



## Privacy Policy

### Website

#### What We Collect and Why

Bottega University collects some anonymous information each time you visit its website, so it can improve the overall quality of your online experience. It collects your IP address, referral data, and browser and platform type. You do not have to register with Bottega University before we can collect this anonymous information.

Bottega University website does not require you to share information that identifies you personally, such as your name or e-mail address, for you to use the website. The Bottega University website may assign an anonymous ID number to your request(s) and links the following additional data to that number: the date and time you visited the website, your search terms, and the links upon which you choose to click. Like most standard website servers, we use log files to collect and store this anonymous user information. Bottega University analyzes the information to examine trends, administer the site, track user's movement in the aggregate, and gather broad demographic information for aggregate use.

From time-to-time the Bottega University website requests information from you that may identify you personally in addition to the anonymous information described above. The requested information typically includes contact information (such as name, e-mail address, shipping address, and zip code), and demographic information (such as age, gender, occupation, and household income). Bottega University will not use or disclose your individual user information except as described in this privacy policy and without first obtaining your consent.

#### Cookies

Bottega University may set and access Bottega University or partner cookies on your computer. A cookie is a small data file that a website may send to your browser and which may then be stored on your system. We may occasionally use both session cookies and persistent cookies. For the session cookie, once you close the browser, the cookie simply terminates. A persistent cookie is a small text file stored on your hard drive for an extended period of time. Persistent cookies can be removed by following Internet browser help file directions.

We use cookie and web beacon technology to track which pages on the Bottega University websites our visitors view and which Web browsers our visitors use. We may also use cookies to help us provide personalized features and preferences to you within various Bottega University websites in a way that may be linked to individual user information that you elect to share with us. We may also use "action tags" to assist in delivering the cookie. These action tags allow us to compile statistics and other data about our customers on an aggregate basis,



by embedding a random identifying number on each user's browser. Then we track where that number shows up on our site.

### **Special Notification with respect to Children's Privacy (Users under the age of 13)**

In response to concerns about protecting children's privacy online, Congress enacted the Children's Online Privacy Protection Act of 1998 ("COPPA"), which sets forth rules and procedures governing the ways in which websites may collect, use and disclose any personal information for children under the age of 13. In accordance with Bottega University policy and COPPA regulations, we DO NOT:

- Request or knowingly collect personally identifiable information online or offline contact information from users under 13 years of age; or knowingly use or share personal information from users under 13 years of age with third parties.
- It is possible that by fraud or deception we may receive information given to us or pertaining to children under 13. If we are notified of this, as soon as we verify the information, we will immediately delete the information from our servers.

### **Choice/Opt-out**

We desire to keep you in control of the personal information you provide to us. Accordingly, you can review, correct, change or remove the personal registration information you provide to Bottega University and that Bottega University controls.

If you do not want to receive e-mail from us in the future, please let us know by sending us email at: [support@bottega.edu](mailto:support@bottega.edu)

If you supply us with your postal address online, you may receive periodic mailings from us with information on new products and services or upcoming events. If you do not wish to receive such mailings, please let us know by calling us at (801)883-8336.

Persons who supply us with their telephone numbers online will only receive telephone contact from us with information regarding applying to the University. If you would not like to be contacted, please provide us with your name and phone number to ensure that we remove the correct person from the list.

### **Sharing**

Bottega University will make every effort to preserve your privacy. Bottega University may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a criminal investigation, a court order, or legal process served on our website. We may also share your personal information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of



any person, violations of Bottega University or such Bottega University websites' terms of use, or as otherwise required by law.

## Legal Notice

Notwithstanding any language to the contrary, nothing contained herein constitutes nor is intended to constitute an offer, inducement, promise, or contract of any kind. The data contained herein is for informational purposes only and is not represented to be error free. Any links to information not owned by Bottega University and/or its affiliates are provided as a courtesy. They are not intended to, nor do they constitute an endorsement by Bottega University and/or its affiliates of the linked materials, products, services, or information contained therein. Bottega University and/or its affiliates do not have any control over the privacy practices of these websites or information, and all visitors of these websites should read and understand the policies and privacy practices for external sites.

