

# Privacy Statement

Florida National University (“FNU,” “us” or “we”) recognizes the importance of privacy. In this Privacy Statement, we disclose our practices with respect to the Personal Information (defined below) that we collect about individuals, including its use and confidentiality.

## What information do we collect?

FNU collects Personal Information, defined as information that identifies, relates to, describes, references, is capable of being associated with, a particular consumer or device. FNU collects or may collect the following categories of Personal Information:

Category	Examples	Collected (Yes or No)
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	Yes
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with the other categories.	Yes
C. Protected classification characteristics	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Biometric information	Genetic, physiological, behavioral, and biological	No

	characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, electronic or software platform, application, communication, or advertisement.	Yes
G. Geolocation data.	Physical location or movements.	Yes
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
J. Non-public education information (per FERPA)	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcript, class lists, student schedules, student identification codes, student financial information, demographic information, or student disciplinary records.	Yes
K. Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes

Personal Information may be collected from you when you register for our products or services, or interact with our website, software platforms or other services. Personal Information may be collected by FNU directly, or indirectly by a service provider or other vendor we have contracted with in connection with our delivery of educational and other services. For example, Personal Information may be collected via a computer or mobile software application maintained by a vendor contracted by FNU.

Personal Information does not include:

- Publicly available information, including from governmental records.
- De-identified or aggregated consumer information.
- In the context of any relevant law, information otherwise excluded from the scope of Personal Information by such law.

**We may obtain the categories of Personal Information listed above from the following categories of sources:**

- Directly from our applicants and students. For example, from documents that our applicants and students provide to us related to the educational services and any other services they seek from us, including when applicants provide us contact or other information for the purpose of seeking information or services from us.
- Indirectly from our applicants and students or their agents. For example, through information we collect from third parties, including the U.S. Government and other educational institutions, concerning our applicants' and students' educational histories.
- Directly and indirectly from activity on or interaction with our website, software (including mobile applications), services or applications made available by FNU directly or through a service provider or vendor contracted by FNU. For example, from submissions through our website portals or website usage details collected automatically.
- From publicly available sources and from third parties that interact with us in connection with the services we provide. For example, from governmental agencies which assist in funding our students' educational costs.

## **What do we use Personal Information for?**

**Any of the Personal Information we collect may be used and/or disclosed for one of the following purposes:**

- To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs).
- To fulfill or meet the reason for which the information is provided. For example, if you provide information in an enrollment application or a financial aid application, we will use the information to make determinations about enrollment and the award of financial aid.
- For FNU's operational purposes as reasonably necessary and proportionate to achieve the operational purpose for which the personal information was collected or processed or for another operational purpose that is compatible with the context in which the personal information was collected.
- To provide you with information about the educational and other services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our educational services, or events or news that may be of interest to you.
- To verify your identity when you access an electronic account or portal at FNU and when you submit a request for information.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and FNU, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our applicants and students, or others.

- To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.
- As described to you when collecting your Personal Information.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer some or all of our assets whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred.
- To communicate with you on issues relating to determining your eligibility for our services, maintaining or servicing your account, providing customer service, processing or fulfilling orders and transactions, verifying your information, processing payments, providing financial aid processing, providing advertising or marketing services, providing analytic services, collections activity, responding to your questions or inquiries or notifying you if you won a promotion. We will also use your information to send you information about your account or about our relationship.
- To provide you with information about current or new products and services or other ads or marketing content, including by sending periodic emails.
- To secure your information by detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.

## **What Personal Information may we disclose to third parties?**

FNU does not sell Personal Information. FNU also complies with FERPA (defined below) with respect to the confidentiality and nondisclosure of student education records (as defined in FERPA).

