

# **ELECTRONIC COMMERCE AND CUSTOMER PRIVACY POLICY**

Your privacy is important to us. We are committed to ensuring that your confidential information remains confidential and secure to the fullest extent possible under the law.

This policy is subject to compliance with the Federal Education Rights and Privacy Act of 1974 (FERPA), Oregon Revised Statutes, Oregon Administrative Rules and applicable administrative policies and executive orders. The Oregon Public Records Law, set out in chapter 192 of the Oregon Revised Statutes, may apply to information we collect. Under that law, information collected at this site becomes a public record *unless* an exemption in law exists. Both state and federal laws (such as FERPA) provide exemptions. The application of the Public Records Law is discussed in section B. of this policy, "Our Use and Disclosure of Information."

The Privacy Policy below applies only to the EOU Webster site, your EOU Webster account, and any information you provide on this site. Please be sure to check other sites for their privacy policies. Webster is EOU's self-service student information system. Students use Webster to register for classes, make payments to their accounts, view and accept financial aid awards. Faculty use Webster to view their course rosters and enter grades.

- A. Information We Collect
- B. Our Use and Disclosure of Information
- C. Information Security
- D. Acceptance of Privacy Policy Terms and Conditions
- E. Links to Other Web Sites
- F. Contacting Us

## **A. Information We Collect**

### **Network Information**

Information collected automatically is analyzed to help us understand how you use our web services and how we can improve our site to better meet your needs. Like most other web sites, the following information is collected automatically:

- IP Address
- Type of browser and operating system used to access our site

- Date and time the user accessed our site
- Information regarding which pages users access or visit
- If you link to our site from another web site, we collect the address of the other web site

For site security purposes and to ensure that this service remains available to all users, this site may monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. If security monitoring reveals evidence of possible abuse or criminal activity, system personnel may provide the results of such monitoring to appropriate officials. Unauthorized attempts to upload or change information on this service are strictly prohibited and may be punishable under the state law and federal statutes including the Computer Fraud and Abuse Act of 1986 and the National Information Infrastructure Protection Act of 1996.

### **Email Information**

If you send us an electronic mail message with a question or comment that contains personally identifying information, we will only use the personally identifiable information to respond to your request and analyze trends. Please do not include your social security number in your email communications to us. We may redirect your message to another government agency or person who is in a better position to answer your question.

### **Required Information**

To access Webster, you must provide your Student ID number and Personal Identification Number (PIN). Your student ID number is assigned by EOU at the time of registration. We collect personal information such as your birth date, address and phone number. This information is necessary for us to process transactions, issue a new Webster PIN if you forget or lose your PIN and to contact you should the need arise in administering your account.

### **Online Surveys and Course Evaluations**

All information gathered from online surveys and course evaluations are kept completely confidential. Only aggregated information is shared within EOU or with third parties.

### **Use of "Cookies"**

"Cookies" are small files of data that we send to your computer to allow us to recognize you as an EOU customer. We send an encoded "session cookie" to your computer if and when you log in to your Webster account by entering your Student ID and PIN. These cookies allow us to recognize you if you visit multiple pages on our site during the same session, so that you don't need to re-enter your PIN multiple times. Once you log out or close your browser, these session cookies expire and are

no longer useful.

## **B. Use and Disclosure of Information**

### **Internal Uses**

We use the information collected from you in order 1) to provide our services and process your transactions and 2) to provide customer service. Specifically, we use your information to help you complete a transaction, communicate back to you, update you on service and benefits, and to personalize our web sites for you.

We provide access to a student's personally identifiable information only to those EOU employees who need that information in order to provide products or services to you.

### **Disclosure to Faculty and Advisors**

EOU faculty and advisors may view information necessary to provide services to you (i.e., class rosters, phone numbers, admission application information).

### **Disclosure to Third Parties**

EOU will not share any of your personally identifiable information with third parties except in the limited circumstances described below, or with your express permission (and to employees as described above), or to comply with applicable law.

