# **Pathways of North Carolina Privacy Statement**

Effective October 1, 2016

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#### 1. Introduction

Pathways of North Carolina is a program within the University of North Carolina System with responsibility for some areas of CFNC.org related to planning and applying for college. Pathways of North Carolina recognizes and respects the privacy interests of CFNC.org users, and is committed to protecting that privacy and keeping users informed.

As part of the UNC System, Pathways of North Carolina adheres to all relevant federal and state policies for educational institutions. Pathways of North Carolina may periodically update this privacy policy statement to comply with applicable regulations or self-regulatory standards. The most current version of this privacy policy statement will always be available on CFNC.org for users to review.

Users of Pathways of North Carolina resources must agree to, and abide by, the <u>CFNC.org Terms of Use</u>. This Privacy Statement further describes how Pathways of North Carolina uses and protects the Personally Identifiable Information (PII) submitted by participants in the program.

### 2. The PII Pathways of North Carolina Collects

Pathways of North Carolina collects PII from you (the user) including, but not limited to, your name, date of birth, address, email address, telephone number, year of high school graduation, parent's email 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.

### 3. How PII is Used

Pathways of North Carolina may collect PII from you to enable you to utilize CFNC.org services including, but not limited to:

- a) To enable you to perform certain tasks and activities on CFNC.org, such as completing a college admission application, sending a transcript, completing a career assessment, or communicating your interest in or your requests for information to colleges you have specified.
- b) To enable you to submit or store in a convenient and efficient manner information that is likely to be needed when you perform tasks and activities on CFNC.org.

- c) To enable us to respond to your questions.
- d) To contact you when necessary in connection with the effective functioning of CFNC.org.

Pathways of North Carolina may also collect and use your PII to enable internal processes and research such as:

- a) To enable enrollment verification, or
- b) To help diagnose problems with CFNC.org's server and to administer the CFNC.org website.

# 4. Sharing of PII

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:

- a) 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.
- b) 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.
- c) 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 institution to which you have requested the transcript be delivered. Employees, volunteers, or contractors at your school or your school district may have access to PII if it is necessary for the performance of their responsibilities.
- d) If you request that a college or other educational institution send you material or if you save a college or education institution in your My CFNC profile, your contact information will be provided to that institution.
- e) If you register for the College Redirection Module, your contact information will be provided to all NC institutions participating on the CFNC.org website.
- f) If you register for the Transfer Assured Admissions Policy (TAAP), your contact information will be provided to all UNC institutions.
- g) Unless you do not specify a connection in your account, Your My CFNC profile will be associated with the specific school (such as a middle school or high school) or program (such as an in-school or after-school program) you select on CFNC.org. Information saved in your My CFNC profile will be made available to employees, volunteers, or contractors at the school or program you select and, if your school is a public high school, to employees, volunteers, or contractors at the district in which your school is located.

PII you enter on CFNC.org is not made available or distributed to third parties, except with your express consent or at your express direction, or as allowed by state and federal law and this Privacy Policy and the <u>CFNC.org Terms of Use</u>. In particular, Pathways of North Carolina will not give, sell or provide access to your PII to any company, individual or organization for its use in third party marketing or commercial solicitation or for any other non-permitted purpose, except 1) with your express consent, as is necessary for the operation of this site, or 2) when required by law to comply with any valid legal process such as a search warrant, subpoena, statute, regulation or court order, or

3) in special cases, such as a physical threat to you or others or an attempted breach of security on CFNC.org.

### 5. Use and Sharing of Non-PII Data

Summary data representing a compilation of aggregate data representing CFNC.org users may be collected by Pathways of North Carolina and provided to various entities including colleges and other educational institutions represented on CFNC.org. No PII is made available as part of these reports. Some examples of summary data are the number of monthly visitors to the site, the number of admission applications submitted through CFNC.org, and the CFNC.org functions utilized by students in specified age or grade ranges.

### 6. Links from CFNC.org

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.

# 7. Modifying Your PII

You may modify the personal information data stored on CFNC.org you previously provided. To modify personal information, 1) log on to CFNC.org, 2) access the areas your user profile or any other areas containing the information you want to change, and 3) save your changes. Please recognize that if you delete or change information, it will no longer be available on CFNC.org, and this could impede for example, the ability a college has to contact you. Also note that changing or deleting your information on CFNC.org does not impact information you submitted previously through CFNC.org or available to others previously through CFNC.org. For example, you will not be able to unsubmit an application or transcript that you previously sent to a college.

# 8. Amending this Privacy Policy Statement

Pathways of North Carolina may amend this statement from time to time. If Pathways of North Carolina makes any substantial changes to this Privacy Policy Statement concerning use of your PII, 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.

### 10. Questions

If you have any questions about this Privacy Policy Statement and the privacy practices on this site, you may contact Pathways of North Carolina at cfnc@northcarolina.edu.