However, we may disclose your Personal Information to the following categories of third parties:

- Entities owned in whole or in part by us or our parent company and/or its shareholders.
- Government agencies, regulators, accreditors, law enforcement and other authorities entitled to such Personal Information pursuant to law or regulation, and other parties permitted by applicable law or regulation to receive such Personal Information where a release is necessary or appropriate to protect the rights, property or safety of us, our applicants and students, or others.
- Authorized distributors of our products and/or services.
- A third party with a legitimate educational interest, in accordance with FERPA or similar applicable laws, or a third party where you have provided consent.
- Service providers and vendors that assist us in operating our services, website and other software platforms, conducting our business, or servicing you, such as, but not limited to:
  - Professional advisers including, but not limited to, auditors, bankers, insurers, legal counsel and professional subject matter experts.

- Learning management system providers and other software or electronic platform providers we have contracted with in connection with our delivery of educational and other services.
- Organizations we contract with for articulation (e.g., transfer of credit agreements) and affiliation purposes (e.g., internship/externship agreements).
- Organizations we contract with for employee benefit purposes.
- Background check providers for job candidates and/or students.

No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties unless required by law or legal process (such as pursuant to a binding subpoena). We may disclose such data to our service providers as needed for them to assist us in operating our services, if the service provider(s) are prohibited by contract from sharing the data with third parties or using it for any purpose other than assisting us in operating our services.

Information that is not Personal Information (i.e., non-personally identifiable information) may be provided to other parties for marketing, advertising, or other uses, to the extent permitted by applicable law.

## **How do we protect Personal Information?**

We implement a variety of security measures to maintain the integrity and security of your Personal Information. See “Gramm-Leach-Bliley Act Information Security Plan,” below, for additional information.

## **Do we use cookies or other tracking methods?**

Yes. Cookies are small files that a site or its service provider transfers to your computer through your Web browser (unless disabled via your browser) that enables the site’s or service provider’s systems to recognize your browser and capture and remember certain information. We or our vendors may place cookies on your computer. We or our vendors may also use electronic methods (sometimes referred to as tracking pixels or web beacons) to track whether a user has interacted with content on our website or in emails or other communications sent by us or on our behalf. Please see the chart in the “What information do we collect?” section, above, for additional detail. Please refer to your Web browser settings and instructions to determine how to limit or remove cookies or other tracking methods.

## **Family Educational Rights and Privacy Act (FERPA)**

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a federal law that protects the privacy of student education records. Information about students’

rights under FERPA can be found at <https://www.fnu.edu/current-students/financial-aid/consumer-information/> and in the University Catalog.

## Privacy Notice for California Residents

For California residents, the University's Privacy Statement is supplemented by the Privacy Notice for California Residents, which the University has adopted pursuant to the California Consumer Privacy Act of 2018 ("CCPA") and other California privacy laws. If you are a California resident, the Privacy Notice for California Residents can be found at: <https://www.fnu.edu/ccpa/>.

## Children's Online Privacy Protection Act Compliance

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act), and we do not knowingly collect any information from anyone under 13 years of age. Our website, software platforms, products and services are all directed to people who are at least 13 years old or older.

## GDPR Policy

The following sections apply to you if you are an individual located within the European Union (EU) and your Personal Data is processed in connection with Florida National University's ("FNU" or the "University") offering of goods or services within the EU. Personal Data means any information that allows you to be directly or indirectly identified. [Read More.](#)

## Gramm-Leach-Bliley Act Information Security Plan

[>> Read More](#)

## SMS Terms and Conditions

Florida National University has a standard message program for information alerts. Message frequency may vary by subscriber. Message and Data Rates May Apply.

To stop receiving text messages, please text STOP to the short code.

If you have any questions, please text HELP to the short code. For further assistance, please email [admissions@fnu.edu](mailto:admissions@fnu.edu) or call (305) 821-3333 to speak with one of our representatives.

US Carriers are not liable for delayed or undelivered messages.

[Link to Privacy Statement](#)

## **Updates to this Statement**

FNU reserves the right to amend this Privacy Statement at its discretion and at any time. We will give notice of updates to this Privacy Statement by posting a revised version on this webpage, and by notifying individual consumers directly if required by applicable law.

Last Updated: February 2023