1. If required by the Oregon Public Records Law, we share information with third parties. Some information is exempt from our disclosure. For example, student information is generally exempt from disclosure in compliance with the Federal Family Educational Rights and Privacy Act of 1974 (FERPA). FERPA allows institutions to define directory information that may be released. Directory information as defined by the OAR 579, Division 45 is the following: student's name, current mailing address and telephone number, email address (only the EOU address), class standing (freshman, sophomore, etc.), month and day (NOT year) of birth, major field of study, participation in officially recognized activities and sports, dates of attendance, degrees and awards received, date(s) of degree(s), most recent previous educational institution attended. Under the Public Records Law, you may ask us not to disclose information that contains your home address and telephone number under some circumstances. Oregon Revised Statutes 192.445 and Oregon Administrative Rule 137-004-0800 explain how to request non-disclosure.
2. We disclose the information we collect, as described in Section B above, to organizations that perform services on our behalf or to other institutions with whom we have joint service agreements (i.e., we disclose information to community colleges so that Financial Aid eligibility can be determined when

students attend both institutions; there is also an additional consent form signed by the student). These organizations are subject to confidentiality agreements with us and other legal restrictions that prohibit using the information except to provide the specified related services, unless you have agreed or given your prior permission for other uses.

3. We disclose information that we in good faith believe is appropriate to cooperate in investigations of fraud or other illegal activity, or to conduct investigations of violations of our Acceptable Use Policy.
4. We disclose information in response to a subpoena, warrant, court order, levy, attachment, order of a court-appointed receiver or other comparable legal process, including subpoenas from private parties in a civil action.
5. We disclose information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).
6. We share aggregated statistical data with industry researchers or for public relations. For example, we may disclose that a specific percentage of our students are Oregon residents. However, this aggregated information is not tied to personally identifiable information

### **C. Information Security**

While no computing environment is 100% secure, we take every precaution to protect the user's information. When a user submits sensitive information via the web, that information is protected both on-line and off-line.

EOU does not store your credit card information. EOU uses US Bank to verify your credit card information. US Bank may only use your credit card information for those purposes. US Bank will have access to your credit card number as necessary to perform the verification function, but they are required to maintain the confidentiality of your information and are prohibited from using your credit card information except to provide services to EOU. US Bank's privacy statement can be viewed at [http://www.usbank.com/cgi\\_w/cfm/about/privacy/consumer\\_privacy.cfm](http://www.usbank.com/cgi_w/cfm/about/privacy/consumer_privacy.cfm) We restrict access to your personally identifiable information to employees who need to know that information in order to provide products or services to you.

The security of your Webster account also relies on your protection of your Webster PIN. We strongly suggest that you never share your PIN with anyone. EOU representatives will never ask you for your password, so any e-mail or other communication requesting your PIN should be treated as unauthorized and suspicious. If you do share your Webster PIN with a third party for any reason, the third party will have access to your account and your personal information, and you may be responsible for actions taken using your PIN. If you believe someone else has

obtained access to your PIN, please change it immediately by logging in to your account at <http://www.ous.edu/webster> and also contact us right away as described in Section F, Contacting Us, below.

### **Tips for Safe Transactions**

1. Use an SSL-capable browser such as Microsoft Internet Explorer 7 (or higher) or Mozilla Firefox 3 (or higher ) with 128-bit encryption (40-bit encryption secures your information, but 128-bit provides more security).
2. Don't walk away from your computer when in communication with our servers.
3. Safeguard your PIN and other identifying numbers and do not share them with others.
4. Keep personal information such as your mother's maiden name and identifying numbers (including your Social Security, driver's license, passport, and credit card numbers) in a safe and secure place. Do NOT share this information unless you know the purpose for which it will be used.
5. Before anyone else uses your computer, restart your browser (this eliminates copies of Web pages that have been stored in your hard drive). The preference menu in your browser can tell you how to clear your cache.
6. Always click the **Signoff** link when ending your Webster session, and close the browser window whenever possible.

### **D. Acceptance of Privacy Policy Terms and Conditions**

By using this site, you signify that you understand how your privacy is protected and how your personal information will be used. We reserve the right, at our sole discretion, to change, modify, add, or remove portions of this policy at any time. Your continued use of the EOU Webster site following the posting of any changes signifies that you are comfortable with changes to the privacy policy and have accepted those changes. If you have any questions or concerns, please contact us as described in Section F below.

### **E. Links to Other Web Sites**

Our web site may contain links to sites not owned by EOU. Please be aware that EOU is not responsible for the privacy practices of non-EOU sites. Other non-EOU web sites, may have their own privacy policy which should be reviewed.

### **F. Contacting Us**

If you have questions about our web site or concerns regarding privacy, you may e-mail [helpdesk@eou.edu](mailto:helpdesk@eou.edu), call 541-962-3111 Monday through Friday between the

hours of 8:00am and 5:00pm Pacific Standard Time, or write us at: Information Technology Department, Eastern Oregon University, One University Blvd., La Grande, OR 97850.

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