentication for all accounts where it is available;
   c. Registering the account using only official college email address;
   d. Regularly monitoring the site; and
   e. Changing passwords and updating/adjusting account administrator roles immediately when an account administrator or editor, especially students, has left the college and no longer is authorized to access to the official college social media site; and
   f. Deactivating a dormant account.
2. Office of College Communications and Athletics Communications Office Responsibilities

The Office of College Communications or Athletics Communications Office as applicable oversees the college’s institutional presence on official college social media sites and determines whether to approve official college social media sites as they become available. In addition, these offices routinely review in collaboration with account administrators’ official college social media sites for compliance with this policy, instruct account administrators to correct, modify, suspend, or terminate official college social media sites that are not in compliance with this policy, and suspend or terminate official college social media sites, where appropriate.

It is the policy of the college to address a policy violation by working with account administrator in a fair and equitable manner to prevent a recurrence prior to terminating an account. The college, however, reserves the right to immediately terminate an account even if the policy violation constitutes a first offense. In such cases, written notice of the account termination action will be provided to the account administrator by the applicable office.

3. Members of the College Community Responsibilities

Members of the college community are responsible for refraining from creating, using, or posting to official college social media sites in violation of this policy. Moreover, they are expected to surrender access to official college social media sites, as appropriate, when college status changes.

C. User Agreements for Official College Social Media Sites

Whenever an Official College Social Media Site is approved and created, the Social Media outlet requires the account creator to agree to certain terms and conditions for use of the site by clicking “Yes” or “I accept” as part of the account creation process. These are legal contracts, and they often contain terms and conditions that create risks for the account creator and the College (for an official college social media sites). Account administrators are delegated authority to create an official college social media site through completion of the application process and approval by the Office of College Communications or Athletics Communications Office, as applicable.

College account administrators are not authorized to enter into advertising agreements with social media sites without prior authorization and approval obtained by contacting the Office of College Communications or Athletics Communications Office, as applicable. Any member of the College community desiring to purchase advertising services from a social media site must follow all applicable policies governing both the public relations considerations and the procurement and contracting considerations related to such services.

D. Ownership of Social Media Work Product

All official college social media sites, accounts, developments, and intellectual property created or used by a member of the college community for the college as a result of the performance of assigned college duties or with the significant use of college facilities, resources, and/or personnel or to promote and/or market the college, including accounts featuring or displaying the college’s name and trademarks (collectively “College Work Product”), belong solely to the college. The college owns and has the right to control all College Work Product whether the member of the college community opens the account or uses, manages, or access it. The college does not require or request members of the college community to provide personal social media account information or passwords in accordance with applicable laws.

Upon the college’s request by the college or immediately after separation from the college, members of the college community are not authorized to access, use, update, or modify the College Work Product unless written authorization is granted by the Office of College Communications or Athletics Communications Office, as applicable.

Upon separation from the college, the college will retain ownership and control of all College Work Product created or used during the individual’s affiliation with the college, including all related data and information.

Any member of the college community with access account to an official college social media site agrees to provide to the area vice president the login information, including the usernames and passwords, for College Work Product created, modified, or used upon creation of the account. When passwords are updated, the area vice president must be provided the new password.

Note: Whether a College Work Product has been developed by a member of the college community as a result of the performance of assigned college duties or with the significant use of college facilities, resources, and/or personnel shall be determined in accordance with the college’s Intellectual Property Rights and Ownership Policy.

E. User Generated Content on Official College Social Media Sites

The college is not responsible for comments or posts made by followers of or visitors to official college social media sites. Comments posted by these individuals may not reflect the official views or policies of the college. Accordingly, official college social media sites that permit followers or visitors to share comments and other user-generated content must contain a disclaimer stating that any such user-generated content does not reflect the opinions or views of the college, its trustees, officers, or employees. Such disclaimer must be published in the account’s “about” section.

The college reserves the right to block, remove, or delete from an official college social media site any and all posts, comments, links, images, video, music, or other content for any reason. Examples of posts, comments, links, images, video, music, or other content that may be blocked, removed, or deleted, include, but are not limited to, those that:

1. Incite unlawful discrimination, violence, or harassment or are defamatory, obscene, or threatening;
2. Are irrelevant to the topic of the posting;
3. Incorrectly creates an appearance of an endorsement by the college;
4. Targets or disparages an individual’s race, color, national or ethnic origin, sex, disability, age, religion, genetic information, veteran or military status, or any other basis prohibited from discrimination under local, state, or federal law;
5. Advocates illegal activity;
6. Infringes copyrights, trademarks, or other intellectual property rights;
7. Contains spam, junk mail, or unauthorized solicitations; or
8. Violates any applicable local, state, federal law or regulation or college policy or procedure.

