

## Online Privacy Statement

This Online Privacy Statement applies to the information that we collect when you visit Bentley University's main website ([www.bentley.edu](http://www.bentley.edu)) and other websites that we own or control and link or refer to this Privacy Statement (together, the "Sites"). This Statement describes how this information is processed, as well as the choices that are available to you regarding the use of the information you provide.

Unless otherwise indicated on a specific Site, Bentley University ("Bentley") is the data controller for all information collected under this Statement. Contact information for Bentley is listed at the end of this Statement.

This Statement does not apply to information collected from or about current or former employees, contractors, volunteers, and other workers of Bentley University ("Workers") as part of their employment or working relationship with Bentley.

### **Personal Information we collect and process:**

When you access or use the Sites, we may collect and process the following types of information from you:

"Personal Information" is any information that we can reasonably use to identify you. If you are located in the European Economic Area (EEA), Personal Information includes all Personal Data as defined under EEA laws.

"Sensitive Personal Information" includes special categories of Personal Information (e.g., racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, and data concerning a natural person's sex life or sexual orientation) for which applicable law provides enhanced protections.

## **Students:**

### **Collected and Processed -**

The University will keep a record of the details you provided on your application form, any supporting documents requested as part of your admission process and additional details provided by you. We will also maintain records about your studies at Bentley, and about your use of the academic and non-academic facilities and services that we offer. This personal information will include data such as your name, home address, date of birth, course of study, fee payments, and information about your examinations, assessments and results.

### **Purpose and Legal Basis -**

The University will process your personal information for a range of contractual, statutory, University, or public interest purposes, including the following:

- To deliver and administer your education, record the details of your studies (including any placements with external organizations), and determine/confirm your academic achievements (e.g. results, awards).
- Where relevant, to monitor, evaluate and support your research activity.
- To administer the financial aspects of your relationship with us and any funders.
- To deliver services to you (e.g. IT, athletics, libraries, accommodation, careers, housing).
- To enable your participation at events (e.g. functions, graduation).
- To communicate effectively with you by mail, email and phone, including the distribution of relevant newsletters and circulars.
- To operate security, governance, disciplinary (including plagiarism and academic misconduct), complaint, audit and quality assurance processes and arrangements.
- To support your training, medical, safety, and welfare requirements and your religious, spiritual, ethical, and cultural life.
- To compile statistics and conduct surveys and research for internal, statutory reporting, or public or legitimate interest purposes.
- To fulfill and monitor our legal obligations under equal opportunity, immigration and public safety laws and regulations, and for the establishment, exercise or defense of legal claims.
- To enable us to contact others in the event of an emergency.

## Applicants:

### Collected and Processed -

- **Contact Information:** for example, your name, home address, email address and phone number;
- **Demographic Information:** for example, gender, age, and other information you may volunteer, such as in your application or essay;
- **Education History:** for example, your prior schools, transcripts, school activities and disciplinary records;
- **Testing History:** for example, standardized testing and corresponding identity verification documentation;
- **Personal Information and History:** for example, personal interests, extracurricular activities, recommendations, other personal information you may choose to volunteer, including in your application or your essay, and other information we may learn about your background;
- **Employment History:** for example, job title, location and work experience;
- **Personal Financial Information:** for example, government identification number, personal and business tax reports, wage reports and statements, bank statements, socioeconomic status, scholarships and grants, and family support;
- **Family Information:** including family member names, ages, education information, occupations, wages and savings; and
- **Payment Information:** depending on your means of payment, your payment card number or your bank and bank account number.

### Purpose and Legal Basis -

The Personal Data collected by us, or on our behalf, during the admissions process is collected and processed for the primary purpose of considering your application for admission to Bentley. Bentley will process the Personal Data provided on your application and the other information referred to above for the purposes of identifying you, processing your application, verifying the information provided, deciding whether to offer you admittance and/or financial aid, and communicating that outcome.

## Alumni, Student Family Members, Donors, University Identified Friends:

### Collected and Processed -

- **Contact Information:** for example, your name, home address, email address, phone number and social media usernames;
- **Demographic Information:** for example, gender, age, and other information you may volunteer or that we gather through public sources;
- **Personal Information and History:** for example, personal interests, charitable activities, other personal information you may volunteer or that we gather through public sources;

- **Education History:** for example, prior and subsequent schools, awards, honors and student activities;
- **Employment Information:** for example, your title, employer, location and work experience;
- **Bentley Affiliations:** for example, your social network, group memberships and Bentley-related correspondence;
- **Family Information:** for example, family member names, ages, occupations, and relationships;
- **Financial Information:** for example, your contribution history, publicly available data on wealth and assets, and contributions to other organizations;
- **Contribution History:** your contribution history to Bentley;
- **Health and Dietary Information:** for example, conditions that may require additional accommodations or dietary preferences, if you volunteer such information; and
- **Your Image:** for example, when a photograph or other image is used in online networking or announcements, or when you participate in Bentley events that are recorded by photography or video.

