

# CONCORDIA UNIVERSITY CHICAGO

## PRIVACY POLICY

5/3/2023

### INTRODUCTION

Concordia University Chicago (“CUC,” “we,” “our,” or “us”) respects the privacy of your information. This Privacy Policy is designed to assist you in understanding how we collect, use, share, and safeguard your information. This Privacy Policy applies to individuals who access this website (the “Site”), and the services provided through this Site (the “Services”).

Please review our [FERPA Policy](#) for more information on our practices under the Family Educational Rights and Privacy Act (FERPA).

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage. If we make material changes to our Privacy Policy, we may also notify you by other means, such as sending an email or posting a notice on our home page. If required by applicable data protection laws, we will obtain your consent to any material changes. Please review this Privacy Policy periodically.

This Privacy Policy covers the following topics:

1. **WHAT IS CUC?**
2. **COLLECTING AND USING INFORMATION**
3. **COOKIES AND OTHER TRACKING TECHNOLOGIES**
4. **THIRD PARTY PROCESSORS**
5. **INTERNATIONAL DATA TRANSFERS**
6. **“DO NOT TRACK” SIGNALS**
7. **ADVERTISING AND MARKETING CHOICES**
8. **THIRD PARTY LINKS**
9. **SECURITY**
10. **CHILDREN’S PRIVACY**
11. **YOUR PERSONAL DATA AND YOUR RIGHTS –UNITED STATES ONLY**
12. **YOUR PERSONAL DATA AND YOUR RIGHTS –EUROPE AND THE UNITED KINGDOM ONLY**
13. **YOUR CHOICES AND RIGHTS – REST OF THE WORLD**
14. **HOW TO CONTACT US**

### 1. WHAT IS CUC?

CUC is a Lutheran university where the Gospel lives and forms our students, a place where students engage important questions and a place where students discover their vocations. Our goal is to help students discover their God-given talents and gifts and help them determine how best to carry these talents out into the world to serve others.

CUC's offices are located at 7400 Augusta St. River Forest, IL 60305. CUC is the data controller of all personal data collected from residents of the European Economic Area or the United Kingdom.

## 2. COLLECTING AND USING INFORMATION

### Personal Data We Collect

Through your use of the Site and Services, we will collect personal data from you. For purposes of this Privacy Policy, "Personal Data" refers to any information relating to an identified or identifiable natural person that we maintain in an accessible form.

#### *Information You Provide*

When you use the Site or Services, you may voluntarily provide us with the following types of Personal Data:

- *Submit an Application.* To submit an application with our school, you will provide us with your name, phone number, email address, physical address, gender, date of birth, citizenship status, military status, ethnicity, employment information, education information, visa status, and any other information you may choose to provide in your application.
- *Schedule a Visit.* To schedule a visit with us, you will provide us with your name, phone number, email address, physical address, and any other information you choose to provide.
- *Create an Account.* To create an account with us, you will provide us with your name, email address, physical address, phone number, and you will create a password for future logins.
- *Request Information.* Depending on the type of program you request information on, you may provide us with your name, physical address, phone number, email address, gender, date of birth, religion, education information, and ethnicity.
- *Register for an Event or Make a Donation.* To register for an event or to make a donation, you will provide your name, physical address, phone number, and credit card information. We use 4aGoodCause to process payments. Please review 4aGoodCause's privacy policy [here](#).
- *Apply for a Job.* To apply for a job, you will provide us with your name, email address, phone number, and any other information you choose to provide in a resume or cover letter. We use ApplicantPro to process job applications. Please review ApplicantPro's privacy policy [here](#).
- *Schedule Counseling Appointment.* To schedule a counseling appointment, you will provide us with your name, date of birth, email address, phone number, and physical address.

- *Submit a Story.* To submit a story, you will provide us with your name and any other information you choose to provide.
- *Camp Purchase.* To make a camp purchase, you will provide us with your name, email address, physical address, credit card information, and your child's information, including age.