F. Multi-Media Usage on Official College Social Media Sites

All multimedia usage on an official college social media site must adhere to copyright, trademark, intellectual property, and privacy laws and regulations, as well as applicable college policies addressing these matters.

Note: Whether a College Work Product has been developed by a member of the college community as a result of the performance of assigned college duties or with the significant use of college facilities, resources, and/or personnel or to promote and/or market the college, including accounts featuring or displaying the college’s name and trademarks (collectively “College Work Product”), belong solely to the college. The college owns and has the right to control all College Work Product whether the member of the college community opens the account or uses, manages, or access it. The college does not require or request members of the college community to provide personal social media account information or passwords in accordance with applicable laws.
1. **Digital Images**: Usage of digital images (i.e., photographs, video or digital records) taken on campus or at college-sponsored events on an official college social media site must comply with the college’s Photography, Digital Recording, and Filming Policy.

2. **Music**:
   a. Usage of music protected by copyright is strictly prohibited unless written permission from copyright owner is received.
   b. Written permission for usage of copyright music must specifically include online distribution allowances. Additionally, broadcast and royalty requirements must be satisfied.
   c. Consumer ownership of music does not constitute a right to distribute, or usage on behalf of the college.
   d. Royalty-free music is recommended for usage online.
   e. **Video**:
      i. Events streamed on the Canisius College official YouTube, Facebook, or any other social media account require the explicit authorization of the college president;
      ii. Video taken at private events used to advertise products or services of the college may not require releases when the focus of the photograph is a location or event, not a person (i.e., the social media post is used for news or documentary uses).
      i. News is a factual account about an individual, initiative, event, body or work, etc. that would be “new” to the reader (“news”) for the purpose of relaying information for advancement of knowledge.
      ii. Documentary use is the factual “documenting” of a person, initiative, program or event, purely for the purpose of relaying information or advancing knowledge.

3. When an individual’s face in a video taken at a private event is identifiable and “featured” for purposes of college programs or administrative programs; promotes events in advance; fundraising; recruiting; or encouraging attendance or participation, the best practice is to obtain a signed release.
   i. Promotional or marketing uses are generally considered those that use Social Media to seek to motivate action — attendance, donation, participation, enrollment, etc.
   ii. Private events or invitation only-events when a registration or RSVP is required should include the following opt-out language on the registration or RSVP form if video will be taken for purposes of marketing or promotion: “The college will be taking photos/video at this event for use in advertising and other promotional materials, whether in print, electronic, or social media. Please check this box ____ if you do not authorize that you [or your child] be photographed at this event [or camp].”

4. Public events do not require a signed released by subjects. Furthermore, events that occur outdoors or in public space on or off campus are typically considered to be public events.
   i. Examples: a group of students at a college football game; a group of alumni at a homecoming event; students walking on campus, etc.

5. Written permission should be obtained from speakers, guest lecturers, performers, and other campus visitors who are present at college-sponsored events, unless otherwise guaranteed in performance contracts.
6. For use of images and music in videos, please review image and music guidelines above, as well the college’s streaming web video guidelines.
7. Written permission for usage of copyright video must specifically include online distribution allowances. Additionally, broadcast and royalty requirements must be satisfied.
8. Consumer ownership of video does not constitute a right to distribute, or usage on behalf of the college.
9. College video footage may be published with permission from the Office of College Communications.

Refer to the college’s streaming web video guidelines on the college wiki for additional information.

**G. Additional Guidelines for Use of Official College Social Media Sites and Postings of Official College Communications**

Members of the college community who post to an official college social media site or post an official college communication must be mindful that they are personally responsible for what they post and are expected to observe the following guidelines:

