

Pathways of North Carolina

A Privacy Policy Statement from Pathways of North Carolina

Effective as of September 19, 2008

Pathways of North Carolina recognizes and respects the privacy interests of Pathways of North Carolina users. It is committed to protecting that privacy and keeping users informed about our privacy policy.

As Pathways of North Carolina evolves, we may update this privacy policy statement to reflect changes in the manner in which we deal with personal information, whether to comply with then-applicable regulations and self-regulatory standards or otherwise. The privacy policy posted here will always be current. We encourage you to review this statement regularly.

WHAT THIS PRIVACY POLICY STATEMENT COVERS:

- Pathways of North Carolina privacy policy and its exceptions
- The personal identifying information we collect
- Reasons we collect personal identifying information
- Ways in which personal identifying information may be used
- With whom personal identifying information may be shared
- Security measures to protect information entrusted to Pathways of North Carolina
- Cookies
- Links
- Modifying and deleting your information
- Amending this Privacy Statement
- Questions

PATHWAYS OF NORTH CAROLINA'S PRIVACY POLICY AND ITS EXCEPTIONS

Except as set forth below, personally identifiable data you enter on CFNC.org is not made available or distributed to third parties, except with your express consent or at your express direction. In particular, Pathways of North Carolina (including the University of North Carolina General Administration (UNCGA) which administers the Pathways of North Carolina program) will not give, sell or provide access to your personal information to any company, individual or organization for its use in marketing or commercial solicitation or for any other non-permitted purpose, except with your express consent, as is necessary for the operation of this site, or pursuant to one of the exceptions listed below.

Exceptions to the privacy policy

There are limited exceptions to the Pathways of North Carolina privacy policy. When required by law to comply with any valid legal process such as a search warrant, subpoena, statute, regulation or court order, UNCGA will supply such information contained in your CFNC account as UNCGA reasonably determines, based on the advice of counsel, it is legally required to supply. In addition, UNCGA may release specific information relevant to special cases, such as a physical threat to you or others or an attempted breach of security on the Pathways of North Carolina site.

THE PERSONAL IDENTIFYING INFORMATION WE COLLECT

Pathways of North Carolina collects personal identifying information from you including, but not limited to, your name, date of birth, address, e-mail address, telephone number, grade level, parent's e-mail address, such additional information as you choose to include in your user profile or are required to provide by the college and financial aid applications that you choose to complete, and information associated with activities you have undertaken on CFNC.org.

REASONS WE COLLECT YOUR PERSONAL IDENTIFYING INFORMATION

Pathways of North Carolina collects personal information from you primarily for three reasons. The first reason is to perform a task on CFNC.org, such as filling out a specific college admission application,

requested by you. The second reason is to enable you to submit in a convenient and efficient manner information that is likely to be needed when you complete college admission, financial aid and other applications and forms made available through Pathways of North Carolina or undertake a scholarship search on CFNC.org, and the third reason is to enable to respond to your questions or contact you when necessary in connection with the functioning of CFNC.org. When the effective functioning of a Pathways of North Carolina module does not require personal information, none is collected, and any such module can be accessed without opening an account or providing any personal data.

When you log on to CFNC.org, your browser will automatically transmit to CFNC.org's server the IP address of your computer, type of browser you are using and certain other information relating to your computer and its use. Although your browser transmits this information, Pathways of North Carolina does not associate the IP address of your computer or any of this other information transmitted by your browser with any personally identifiable information regarding you. Pathways of North Carolina does not collect any personally identifiable information other than what users submit and their browsers transmit.

WAYS IN WHICH PERSONAL IDENTIFYING INFORMATION MAY BE USED

Pathways of North Carolina will use your personal identifying information to complete the following forms and surveys, to obtain information for you and to effect transactions on your behalf, in each case only upon your instructions to do so:

- Transmit applications for admission
- Transmit requests for electronic high school transcripts
- Transmit financial aid applications
- Transmit financial aid calculators
- Transmit a scholarship search
- Transmit freshman planners, which can assist you in selecting courses and otherwise planning to meet admission requirements
- Communicate your interest in or your requests for information or material to colleges or other institutions you have specified

Your personal identifying information may also be used for the following purposes:

- We may use your personal identifying information for enrollment verification purposes.
- We may use your identifying information to help diagnose problems with CFNC.org's server and to administer the CFNC.org website.
- Summary data representing a compilation of aggregate data representing CFNC.org users may be collected by UNCGA and provided to various entities including colleges and other educational institutions represented on CFNC.org. **NO PERSONAL IDENTIFYING INFORMATION IS MADE AVAILABLE AS PART OF THESE SUMMARY REPORTS, AND THE DATA IS AGGREGATED IN SUCH LARGE SETS THAT NO PERSONAL INFORMATION CAN BE IDENTIFIED.** Some examples of summary data are the number of monthly visitors to the site, the number of admission applications submitted over CFNC.org, and the CFNC.org functions utilized by students in specified age or grade ranges.

WITH WHOM PERSONAL IDENTIFYING INFORMATION MAY BE SHARED

In each of the circumstances described below, data specifically required to perform a task you request will be made available to a recipient you designate:

- If you submit an application for admission to a college or other educational institution, the personal data required to transmit that application will be provided on your behalf to the admissions office of the institution to which you are applying.
- If you start an application for admission to a college or other educational institution, your name and other data entered on that application may be provided to the admissions office of that institution, even though you have not yet submitted that application to that institution.
- If you request that a copy of your electronic high school transcript be sent to a college or other

educational institution, the personal data required to transmit that request will be provided on your behalf to the North Carolina Department of Public Instruction and the admissions office of the institution to which you have requested the transcript be delivered.