#### *Information as You Navigate Our Site and Services*

We automatically collect certain Personal Data through your use of the Site and Services, including the Application. We will automatically collect certain Personal Data, such as the following:

- *Usage Information.* For example, the pages on the Site you access, the frequency of access, and what you click on while on the Site.
- *Device Information.* For example, hardware model, operating system, application version number, and browser.
- *Mobile Device Information.* Aggregated information about whether the Site is accessed via a mobile device or tablet, the device type, and the carrier.
- *Location Information.* Location information from Site visitors on a city-regional basis.

#### *Third Party Information*

In some cases, we may receive certain Personal Data from you about a third party. For example, when you schedule a visit, you may provide the name, email address, physical address, and phone number of a third party. If you submit any Personal Data about another individual to us, you are responsible for making sure that you have the authority to do so and to allow us to use their Personal Data in accordance with this Privacy Policy.

### **How We Use Your Personal Data**

We use the Personal Data we collect to provide the Services to you, to improve our Services and Site, and to protect our legal rights. In addition, we may use the Personal Data we collect to:

- Process your application;
- Schedule your visit;
- Process your account registration;
- Enroll you in courses;
- Register you for an event or camp;
- Provide you with program information;

- Process your job application;
- Accept your donation;
- Schedule your counseling appointment;
- Contact you regarding our products and services that we feel may be of interest to you;
- Communicate with you about our Site or Services or to inform you of any changes to our Site or Services;
- Provide support;
- Maintain and improve our Site and Services;
- Investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of CUC policy;
- Defend our legal rights and the rights of others;
- Efficiently maintain our business; and
- Comply with applicable law.

### **How We Share Your Personal Data**

We may share the information that we collect about you in the following ways:

- With service providers who perform data services on our behalf (e.g., email, hosting, maintenance, backup, analysis, enrollment verification, etc.);
- To service providers to prepare, deploy and analyze advertising content;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personal Data where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personal Data;
- To any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition or in preparation for any of these events; and

- To any other person or entity where you consent to the disclosure.

### **3. COOKIES AND OTHER TRACKING TECHNOLOGIES**

Like many other companies, we use cookies and other tracking technologies (such as pixels and web beacons). To learn more about how we use cookies and to change your cookie settings, please see our Cookie Policy.

### **4. THIRD PARTY PROCESSORS**

To ensure that your Personal Data receives an adequate level of protection, we have put in place appropriate procedures with the service providers we share your Personal Data with to ensure that your Personal Data is treated by those service providers in a way that is consistent with and which respects the applicable laws on data security and privacy. For example, we use cloud data storage, marketing, fundraising solution, payment processors, payroll processors, and education technology providers.

### **5. INTERNATIONAL DATA TRANSFERS**

We operate internationally and transfer information to the United States for the purposes described in this policy. The United States may have privacy and data protection laws that differ from, and are potentially less protective than, the laws of your country. Your Personal Data can be subject to access requests from governments, courts, or law enforcement in the United States according to the laws of the United States.

For any transfers of Personal Data from the European Economic Area (EEA), Switzerland, or the United Kingdom that we make to other entities as described in this Privacy Policy, we use appropriate safeguards to ensure for the lawful processing and transfer of the Personal Data, including, when appropriate, the use of [standard contractual clauses](#) approved by the European Commission. To obtain a copy of the safeguards, contact us at [privacy@cuchicago.edu](mailto:privacy@cuchicago.edu).

### **6. “DO NOT TRACK” SIGNALS**

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the “Do Not Track” signal, the Site does not currently interpret, respond to or alter its practices when it receives “Do Not Track” signals.

### **7. ADVERTISING AND MARKETING CHOICES**

Depending on your location (and reflecting applicable law), you may have been asked to indicate your preferences, provide us with your consent regarding the receipt of such information from us, and indicate how you would like to receive it.