1. Post accurate, concise, and useful information;
2. Uphold the college’s mission and Jesuit values;
3. Be clear about their role and/or position with the college;
4. Read, obey, and comply with the Terms of Service for all social media tools before posting anything;
5. Be respectful of fans, followers, and those posting on the site. Use discretion regarding use of public forums versus direct messages;
6. Protect confidential and proprietary information:
   a. Posting or sharing confidential or proprietary information about the college, its students, employees, alumni or affiliates is strictly prohibited;
   b. All members of the college community must follow applicable federal requirements, including but not limited to Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Family Educational Rights and Privacy Act of 1974 (FERPA);
   c. Do not consider any information posted to social media sites and blogs as private, even if the strongest privacy settings are used;
   d. Adhere to all applicable college policies and procedures;
   e. Adhere to trademark, logo, and licensing guidelines as published in college’s Brand Guide;
   f. The College Communications or Athletics Communications Office, as applicable will provide members of the media and the public with college and departmental news:
      i. Members of the college community should not speak or post information to the media without contacting the College Communications or Athletics Communications Office, as applicable;
      ii. All media inquiries should be directed College Communications or Athletics Communications Office, as applicable;
      iii. Respect copyright and intellectual property rights of other entities, artists, and organizations in accordance with federal laws and regulations;
      iv. Know the facts before posting;
      v. Cite sources whenever possible. Give credit where credit is due;
      vi. If an error is made, correct it quickly;
      vii. Respect the ideas of others;
      viii. Do not represent personal opinions as being endorsed by the college or any of its organizations.
H. Right to Terminate Official College Social Media Sites

In the event that this policy is violated, or an official college social media site appears to be stagnant (no posts or activity for more than six months), an account administrator or the Office of College Communications or Athletics Communications Office, as applicable reserves the right to terminate the account.

II. Personal Use of Social Media

A. College Employees

The college respects the rights of its employees to use social media as a medium of self-expression. However, the college requires that the following guidelines be observed:

Employees are personally responsible for what they post on social media sites. For non-business participation on social media sites, employees must use a personal e-mail address. Use of personal e-mail accounts serves to prevent confusion and works to eliminate any misperception of speaking on behalf of the college.

The personal use of social media sites during business hours to access social media must be limited to incidental use. Incidental use should not interfere with the employee’s performance of assigned job responsibilities or someone else’s job performance or compromise the functionality of the campus network.

In using social media as part of the employee’s personal life, employees should refrain from presenting personal opinions in ways that imply endorsement by the college. If posted material may reasonably be construed as implying the support, endorsement, or opposition of the college with regard to any personal statements, including opinions or views on any issue, the employee should make clear that he or she is speaking for oneself and not as a representative of the college.

In addition, an employee’s personal use of social media or electronic postings should be consistent with college policies. Examples of postings that are contrary to college policy include, but are not limited to the following:

1. Unlawfully discriminatory or harassing behavior, including but not limited to sexual or gender-based misconduct, against a member of the college community;
2. Posting of materials or information in violation of the college’s confidentiality or student record policies or provisions protecting trade secrets contained in any college confidentiality agreement, contract, and/or grant;
3. Postings that unlawfully or maliciously defame or disparage the college, its employees, students, or work product or make grossly reckless or maliciously false statements about the college;
4. Non-approved use of the college’s name or the posting of the college’s seal, logo, trade and service marks, monograms, or images;
5. Any violation of the Standards of Ethical Conduct;
6. Only individuals authorized by the Athletic Department may recruit potential student-athletes via social media. All governing athletic regulations must be followed when using official and/or personal social media accounts in the recruitment of student athletes.

In response to concerns or complaints or information provided by individuals, college administrators may look up profiles on social networking sites and may use the information in informal or formal disciplinary proceedings.

B. Students

Canisius College students must be concerned with any behavior that might reflect badly on themselves, their families, and the college. Such behavior includes any activities conducted online.

Students users must understand that any content they make public via online social networks or digital platforms (i.e., cell phones, mobile devices, laptops, tablets, etc.) is expected to follow acceptable social behaviors and also to comply with federal and state government laws and college policies, procedures, rules, and regulations, including the Community Standards. Because social networking sites are part of the public domain, students should make use of any available privacy settings, and as a general rule should avoid posting sensitive personal information such as a home address, phone number or birth date. Students should also be aware that inappropriate conduct online could negatively impact their personal, academic and professional lives if viewed by college personnel, employers or potential employers, internship supervisors, scholarship committees or admissions committees. If inappropriate conduct is deemed a violation of any law or regulation, disciplinary and/or law enforcement action may be taken. Examples of misconduct include, but are not limited to, derogatory language about any member of the college community; demeaning statements about or threats to any third party; and incriminating photos or statements depicting hazing, unlawfully discriminatory or harassing behavior, sexual or gender-based misconduct, vandalism, stalking, underage drinking, and illegal drug use.

