

Naropa University's Website Privacy Policy

Naropa University and its subsidiaries, subcontractors, suppliers, website vendors and affiliated companies ("Naropa" or University") own and operate a number of Internet domains, including but not limited to, the www.mynaropa.edu and www.Naropa.edu websites (collectively and individually the "Website"). This statement along with the Website Terms and Conditions which are incorporated herein, describe Naropa's Website privacy policies.

Section 1. Privacy Statement.

Naropa is required by state and federal laws to keep certain information confidential. Privacy and confidentiality is balanced with the need for the University to manage and maintain its networks, keep all members of our community safe and provide the services requested by our students and their families. Therefore in order comply with the law and perform transactions requested by authorized users of the Website, University officials may have direct access to personally identifiable information as identified in this Privacy Policy.

Section 2: Kinds of Information Collected

A Website user may choose how much Personally Identifiable Information to provide to us. Information collected online is often defined as being either personally identifiable or anonymous:

Personally Identifiable Information tells us who is using the Website and includes information you may request that we store on the website for your future use. We may need this information to provide a personalized or enhanced service that you request – such as online payments. While we hope that you will find it beneficial to judiciously provide Personally Identifiable Information to Naropa so that we can provide the best practical service to you, the amount of Personally Identifiable Information that you choose to disclose is a decision you make.

Anonymous Profile Information refers to information that cannot easily be tied back to a specific individual. For instance, we may know that 2,000 people visited this Privacy Policy page today, but we do not necessarily know their names or how to contact them.

Section 3. Personally Identifiable Information.

You may be asked at various times to provide data such as your name, e-mail address, phone number, credit card information, bank account information and address (the "Personally Identifiable Information"), as well as information specific to the service or transactions you are seeking from Naropa. Naropa collects Personally Identifiable Information online primarily for your convenience such as online payments and to make it easier for you to use the Website. It also permits Naropa to communicate with you and improve the Website and our services.

When you surf the Internet, your Internet browser automatically transmits some information to Naropa every time you access our Website. Examples of such information include the URL of the Web page you were just on (known as the "Refer"), the IP (or Internet Protocol) address of the computer you are using, and the browser version you are using to access our site. Some of this information may be collected by Naropa to help us improve our Website and our services. For instance, we may use this information to ensure the content you request is presented in the best format.

To activate some of the features available within the Website, we may assign "cookies" to your Internet browser. On our system, a cookie is a small text file that contains a unique identification number stored on your computer. This unique identification number automatically identifies your browser to our server computers when you interact with our Website. When you agree to provide Personally Identifiable Information directly to us, we may assign cookies that identify you, personally, to our servers.

Section 4. Anonymous Profile Information.

Many of the pages in our Website collect Anonymous Profile Information. The creation of an anonymous profile allows Naropa to identify the information that users find most useful. We may use these anonymous profiles to improve our Website's content and format, and University services. This is essential to our ability to provide high quality content to you.

Section 5. How Information is Used.

If you elect to provide Personally Identifiable Information on the Website, Naropa may use that information for transactions you have authorized, internal research or to correspond with you.

If you correspond with us through letters or email messages, we may store such correspondence with whatever other information you have provided to us. By engaging in transactions with Naropa or submitting correspondence to Naropa, you agree that we may store the relevant information and contact you in response.

In addition to the other uses described in this section, Naropa will use the Personally Identifiable Information you provide to us and information we collect about your use of our Website to improve access to our Website, improve the content and organization of our Website, resolve disputes, and correct technical problems with the Website.

Naropa reserves the right to use such information for any lawful purpose, including but not limited to recruiting, marketing, performance monitoring and statistical analysis. Naropa may also preserve, access, monitor or disclose information containing Personally Identifiable Information and other information, subject to the requirement of federal and state law, in the following situations:

- (A) Preserving information and otherwise responding to requests of law enforcement, federal and state agencies, court ordered disclosure, discovery in litigation and all other compulsory legal processes.
- (B) Naropa business or research.
- (C) To preserve, access, and monitor information, accounts and equipment in the course of an investigation of misconduct, violations of law or violations of University policy by students, faculty or staff.
- (D) As part of assigned responsibilities University staff may have access to all information and are restricted to using it for the purposes associated with the requirements of their position.

- (E) Maintaining networks, auditing networks, and preventing or responding to security breaches.

Section 6. No Distribution of Information to Third Parties.

Naropa's policy is to retain Personally Identifiable Information only for our use. We do not sell your Personally Identifiable Information to third parties. Although we use industry standard hardware and software designed to protect your privacy, we cannot guarantee and you should not expect that the Personally Identifiable Information you submit to us will always remain confidential.

Our server computers may retain whatever Personally Identifiable Information you have provided to us, and such data could potentially be made available for distribution to third parties as required by law, such as to law-enforcement agencies or pursuant to subpoenas or other court orders. Naropa may also share both Anonymous Profile Information and Personally Identifiable Information to investigate allegations of fraud or other unlawful activities, civil offenses, and violations of our Terms and Conditions of Use. In such case, Naropa shall have no obligation to notify you of, or to decline, any appropriately documented request for Personally Identifiable Information or Anonymous Profile Information.

Section 7. Other Websites.

This privacy statement applies solely to information collected by the Website. Naropa does not control the information collection and distribution policies on Internet domains other than on Naropa Internet domains. As a service to our users, the Website may provide links to other sites. Naropa is not responsible for the privacy practices of such other sites. We encourage all users to read the privacy statements of each and every website.

Section 8. Changing your Personally Identifiable Information.

To review or change the Personally Identifiable Information you have previously provided to Naropa, please contact the university Registrar at registration@naropa.edu.

Section 9. Family Educational Rights & Privacy Act Notification of Rights

In addition to the rights conveyed to you by this Privacy Policy, the Federal Family Educational Rights & Privacy Act (FERPA) affords students certain rights with respect to their education records. These rights include:

- (A) The right to inspect and review the Student's Education Records within 45 days of the day the University receives a request for access.
- (B) The right to request the amendment of the Student's Education Records that the Student believes are inaccurate, misleading, or otherwise in violation of the Student's privacy rights under FERPA.
- (C) The right to provide written consent before the University discloses personally identifiable information from the Student's Education Records, except to the extent that FERPA authorizes disclosure without consent.

(D) The right to restrict Naropa's use of Student's Directory Information, which otherwise will be shared freely by the University.

(E) The right to file a complaint with the U.S. Department of Education concerning alleged failures by Naropa to comply with the requirements of FERPA.

Please see Naropa University's Family Educational Rights and Privacy Act Policy for information.

Section 10. Privacy Policy Updates.

Naropa reserves the right to update this policy. When we do, we will place a notice on our Website. Naropa also reserves the right to send registration confirmations, service alerts and similar messages to our users to inform them of specific changes that may impact their ability to use our Website.

Section 11. Consent.

By using this Website, you agree to all of the terms of this Privacy Policy and this Website's Terms of Use. If you do not agree with any term of this Privacy Policy or our Terms of Use, please do not submit any Personally Identifiable Information.

Section 12. How to Contact Us.

Questions regarding this Privacy Policy should be submitted via e-mail to privacy@naropa.edu. Our address and phone number are:

Naropa University
2130 Arapahoe Avenue
Boulder, CO 80302
(303)444-0202