- If you request that your data be transferred to FAFSA on the Web to help you fill out your federal financial aid application, data relevant to that application will be provided to a processor specified and authorized to process your financial aid applications (FAFSA) by the U.S. Department of Education.
- If you request that a college or other educational institution send you material or save a college or education institution in your My CFNC profile, your contact information will be provided to that institution.
- If you register for the College Redirection Pool, your contact information will be provided to all CFNC institutions.
- If you register for the Transfer Assured Admissions Policy (TAAP), your contact information will be provided to all CFNC institutions.
- Unless you opt out, your My CFNC profile will automatically be associated with the specific high school you select on the Student Planner section of CFNC.org. Information saved in your My CFNC profile will be made available to qualified educational professionals at the school you select. Please be aware that those whom you have authorized will be permitted to view personally identifying information about you unless you opt-out. If you do not opt-out, this will constitute consent to share education records under Family Educational Right and Privacy Act (FERPA).

UNCGA, which administers the Pathways of North Carolina program, will have access to your personally identifying information. UNCGA will treat personally identifying information you enter on CFNC.org as educational records under the provisions of the Family Educational Right and Privacy Act (FERPA). These educational records will receive from UNCGA the privacy protections afforded by FERPA. UNCGA will consider as "directory information," and thus not protected from disclosure, the following:

- name
- date and place of birth
- addresses: local and permanent
- email and telephone number(s)
- institution(s) applied to and major(s) declared (if any)
- dates of application and/or intended attendance
- previous institutions attended
- degree(s) earned
- honors / awards received and honorary organizations
- participation in officially recognized activities and sports

When visiting CFNC.org, you may link from CFNC.org to other websites for a variety of purposes such as visiting an official college website. This Pathways of North Carolina privacy statement does not apply to any other website, including websites to which CFNC.org may be linked. For your protection, we recommend that you read and understand the privacy policy at any website prior to providing personal information on that website.

SECURITY MEASURES TO PREVENT MISUSE OF INFORMATION ENTRUSTED TO PATHWAYS OF NORTH CAROLINA

Pathways of North Carolina causes the data you input to be encrypted when in route between your browser and the CFNC.org server and when in route between the CFNC.org server and some other browser or server. This practice helps prevent unauthorized third parties from intercepting and gaining access to your private data during transmission over the Internet. CFNC.org uses Secure Socket Layer encryption supported by both Netscape's and Microsoft's browsers.

Data residing on the CFNC.org server is password protected, and access is provided only to the account holder who created the password, anyone to whom that account holder entrusted the password, those

employees who require such access to administer and maintain the CFNC.org system or to provide requested customer support to users of CFNC.org, and those employees of UNCGA who require such access to create reports based on aggregated information that is rendered no longer personally identifying in the aggregation process. Each employee who has access to the data residing on the CFNC.org server has agreed in writing to respect the privacy of all such personal data.

COOKIES

A "cookie" is a small file that a website transfers to a user's computer, which may then be stored on its hard drive. Pathways of North Carolina uses cookies to remember you and personalize your web-viewing experience by keeping track of your session when logged on to CFNC.org. Cookies enable you to maintain continuity as you move from page to page on CFNC.org and to avoid the nuisance of being asked to provide the same information repeatedly. Cookies also allow us to make sure that only your browser can exchange information regarding your account with our servers. Cookies cannot be used to steal personal information or to gain access to information that you did not directly provide. The cookies we use are set when you log on to CFNC.org and are erased when you log off CFNC.org or completely close your browser.

Don't want cookies?

Most browsers are initially set to accept cookies. If you don't want cookies, you can set your browser to disable or refuse cookies or to alert you when cookies are being used. You should note, however, that various CFNC.org services might not function properly when cookies are not utilized.

LINKS

CFNC.org hosts links to other sites or resources having privacy policies that may differ from those of Pathways of North Carolina. It is not responsible for the privacy practices or the content of those websites. UNCGA and the colleges and the associations of colleges and agencies represented on CFNC.org do not have control over and do not endorse such external sites and resources. UNCGA, and the colleges, association of colleges or any other state agency represented on CFNC.org shall not be liable for any content, advertising, products or other materials on or available from such sites or resources. In addition, UNCGA, the colleges, association of colleges or any other state agency represented on CFNC.org shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods or services available on or through any such site or resource.

MODIFYING YOUR INFORMATION

You may modify the personal information data stored on CFNC.org you previously provided. To modify personal information, (i) log on to CFNC.org, (ii) access either your user profile or an application containing the information you want to change, and (iii) modify that information using standard word-processing techniques. To delete non-required personal information, (i) log on to CFNC.org, (ii) access your user profile, and (iii) delete the information you want to remove from CFNC.org using standard word-processing techniques. Please recognize that if you delete information, it will no longer be available on CFNC.org so that, for example, if a college to which you previously submitted an application were to attempt to retrieve that application from CFNC.org after you made the deletion the deleted information would no longer be accessible. Similarly, when accessed over CFNC.org, information that has been updated or otherwise modified will appear in its then-most current form, rather than in the form in which it may have been submitted at some earlier time.

AMENDING THIS PRIVACY STATEMENT

Pathways of North Carolina may amend this Privacy Statement from time to time. If Pathways of North Carolina makes any substantial changes to this Privacy Statement concerning use of your personal identifying information, it will notify you by posting a message on the CFNC.org homepage. If feasible, the notice will be posted for at least thirty days before taking effect.

QUESTIONS:

If you have any questions about this privacy statement and the privacy practices on this site, you may

contact us at privacy@cfnc.org.