C. Student Athletes

Participation in intercollegiate athletics at Canisius College is a privilege, not a right. While the Athletic Department does not prohibit student-athlete use of online social network sites and/or digital platforms, it must be understood that the high standard of integrity expected of student-athletes on the field also extends to areas off the field, such as comments and postings made to Internet sites. The Athletic Department reserves the right to take action against currently enrolled student-athletes engaged in online behavior that violates National Collegiate Athletic Association (NCAA), Athletic Conference, or College, Athletic Department, or team policies, rules, and regulations. This action may include education, counseling, team suspension, termination from the team, reduction or non-renewal of any athletic scholarships, disciplinary sanctions or involvement of law enforcement agencies.

RELATED POLICIES

Acceptable Use of College Computer and Network Systems Policy
Brand Guide
College Web Presence Policy
Intellectual Property Rights and Ownership Policy
Password Policy
2.6.7 Use of the College Name, Seal, and Logos Policy

**USE OF THE COLLEGE NAME, SEAL, AND LOGOS POLICY**

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<td>II -2.6.7</td>
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<td>Applicability:</td>
<td>All members of the Canisius College community.</td>
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<td>History:</td>
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**PURPOSE**
The purpose of this policy is to protect and control the use of the college’s name, seal, and logos, and to protect the integrity of the college’s identity.

**POLICY**
The Canisius College name, seal, and logos, including the intercollegiate athletics logo, are trademarks of the college and are controlled and protected by the college. All use of the College name, seal or logos of Canisius College must be authorized by the Office College Communications in accordance with the policy guidelines and procedures set forth in this policy and adhere to the branding and visual identity guidelines presented in the most recent version of Canisius Brand Guide.

**DEFINITIONS**
Not Applicable.

**PROCEDURES/GUIDELINES**

**Canisius College Logo & Seal**
The Canisius logo and seal represent the college at the very highest level and is vitally important to the college’s brand. They act as a signature, an identifier, and a stamp of quality. It is, and should always be, the most consistent component in college communications. In order to maintain this consistency, a few simple guidelines should be followed. The Canisius logo or seal should never be recreated or typeset. Only official logo or seal files should be used in college communications. Official logo and seal files can be downloaded here. The Canisius logo, as shown in the Canisius Brand Guide serves as the campus’ primary logo and trademark. To protect the value of the Canisius identity, it is important to use the logos as presented in in the Canisius Brand Guide without modification.

Other campus trademarks may appear on merchandise produced by vendors specifically licensed to reproduce these trademarks. With the exception of athletic trademarks, all products bearing Canisius College trademarks must follow guidelines established in the Brand Guide and be ordered from a college-approved manufacturer. The Office of College Communications must be consulted when ordering promotional items. Use of athletic trademarks must be approved by the Athletic Department.

For more information on the logo or for questions regarding logo usage, see below or contact the Office of Creative Services, at ext. 2781.

**Commercial Uses**
Canisius College’s name, seal, and logos are the exclusive property of the college and, consequently, may not be used in connection with goods or services offered by any outside organization without the prior permission of the Office of College Communications. Similarly, the college’s trademarks cannot be used to endorse any product or service, either explicitly, or implicitly, without the permission of the Office of College Communications.

**Use by Members of the Campus Community**
Members of the campus community, either individually or collectively, may not officially use the name, seal, or logos of Canisius College in any activity outside the regular work of the college. Violation of this policy is subject to appropriate disciplinary action.

Members of the campus community publish a considerable number of reports in the form of bulletins, circulars, scientific articles, monographs, and books, some of which are copyrighted and others of which are not. Members of the campus community wishing to use the College’s logos on books, journal articles, and conference presentations must obtain permission from the Office of College Communications. Requests for use of trademarks associated with intellectual property owned by the college, such as academic research, must also be addressed to the Office of the Vice President for Academic Affairs.
The official college logo must be used on communications issued in the college’s name. This includes all brochures, postcards, booklets, and similar items issued by individual offices or departments. The college relies on the logo as the single graphic element which, when used universally, establishes a consistent visual identity for the entire institution. Use of the logo also ensures that the correct, complete name of the college appears on all official Canisius College communications (e.g., stationery items, brochures, websites). To protect the value of the Canisius identity, it is important to use the logos and seal as presented in Canisius Brand Guide without modification.