Wherever you are located, we will send you marketing communications based on any preferences you may have expressed.

We only want to send you information in which you are interested. If you do not want to receive these communications or would like to understand more about other unsubscribe options, please contact us as set out in the “**HOW TO CONTACT US**” section below.

For email communications, you can opt out and/or manage your preferences by clicking on the unsubscribe link provided at the bottom of any email you receive from us. You also may submit a request to us at [privacy@cuchicago.edu](mailto:privacy@cuchicago.edu). If we call you with information you do not want to receive, you can advise us of this during the telephone call.

## **8. THIRD PARTY LINKS**

The Site and Services may contain links that will let you leave the Site and Services and access another website. Linked websites are not under our control. Except as stated below, this Privacy Policy applies solely to Personal Data that is acquired on this Site and Services. We accept no responsibility or liability for these other websites.

## **9. SECURITY**

We maintain commercially reasonable security measures to protect the Personal Data we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee absolute security.

## **10. CHILDREN’S PRIVACY**

We may collect Personal Data from children under the age of 16 and we recognize the need to provide additional protection with respect to any Personal Data we collect from children. We will collect consent from parents and legal guardians as required to comply with applicable laws.

## **11. YOUR PERSONAL DATA AND YOUR RIGHTS –UNITED STATES ONLY**

### **California Shine the Light Law**

We do not disclose personal information obtained through our Site or Services to third parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.

## **12. YOUR PERSONAL DATA AND YOUR RIGHTS –EUROPE AND THE UNITED KINGDOM ONLY**

If you are in a country in the European Economic Area (EEA) or in the United Kingdom, you are entitled to the following explanation of the legal bases we rely on to process your Personal Data and a description of your privacy rights.

### **Legal Bases for Processing Your Personal Data**

The legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it.

### *Consent*

We may process your Personal Data based on your consent such as when you create an account or when you ask us to send certain kinds of marketing communications. You have the right to withdraw your consent at any time without affecting the lawfulness of the processing based on consent before its withdrawal.

### *Our Legitimate Interests*

We may process your Personal Data if doing so is necessary for our legitimate interests and your rights as an individual do not override those legitimate interests. For example, when we process your Personal Data to carry out fraud prevention activities and activities to increase network and information security, to market directly to you, to expand our business activities and to improve our services and the content and functionality of our Site.

### *To Perform a Contract*

We may process your Personal Data to administer and fulfill contractual obligations to you.

### *To Enable Us to Comply with a Legal Obligation*

We may process your Personal Data to comply with legal obligations to which we are subject. This may include any requirement to produce audited accounts and to comply with legal process.

### *Necessary for the Exercise or Defense of Legal Claims*

If you bring a claim against us or we bring a claim against you, we may process your Personal Data in relation to that claim.

If you have any questions about or need further information concerning the legal basis on which we collect and use your Personal Data for any specific processing activity, please contact us using the “**HOW TO CONTACT US**” section below.

## **Your Rights**

### *Access Your Personal Data*

You have the right to obtain from us confirmation as to whether or not we are processing Personal Data about you and, if so, the right to be provided with the information contained in this Privacy Policy. You also have the right to receive a copy of the Personal Data undergoing processing.

### *Rectify Your Personal Data*

You have the right to ask us to rectify any inaccurate Personal Data about you and to have incomplete Personal Data completed.

### *Restrict Our Use of Your Personal Data*

You have the right to ask us to place a restriction on our use of your Personal Data if one of the following applies to you:

- You contest the accuracy of the information that we hold about you, while we verify its accuracy;
- We have used your information unlawfully, but you request us to restrict its use instead of erasing it;
- We no longer need the information for the purpose for which we collected it, but you need it to deal with a legal claim; or
- You have objected to us using your information, while we check whether our legitimate grounds override your right to object.

#### *Object to Our Use of Your Personal Data*

You have the right to object to our use of your Personal Data where our reason for using it is based on our legitimate interests or your consent (rather than when the reason for using it is to perform an obligation due to you under a contract with us).