## Purpose and Legal Basis -

We process your Personal Data for the purposes described above on the basis of our legitimate interests, such as -

- Request gifts or donations;
- Providing you opportunities to connect and be involved with the Bentley community;
- Processing transactions requested by you;
- Meeting our contractual obligations (e.g., registration for events or processing of donations);
- Necessary compliance with a legal obligation (e.g., to provide required tax information);
- Or, where applicable, on the basis of your consent.

## Cookie Policy

This Cookie Policy applies to the cookies we use when you visit Bentley University's main website ([bentley.edu](https://bentley.edu)) and other websites that we own or control.

This Cookie Policy provides you with more information about cookies, what types of cookies we use and how we use them. Our Sites use cookies with the intention of providing you with a user experience that best suits your needs, while concurrently allowing us to improve the design and functionality of our Sites. Cookies can be adjusted or disabled, and this policy provides you with instructions to do so.

## Cookies

A cookie is a file designed to contain a small amount of user and website information stored on a user's computer. The file interacts with the user and the website to provide a webpage tailored to the user through its awareness of information held within the file. Cookies also have the ability to carry all or parts of the information stored within the file to other websites that the user may visit or to third parties.

### Types of Cookies

- A third-party cookie is placed by a domain other than that of the website the user is visiting.
- A session cookie is temporary, linking the actions of a user during the any given browser session. When the browser is closed, the cookie is deleted.
- A permanent cookie, also known as a persistent cookie, is stored for a specific period of time and activates each time the user visits the website that created the cookie.

### Our Use of Cookies

We use third-party, session and persistent cookies and similar technology to collect aggregate (non-personal) information about Sites usage by all of our visitors and to help us remember you and your preferences when you revisit the Sites. These cookies may stay on your browser into the future until they expire or you delete them. We also use technology to remember you the next time you log in. Some of these cookies are erased when you close your browser window and some persist for a period of time. Further general information about cookies and how they work is available at [www.allaboutcookies.org](http://www.allaboutcookies.org).

We may allow selected third parties to place cookies through the Sites to provide us with better insights into the use of the Sites or user demographics or to provide relevant advertising to you. These third parties may collect information about a user's online activities over time and across different websites when he or she uses our Sites.

### Adjusting Cookie Settings

You can change your cookie settings by reviewing your internet browser's cookie options. The links below to popular browsers may help you understand your cookie options better. Typically, such information can be found under the browser's "Help," "Preferences" or "Options" menus.

- [Cookie settings in Chrome](#)

- [Cookie settings in Firefox](#)
- [Cookie settings in Edge or Internet Explorer](#)
- [Cookie settings in Safari -- iOS](#)
- [Cookie settings in Safari -- macOS](#)

## Blocking Cookies

Should you choose to decline or block cookies by adjusting your browser settings, including cookies essential to the Sites. Please note that all or parts of our Sites may not be functional or accessible to you. Our Sites will issue cookies as soon you visit the Sites, unless your browser cookie settings are adjusted to prevent such an occurrence. Please review the information provided in this cookie policy on adjusting cookie settings for the browser of your choice.

## Google Analytics

We use Google Analytics to help operate our Sites more efficiently, to gather demographic information, and to monitor the level of activity of our Sites. For information on how Google uses data from sites that share information with Google, see <https://www.google.com/policies/privacy/partners/> (or other relevant URL that Google may provide from time to time). You can prevent the use of Google Analytics relating to your use of our Sites by downloading and installing the browser plugin available at this link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

## Sharing your Personal Information

We share your information internally at Bentley to facilitate and manage the purposes listed above. This includes third parties whom Bentley engages to process your Personal Information on our behalf for the purposes stated above, such as vendors who help Bentley with our marketing, application processing, and web hosting. Bentley may also share your personal data with government and law enforcement agencies or regulators to 1) comply with a legal process, subpoena, order or other legal or regulatory requirement applicable to us; 2) enforce our terms of use or other policies; or 3) pursue available legal remedies or defend against legal claims. Other third parties as you may so request as permitted by this and other Bentley University policies and applicable laws and regulations. Bentley University will not sell any personal information to third parties for their use in direct marketing, advertising, or promotion of their products or services.

## **International Transfer of Personal Information**

Personal information provided to us by users outside of the United States may be transferred to other countries such as the United States, where data protection laws may differ from those of your home country. By providing us with your information you acknowledge that your information will be transferred to the U.S. and processed on servers in the U.S. However, all reasonable steps will be taken to protect your privacy in accordance with the applicable data protection laws.

## **Non-personally identifiable information we collect and process**

Standard, non-personally identifiable internet log information such as browser type and navigation to various parts of the Sites, in an aggregated form, is collected for analytical purposes to improve the browsing experience of our Sites, update relevant content and improve the overall design.