Consistent with the Jesuit philosophy of education and the mission of the college, the Canisius College intercollegiate athletics program strives for excellence in academics, athletics, leadership, and service to others while embracing the principles of good sportsmanship, ethical conduct, and equity in opportunity. Canisius College athletic logos may only be used for official athletics communications. For help determining where to use them, contact the Assistant Athletic Director at 716-888-8265 or GoGriffs.com.

Use of the Canisius College seal is restricted to official college documents and certificates of merit used by the college. For help determining where to use the Canisius seal, contact the Office College Communications, at ext. 2781.

Use of College Stationery

General stationery (i.e., letterheads, envelopes, and business cards) has been developed for use by all departments. One- or two-sided options are available depending on the department’s budget. Official letterhead must include the approved, complete department title. This stationery may be ordered through the Dupli storefront. In addition, formal stationery consisting of letterheads, envelopes and business cards have been developed for formal communications, featuring the official Canisius seal and the Office of the President insignia. This stationery is reserved for use on the College’s most official communications, including the Office of the President. Individual academic departments may not use this stationery. Refer to the Brand Guide for additional information.

Notification

Individuals are requested to report violations of this policy to the Office of College Communications.

Enforcement

The Office of College Communications is responsible for the appropriate enforcement of this policy.

Sanctions

Students and employees who violate the provisions of this policy are subject to disciplinary action pursuant to the college’s applicable disciplinary policies. In addition, individuals and entities that use the college's trademarks without permission are subject to civil and criminal penalties pursuant to trademark law.

RELATED POLICIES

Use of the College Name, Seal, and Logos Policy

2.6.8 Website Privacy Policy

<table>
<thead>
<tr>
<th>WEBSITE PRIVACY POLICY</th>
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</tr>
<tr>
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<td>Applicability:</td>
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PURPOSE

The purpose of this policy is to ensure that all official college websites include a link to the college’s Privacy Policy statement about the information that is collected by the page (both automatically and voluntarily), how that information is used by the college, and how the college complies with multiple regulations, including the European Union General Data Protection Regulation (“EU GDPR”).

POLICY

It is the policy of Canisius College that all college websites comply with regulations addressing privacy practices and inform online users of how information at that site is managed through the posting of a Privacy Policy statement. Accordingly, members of the college community responsible for maintaining a college website must ensure that each page of the website display a link to the college’s Privacy Policy (see https://www.canisius.edu/canisius-college-privacy-policy).
Note: The Institutional Review Board (IRB) is responsible for reviewing sites conducting web-based research. The IRB develops its own guidelines for the use of websites in research and applies those guidelines to research projects requiring IRB review.

DEFINITIONS

Member of the College Community—includes any person who is a student, faculty member, staff member, organization, club, group, team, alumni, volunteer, trustee, or any other person employed by the college. This definition also includes all college departments, offices and programs.

College Website—any website operated on (a) the college network, (b) by a college department, organization or program, or (c) using college resources, whether or not it is accessed through a www.canisius.edu address.

See also the Definitions and Legal References section of the Privacy Policy statement below.

CANISIUS COLLEGE PRIVACY POLICY

Thank you for visiting our site. This statement discloses the privacy practices for the Canisius College website and any related offline print and electronic publications. By using our site or one of our offline print or electronic publications, you agree to the collection, use and disclosure of your personal data as described in this statement. If you do not agree to the terms of this statement, then please do not use the site or such publications. BY USING THIS SITE, YOU AGREE TO OUR COLLECTION, USE AND MAINTENANCE OF YOUR DATA OR PERSONAL DATA IN THE UNITED STATES. If you are visiting the site from a location outside of the United States, your connection will be through and to servers located in the United States. All personal data you provide will be processed and securely maintained in our web servers and internal systems located within the United States.

If you have any questions regarding this Privacy Policy, please send us an e-mail (info@canisius.edu). Contact us by mail at 2001 Main Street, Buffalo NY 14208-1517.

Please read this Privacy Policy carefully.

Definitions and interpretation

In this Privacy Policy, the following definitions are used:

Data or Personal Data

collectively all information that you submit to Canisius College via the Website that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person. This definition incorporates, where applicable, the definitions provided in the Data Protection Act 1998;

Data Subject

The natural person to whom the Personal Data refers;

Cookies

a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies);

UK and EU Cookie Law

the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;

User or you

any third party that accesses the website (i.e., www.canisius.edu) who, unless otherwise specified, coincides with the Data Subject and is not either (i) employed by Canisius College and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Canisius College and accessing the Website in connection with the provision of such services;

and

Usage Data

Information collected automatically through www.canisius.edu (or third-party services employed in www.canisius.edu), which can include: the IP addresses or domain names of the computers utilized by the Users who use ucumberlands.edu, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server’s answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User’s IT environment.