## Copyright Infringement

Bottega University is committed to complying with US copyright law and respecting the rights of copyright holders, while simultaneously defending the academic freedom of faculty and providing the optimal learning experience for students. Faculty and staff will make a good faith effort to only use or distribute third-party copyrighted materials as allowed by purchase, license, fair use, or other legal provision. Anyone who participates in the unauthorized distribution of copyrighted material may be subject to civil and criminal liabilities, in addition to sanctions imposed by Bottega University. For more information, please see the website of the US Copyright Office at [www.copyright.gov](http://www.copyright.gov), and the related frequently asked questions at [www.copyright.gov/help/faq](http://www.copyright.gov/help/faq). Pursuant to 17 U.S.C. Sec. 512(c)(2), notice of claims of copyright infringement should be directed to [support@bottega.edu](mailto:support@bottega.edu).

## Lawful Basis for Collecting and Processing of Personal Data

In order for educational institutions to educate their students both in class and on-line, it is essential and necessary that they have lawful bases to collect, process, use, and maintain data for its student, employees, applicants, and others involved in its educational programs. The lawful bases include, without limitation, admission, registration, delivery of classroom, on-line, and study abroad education, grades, communications, employment, program analysis for improvements, and records retention. Examples of data that Bottega University and/or its affiliates may need to collect in connection with the lawful bases are name, email address, IP address, physical address or other location identifier, photos, as well as some sensitive personal data obtained with prior consent.

Most of the collection and processing of personal data will include:

- Processing necessary for the purposes of the legitimate interests pursued by Bottega University and/or its affiliates or third parties in providing educational opportunities and employment.



- Processing necessary for the performance of a contract to which the subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Processing necessary for compliance with a legal obligation to which Bottega University and/or any of its affiliates is subject.
- The data subject has given consent to the processing of his or her personal data for one or more specific purposes. This lawful basis pertains primarily but not exclusively to the protection of research subjects.

There will be some instances where the collection and processing of personal data will be pursuant to other lawful bases.

### Types of Personal Data Collected and Why

Bottega University and/or its affiliates collect a variety of personal and sensitive data to meet one of its lawful bases, as referenced above. Most often the data is used for admission, registration, delivery of classroom, on-line, and study abroad education, grades, communications, employment, program analysis for improvements, and records retention. If you have specific questions regarding the collection and use of your personal data, please contact [support@bottega.edu](mailto:support@bottega.edu).

If a data subject refuses to provide personal data that is required, such refusal may make it impossible for Bottega University and/or its affiliates to provide education, employment, research or other requested services.

Personal data typically includes, but is not limited to:

<b>Data Type</b>	<b>Source</b>
First name, last name, address, and any other contact information that can directly or indirectly identify the data subject.	Collected directly from you, the data subject, through: application forms, online forms, emails, phone calls, chats, SMS, shared files.

### Individual Rights of the Data Subject under the EU GDPR

Individual data subjects covered by Bottega University Privacy Policy will be afforded the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.



- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organization.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review – if Bottega University refuses your request under rights of access, we will provide you with a reason as to why.
- Right to complain – if you wish to make a complaint about how your personal data is being processed by Bottega University.

All personal data and sensitive personal data collected or processed by Bottega University and/or its affiliates under the scope of the Bottega University Privacy Policy must comply with the security controls and safeguards of FERPA, GLBA, and PCI as set forth in the Bottega University Privacy Policy.

### **Retention Period**

Bottega University and/or its affiliates will process and store personal data for no longer than it is necessary for the specified above purpose(s).

### **Policy Updates**

Bottega University and/or its affiliates reserves the right to modify this privacy policy at any time. We encourage visitors to frequently check this page for any changes to this Privacy Policy. If we make changes, we will post an updated effective date below. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change. This policy has been updated on April 9, 2019.

### **Contact:**

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