## **Information security**

Bentley University takes the security of your personal information seriously. If you discover a security issue with the Sites please email [cybersecurity@bentley.edu](mailto:cybersecurity@bentley.edu). Our security policies and standards can be found at <https://www.bentley.edu/offices/it/policies-all>.

## **Marketing**

Personal Information you submit through our Sites, such as your name, address and other contact information, may be collected by Bentley University for internal marketing and development purposes as well as to respond to your inquiry, complete a transaction for you, or fulfill other forms of customer service. You can choose not to receive marketing from us by "unsubscribing" using the instructions in any marketing email you receive from us.

## EEA Data Subject Rights

If you are an individual located in the EEA only, you will have the following rights with regard to your Personal Data:

1. **Right of access** - You may request details of your Personal Information that we hold. We will confirm whether we are processing your Personal Information and we will disclose supplementary information including the categories of Personal Information, the sources from which it originated, the purpose and legal basis for the processing, the expected retention period, and the safeguards regarding Personal Information transfers to non-EEA countries, subject to the limitations set out in applicable statutes, regulations and other laws.
2. **Right of correction** - We will comply with your request to edit and update incorrect Personal Information promptly.
3. **Right to be forgotten** - At your request, we will delete your Personal Information promptly if:
  - It is no longer necessary to retain your Personal Information;
  - You withdraw the consent which formed the basis of your Personal Information processing;
  - You object to the processing of your Personal Information and there are no overriding legitimate grounds for such processing;
  - The Personal Information was processed illegally; or
  - The Personal Information must be deleted for us to comply with our legal obligations.
  - We will inform any third parties we might have shared your Personal Information with of your deletion request.
  - We will decline your request for deletion if processing of your Personal Information is necessary:
    - To comply with our legal obligations;
    - In pursuit of a legal action;
    - To detect and monitor fraud; or
    - For the performance of a task in the public interest.
4. **Right to restrict processing of your Personal Information** - At your request, we will limit the processing of your Personal Information if:
  - You dispute the accuracy of your Personal Information;
  - Your Personal Information was processed unlawfully and you request a limitation on processing, rather than the deletion of your Personal Information;
  - We no longer need to process your Personal Information, but you require your Personal Information in connection with a legal claim; or
  - You object to the processing pending verification as to whether an overriding legitimate ground for such processing exists.
5. **Right to notice related to correction, deletion, and limitation on processing** - In so far as it is practicable, we will notify you of any correction, deletion, and/or limitation on processing of your Personal Information.



6. **Right to data portability** - At your request, we will provide you free of charge your Personal Information in a structured, commonly used and machine readable format, if: (i) you provided us with Personal Information; (ii) the processing of your Personal Information is based on your consent or required for the performance of a contract; or (iii) the processing is carried out by automated means.
7. **Right to object** - Where we process your Personal Information based upon our legitimate interest, then you have the right to object to this processing.
8. **Right not to be subject to decisions based solely on automated processing** - You will not be subject to decisions with a legal or similarly significant effect (including profiling) that are based solely on the automated processing of your Personal Information, unless you have given us your explicit consent or where they are necessary for a contract with us.
9. **Right to withdraw consent** - You have the right to withdraw any consent you may have previously given us at any time. If you withdraw your consent, this will not affect the lawfulness of our collecting, using and sharing of your Personal Information up to the point in time that you withdraw your consent. Even if you withdraw your consent, we may still use your information that has been fully anonymized and does not personally identify you.
10. **Right to complain to a supervisory authority** - If you are not satisfied with our response, you have the right to complain to or seek advice from a supervisory authority and/or bring a claim against us in any court of competent jurisdiction.

If you wish to contact us in connection with the exercise of your rights listed above, please email us at [cybersecurity@bentley.edu](mailto:cybersecurity@bentley.edu). We will respond to your written request without unreasonable delay and in accordance with any deadlines imposed by law. Unless we notify you at the time of your request, we will not charge you any fee in connection with the exercise of your rights.

## Document Retention

We keep your Personal Information for as long as needed to fulfill the particular purpose for which it was collected. We may also retain your records if legally required or to fulfill a legitimate interest.

## Updates to Privacy Policy

Bentley reserves the right to modify this Privacy Statement at any time. Any such changes will be posted on this site. Your continued use of the Sites after any change in this Privacy Policy will constitute your acceptance of such change.

## Contact Information

For more information on how we collect and process your Personal Information, or if you have any complaints, please contact [cybersecurity@bentley.edu](mailto:cybersecurity@bentley.edu).

## Revision History

Version	Date	Author	Reviewers	Approvers	Notes
1.0	10/08/2020			Data Privacy Committee	
1.1	11/10/2023	David Norman		Executive Steering Committee	Minor updates to links and language