Website

the website that you are currently using, canisius.edu, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

Data Processor (or Data Supervisor)
The college takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of your data.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the college, as described in this privacy policy.

Service

The service provided by www.canisius.edu as described in the relative terms (if available) and on this site/application.

European Union (OR EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookies

Small piece of data stored in the User's device.

Privacy Policy

Collection of Data

Among the types of Personal Data that ucumberlands.edu collects, by itself or through third parties, there are: cookies, usage data, first name, last name, gender, date of birth, phone number, company name, profession, address, fax number, country, state, province, email address, ZIP/Postal code, city, field of activity and user ID. Complete details on each type of personal data collected are provided below, in other dedicated sections of this policy, or by specific explanation texts displayed prior to the data collection. Personal data may be freely provided by the user, or, in case of usage data, collected automatically when using www.canisius.edu.

Unless specified otherwise, all data requested by www.canisius.edu is mandatory and failure to provide this data may make it impossible for www.canisius.edu to provide its services. In cases where www.canisius.edu specifically states that some data is not mandatory, users are free not to communicate this data without consequences to the availability or the functioning of the service. Users who are uncertain about which personal data is mandatory are welcome to contact the college or applicable owner.

Credit & Debit Card Data

We do not store credit card details nor do we share customer details with any 3rd parties;

Specific Examples of Data Collected:

Our online and offline registration forms require users to give us contact information including name, e-mail address and postal address. We may also collect your telephone number, and other data. We use this contact information to send you information about the specific solutions or services that match your interests.

We may also collect contact and other data from you if you: (1) participate in one of our contests or sweepstakes or apply for an offering from us; (2) order from us; (3) take part in one of our surveys; (4) contact us; or (5) otherwise voluntarily submit information to us, including in our online communities. You always have the ability to opt out of receiving future mailings and special offers; see the “Opt Out” section below.

If you use any of our tell-a-friend features, we ask for your friend’s name and e-mail address. We use this information only to send the communication you requested and to monitor the effectiveness of our tell-a-friend features. You are responsible for any third-party personal data obtained, published or shared through www.canisius.edu and confirm that you have the third party's consent to provide the data to the college.

As part of the standard operation of the site, we may collect certain non-personal data from you, including but not limited to your browser type, operating system, IP address and the domain name from which you accessed the site. In addition, we may collect data about your browsing behavior, such as the date and time you visit the site, the areas or pages of the site that you visit, the amount of time you spend viewing the site, the number of times you return to the site and other click-stream data. We do not combine this non-personal data with your personal data. We use this data to: (1) provide you with customized content and advertising; (2) administer the site, monitor its usage and diagnose problems with it; (3) remember you when you return to the site, so that you don’t have to re-submit information and preferences; and (4) conduct research to improve our content and services. In addition, we use software that uses your IP address to determine roughly where you are located, so that we can deliver advertisements to you, while you are on the site, based on your location and therefore as relevant to you as possible. We use web beacons, which are tiny graphic images, in our e-mails. These help us measure the effectiveness of our e-mail campaigns, by telling us whether the messages have been received, opened or otherwise acted upon. We also work with a company that serves advertisements on our behalf. The company uses cookies, web beacons or similar technologies to collect anonymous information about your visits to the site and other websites, so that we may serve you advertisements that are relevant to your interests. Our ad serving company does not collect personal data about you, and we do not share any personal data with it. We will never share your IP address with a third party (except for our service providers) without first securing your express permission to do so.

Any use of cookies – or of other tracking tools – by www.canisius.edu or by the owners of third-party services used by the college serves the purpose of providing a service required by the user, in addition to any other purposes described in the cookie policy (see below).

All personal data is stored securely in accordance with the principles of the Data Protection Act 1998 and EU GDPR. For more details on security see the clause below (Security).

Methods of Processing Personal Data

The college takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of your data.
Data processing is carried out using computers and/or information technology enabled tools, following college procedures and modes strictly related to the purposes indicated. In addition to the college, in some cases, your data may be accessible to certain types of persons in charge, involved with the operation of [www.canisius.edu](http://www.canisius.edu) (administrators, admissions, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, information technology companies, communications agencies) appointed, if necessary, as data processors by the college. You may request an updated list of these parties from the college at any time.