#### *Delete Your Personal Data*

You can ask us to delete your Personal Data if:

- We no longer need it for the purposes for which we collected it;
- We have been using it with no valid legal basis;
- We are obligated to erase it to comply with a legal obligation to which we are subject;
- We need your consent to use the information and you withdraw consent;
- You object to us processing your Personal Data where our legal basis for doing so is our legitimate interests and there are no overriding legitimate grounds for the processing.

However, this right is not absolute. Even if you make a request for deletion, we may need to retain certain information for legal or administrative purposes, such as record keeping, maintenance of opt-out requirements, defending or making legal claims, or detecting fraudulent activities. We will retain information in accordance with the “**How Long Is Your Personal Data Kept**” section below.

If you do exercise a valid right to have your Personal Data deleted, please keep in mind that deletion by third parties to whom the information has been provided might not be immediate and that the deleted information may persist in backup copies for a reasonable period (but will not be available to others).

#### *Transfer Your Personal Data to Another Service Provider*



You may request that we transfer some of the Personal Data you have provided to you or another service provider in electronic copy. This applies to Personal Data we are processing to service a contract with you and to Personal Data we are processing based on your consent.

To exercise any of these rights, please contact us as described in the “**HOW TO CONTACT US**” section below.

#### *Make a Complaint*

If you have any concerns or complaints regarding our processing of your Personal Data, please contact us as described in the “**HOW TO CONTACT US**” section below and we will do our best to answer any question and resolve any complaint to your satisfaction.

If, for whatever reason, you feel we do not meet the standards you expect of us, you are also entitled to make a complaint to your local supervisory authority:

[EU Data Protection Authorities \(DPAs\)](#)

[Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)

[Information Commissioner’s Office \(United Kingdom\)](#)

#### **How Long Is Your Personal Data Kept?**

We will retain your Personal Data for as long as necessary to fulfill the purposes for which we collect it and as set out in this Privacy Policy and for the purpose of satisfying any legal, accounting, or reporting requirements that apply to us.

#### **13. YOUR CHOICES AND RIGHTS – REST OF THE WORLD**

Depending on the jurisdiction in which you are located, you may have certain rights with respect to your Personal Data. For example, you may have the following rights:

- Right to access your Personal Data;
- Right to limit or object to the processing of your Personal Data;
- Right to receive a copy of your Personal Data, including in a machine-readable format;
- Right to delete your Personal Data;
- Right to update your Personal Data;
- Right to correct inaccurate, out-of-date, or irrelevant Personal Data;
- Right to anonymization, blocking or deletion of unnecessary or excessive Personal Data or Personal Data processed in noncompliance with applicable law;
- Right to receive information about public and private entities with which we have shared your Personal Data;
- Right to information about the possibility of denying consent and the consequences of such denial;
- Right to revoke consent;
- Right to data portability;

- Right to confirm that we are processing your Personal Data;
- Right to request information on the processing of your Personal Data;
- Right to not be subject to automated decision-making;
- Right to a verification procedure that provides whether we are in compliance with the applicable law; and
- Right to object to or opt out of direct marketing from us.

If you would like to exercise your legal rights, please contact us at [privacy@cuchicago.edu](mailto:privacy@cuchicago.edu). We will process your request in accordance with any applicable legal requirements.

For a description of the legal bases for which we collect your Personal Data, please see the section **“YOUR PERSONAL DATA AND YOUR RIGHTS –EUROPE AND THE UNITED KINGDOM ONLY - Legal Bases for Processing Your Personal Data”** above.

#### **14. HOW TO CONTACT US**

For questions or concerns about our privacy policies or practices, please contact us at:

Concordia University Chicago  
7400 Augusta St.  
River Forest, IL 60305  
[privacy@cuchicago.edu](mailto:privacy@cuchicago.edu)