**Legal Basis of Processing Personal Data**

The college may process your data if one of the following applies:

1. You have given consent for one or more specific purposes. Note: Under some legislations the college may be allowed to process your data until you object to such processing ("opt-out"), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;  
2. Provision of your data is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof;  
3. Processing is necessary for compliance with a legal obligation to which the college is subject;  
4. Processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the college;  
5. Processing is necessary for the purposes of the legitimate interests pursued by college or by a third party.

There will be some instances where the collection and processing of your personal data will be pursuant to other lawful bases. In any case, the college will help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of your data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

We do not collect your personal data through our website and other platforms, unless it is voluntarily provided by you. In such instances, we will never sell or trade the personal data you provide to us, unless we have your consent in doing so, or if the data is needed for legal processes.

Note: As GDPR is a new law, the conditions identified above may be subject to change as more guidance is given or precedents are set.

**Place of Processing**

Your data is processed at the college’s operating offices and in any other places where the parties involved in the processing are located.

Depending on your location, data transfers may involve transferring your data to a country other than your own.

You are also entitled to learn about the legal basis of data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the college to safeguard its data.

If any such transfer takes place, you may find out more by checking the relevant sections of this policy or inquire with the college using the information provided in the contact section.

**Retention Time**

The college keeps the personal data it collects in accordance with the retention periods of applicable federal law and the college’s Record Retention Schedule. Your data will be destroyed upon your request unless applicable law requires destruction after the expiration of an applicable retention period. The manner of destruction shall be appropriate to preserve and ensure the confidentiality of your data given the level of sensitivity, value and criticality to the college.

**Cookies**

1. This Website may place and access certain Cookies on your computer. Canisius College uses Cookies to improve your experience of using the Website and to improve our range of products and services. Canisius College has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.  
2. All Cookies used by this Website are used in accordance with current US, UK, and EU Cookie Law.  
3. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Canisius College to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.  
4. This website may place the following Cookies:  
   a. Strictly necessary cookies: These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.  
   b. Performance Cookies: These cookies are used to collect information about how you interact with our website.  
5. Disabling and Deleting Cookies  
   a. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser.  
   b. You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalization settings.  
   c. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

**Information Use**

For purposes of the Data Protection Act 1998, Canisius College is the “data controller”. We will retain any data you submit for 12 months.

We may use the data we collect from and about you for any of the following purposes:

1. To fulfill your requests for products and services;  
2. To provide you with targeted offers, site content and advertising on the site;  
3. To contact you with information and promotional materials and offers from the college, as well as from our affiliates, other related companies, educational institutions, marketing partners and other third parties, if you have agreed to receive such communications;  
4. To contact you when necessary;  
5. To review site and product usage and operations;  
6. To address problems with the site, our business or our products and services; and
We may disclose your personal data as follows:

1. **Consent:** We may disclose your personal data if we have your consent to do so.
2. **Emergency Circumstances:** We may share your personal data when necessary to protect your interests and you are physically or legally incapable of providing consent.
3. **Employment Necessity:** We may share your personal data when necessary for administering employment or social security benefits in accordance with applicable law, subject to the imposition of appropriate safeguards to prevent further unauthorized disclosure.
4. **Charitable Organizations:** We may share your personal data with applicable college foundations and other not-for-profit organizations in connection with charitable giving subject to the imposition of appropriate safeguards to prevent further unauthorized disclosure.
5. **Public Information:** We may share your personal data if you have manifestly made it public.
6. **Archiving:** We may share your personal data for archiving purposes in the public interest, and for historical research, and statistical purposes.
7. **Performance of a Contract:** We may share your personal data when necessary to administer a contract you have with the college.
8. **Legal Obligation:** We may share your personal data when the disclosure is required or permitted by international, federal, and state laws and regulations.
9. **Service Providers:** We use third parties who have entered into a contract with the college to support the administration of college operations and policies. In such cases, we share your personal data with such third parties subject to the imposition of appropriate safeguards to prevent further unauthorized disclosure.
10. **College Affiliated Programs:** We may share your personal data with parties that are affiliated with the college for the purpose of contacting you about goods, services, charitable giving, or experiences that may be of interest to you.
11. **De-Identified and Aggregate Information:** We may use and disclose your personal data in de-identified or aggregate form without limitation.

If your personal data is transferred to third party service providers, we will take steps to ensure that your personal data receives the same level of protection as if it remained within the EU, including by entering into data transfer agreements or by relying on certification schemes. You have a right to obtain details of the mechanism under which your personal data is transferred outside of the EU by contacting info@canisius.edu. Moreover, we contractually require agents, service providers, and affiliates who may process your personal data to provide the same level of protection as if it remained within the EU, including by entering into data transfer agreements or by relying on certification schemes. You have a right to regulate information created in the European Union that is transferred out of the European Union to the college.

**Your Rights**

Pursuant to the GDPR, you have the following rights:

1. To be notified if we intend to transfer your personal data to another country or international organization and the identity of the recipients of your personal data;
2. To be notified of the period your personal data will be stored;
3. To access and require us to correct the personal data we hold about you if it is incorrect;
4. To require us to erase your personal data subject to the retention periods of applicable federal law and the college’s Record Retention Schedule;
5. To require us to restrict our data processing activities and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal;
6. To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
7. To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights;
8. To be notified of the existence of any automated decision-making regarding the use of your personal data, including meaningful information about the logic involved and its significance and consequences of such processing;
9. To be notified if the collected personal data will be further processed for a purpose other than that for which it was collected;
10. To file a complaint with the appropriate supervisory authority in the European Union if you feel we have not complied with applicable foreign laws regulating information created in the European Union that is transferred out of the European Union to the college.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

**Opt Out**

Users who have opted in through our online and offline registration forms can opt out of receiving future communications from us. Users may also request removal directly from our partners at any time in the future. We make every effort to honor their request; however, we expressly disclaim responsibility for the actions of partners or other third parties beyond our control. To remove information from our database, users can send us an e-mail (info@canisius.edu) or contact us by mail at 2001 Main Street, Buffalo NY 14208-1517. You may also use the opt-out mechanism that is contained in each email.

**Access**

You have the right to ask for a copy of any of your personal data held by Canisius College.

To access, correct or request that we make no further use of your personal data, please send us an e-mail info@canisius.edu or contact us by mail at 2001 Main Street, Buffalo NY 14208-1517.

**Controlling use of your Personal Data**

Wherever you are required to submit personal data, you will be given options to restrict our use of that data. This may include the following:

1. Use of personal data for direct marketing purposes; and
2. Sharing personal data with third parties.

**Functionality of the Website**

1. To use all features and functions available on the website, you may be required to submit certain Data.
2. You may restrict your internet browser’s use of Cookies. For more information see the Cookies clause.
Third party websites and services
Canisius College may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. The providers of such services have access to certain personal data provided by Users of this Website.

Any data used by such parties is used only to the extent required by them to perform the services that we request. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties will be processed within the terms of this privacy policy and in accordance with the Data Protection Act 1998 and GPDR.

Links to other websites
This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of Business Ownership and Control
Canisius College may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Canisius College. Data provided by you will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the data for the purposes for which it was originally supplied to us.

We may also disclose data to a prospective purchaser of our business or any part of it.

In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Security
Canisius College has taken certain physical, electronic, contractual and managerial steps to safeguard and secure your personal data. It is your responsibility to maintain the confidentiality of your site account information, including your password, and you are responsible for all use of the site accessed through it. You agree to notify us immediately of any unauthorized use of your account or any other actual or suspected breach of site security. You may report suspected violations to the Webmaster at the address listed below.

Children
We do not direct the site to, nor do we knowingly collect any personal information from, children under thirteen.

General
1. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
2. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
3. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
4. This privacy policy is governed by and interpreted according to the laws of the United States of America. All disputes arising under this privacy policy are subject to the jurisdiction of the courts of the United States of America.

Changes to this Privacy Policy Statement
Please note that we review our privacy policy from time to time, and that our practices are subject to change. We ask that you bookmark and periodically review this page to ensure continuing familiarity with the most current version of our privacy policy. All amended terms shall be automatically effective after they are posted on the site and applied retroactively if you use the site after this policy is amended.

Your Acceptance of These Terms
By using this website, you signify your acceptance of this privacy policy. If you do not agree to this statement, please do not use our website. Your continued use of the website following the posting of changes to this statement will be deemed your acceptance of those changes.

Contact Us
If you have any questions about this privacy policy statement, the practices of the website, or dealings with the website or with us, contact:

Canisius College
2001 Main Street, Buffalo NY 14208-1517

Phone: (716) 883-7000

info@canisius.edu

RELATED POLICIES
Not Applicable.