

## PRIVACY NOTICE

Updated August 2020

The GAfutures, Pathways2GSFA, and REACH Georgia (“All Websites”) are designed by the Georgia Student Finance Commission, the Georgia Higher Education Assistance Corporation, and the Georgia Student Finance Authority (collectively hereafter “GSFC”) to provide you with a more personalized process for accessing education resources. As used on the site, the term “you” means any person who views, accesses, uses, or obtains information from the site, or who obtains information by monitoring activity to and from the site.

By using All Websites in any way, you agree to this Privacy Policy which will inform you of how we collect, share, and protect your personal information. We may update this privacy policy to reflect changes in the way we deal with personal information, whether to comply with then-applicable regulations and self-regulatory standards or otherwise. The privacy policy posted here will always be current. We encourage you to review this statement regularly.

### WHAT KINDS OF INFORMATION DO WE COLLECT?

#### **The Personal Identifying Information We Collect**

All Websites may collect personal identifying information from you including, but not limited to, your name, date of birth, social security number, address, e-mail address, and telephone number. Such information is captured in your account portfolio and is required to provide specific account information including but not limited to:

- Creation of account profile.
- Addressing questions or issues related to use of All Websites.
- Application for admissions to State of Georgia Colleges and Universities.
- Information on how you use All Websites such as the type of content and duration of activity.
- De-identified information about you from Google Analytics such as age, gender, location, and possible interest. This information does not connect to you specifically.

#### **Information from Third-Party Partners**

We receive information about you and your activities from third-party partners, such as information from a partner when we jointly offer services or from a third-party partner about your experiences or interactions with them.

### REASONS WE COLLECT YOUR INFORMATION.

GSFC collects personal information from you for the primary purpose of providing services to students. Specific information is provided regarding your account activity. At your consent, information may also be distributed using a mail or email address or text. Contact information is also needed to respond to inquiries or questions regarding student accounts. Where functions of All Websites modules do not require personal information, none is collected, and any such module can be accessed without opening an account or providing any personal data.

When you log on to All Websites, your browser will automatically transmit to the GSFC server the IP address

of your computer and type of browser you are using. Although your browser transmits the IP address of your computer, GSFC does not associate this IP address with any personally identifiable information regarding you. GSFC does not collect any personally identifiable information other than what you submit, and your browsers transmit.

### **HOW DO WE USE THIS INFORMATION?**

#### **Improve and Develop Services and Content**

We can deliver our services, personalize content, and make suggestions for you by using this information to understand how you use and interact with our content. In some cases, we rely on third parties to provide this content. We conduct surveys, research and test features to evaluate and improve products and services, develop new features, and conduct audits and troubleshooting activities.

#### **Communicate with You**

We use information to communicate with you about our services and content and let you know about our policies and terms. We also use your information to respond when you contact us for information or have questions.

#### **For Legal Reasons**

We will share personal information if we have a good-faith belief that sharing the information is necessary to comply with applicable laws, regulations, legal processes or governmental requests.

#### **Program Evaluation, Analysis and Improvement**

We may use information shared with us for purposes of program evaluation, analysis, and improvement. We may share aggregated, non-personally identifiable information publicly and with our third-party partners for similar program purposes.

#### **Keep All Websites safe and secure**

We use the information we have from you to help verify accounts and activity and promote safety and security. We may share information with third parties in order to continue to keep the site safe and secure.

### **WHAT WE DO NOT DO.**

We will not sell your personally identified information for any reason.

### **WHAT HAPPENS IF THIS PRIVACY POLICY CHANGES?**

This Privacy Policy replaces prior privacy policies issued by GSFC. The GSFC Privacy Policy may be modified when necessary to conform to federal, state, local, and international laws and regulations, among other reasons. Revisions to this Privacy Policy will be posted to All Websites. It is recommended that you check the Privacy Policy each time they visit the website. If you have specific questions regarding the collection and use of your personal data, please contact Information at [information@gafutures.org](mailto:information@gafutures.org).

### **WHAT ABOUT COOKIES?**

All Websites use cookies to remember you and personalize your web-viewing experience by keeping track

of your session when logged on to All Websites. Cookies enable you to maintain continuity as you move from page to page on All websites and to avoid the nuisance of being asked to provide the same information repeatedly. Cookies also allow us to make sure that only your browser can exchange information regarding your account with our servers. Cookies cannot be used to steal personal information or to gain access to information that you did not directly provide. The cookies we use are set when you log on to All Websites and are erased when you log off All websites or completely close your browser.

If you don't want cookies, you can set your browser to disable or refuse cookies or to alert you when cookies are being used. You should note, however, that various services might not function properly when cookies are not utilized.

### **Links**

All Websites host links to other sites or resources, and you may link to one of those sites or resources for a variety of purposes. These sites and resources have privacy policies that may differ from that of All websites, and for your protection, we recommend that you read and understand the privacy policy at any website prior to providing personal information on that website. GSFC is not responsible for the privacy practices or the content of any websites to which All Websites links or for the conduct of persons operating those websites.

### **HOW IS THIS INFORMATION PROTECTED?**

#### **Data Security**

GSFC has implemented numerous security measures to protect your personal information. Data sent to All Websites by you are collected using Secure Socket Layer (SSL) technology to ensure only GSFC receives your information. Special software programs monitor traffic on All Websites and will identify unauthorized attempts to upload or change information or cause damage to the website. These programs do not collect personally identifiable information, but they do collect information that enables GSFC to identify someone attempting to tamper with its website. However, we may automatically collect and store certain data from website visitors, for example, the name of the domain and host from which the visitor accessed the Internet, the Internet Protocol (IP) addresses of computers, the browser software used to access All Websites, the date and time the visitor accessed All Websites, and the Internet address of the website from which a visitor links directly to All Websites. We may also use HTML encoding to record aggregate information about the usage of All Website's and whether emails that we send have been accessed or acted upon.

#### **Restricted Access**

To protect your personal information from unauthorized access and use we restrict access to nonpublic personal information to those employees who need to know such information to provide products or services.

Except for the areas listed as an Exception to the Privacy Policy, personal identifiable data that you enter on All Websites are not made available or distributed to third parties, except with your express consent or at your express direction. In particular, All Websites will not give, sell or provide access to your personal information to any company, individual or organization for its use in marketing or commercial solicitation or for any other purpose, except with your express consent or at your direction, as is necessary for the operation of this site, or pursuant to one of the exceptions listed below.

**Children's Online Privacy Protection Act**

Consistent with the Children's Online Privacy Protection Act (COPPA), All Websites will not knowingly collect or retain information submitted by children under the age of 13. If GSFC learns that we unknowingly collected personally identifiable information from children under 13 years of age, we will immediately take all necessary measures to delete the information from our computer systems and other data systems that we own.

**EXCEPTIONS TO THE PRIVACY POLICY.**

There are limited exceptions to the All Websites privacy policy. When required by State law to comply with any valid legal process such as a search warrant, subpoena, statute, regulation, open records request, or court order, GSFC will supply such information contained in your All Websites account as GSFC reasonably determines, based on the advice of counsel, it is legally required to supply. In addition, GSFC may release specific information relevant to special cases, such as a physical threat to you or others or an attempted breach of security on All Websites.

**EUROPEAN UNION GENERAL DATA PROTECTION REGULATION ("GDPR") PRIVACY NOTICE.****Lawful Bases for Collecting and Processing of Personal Data**

GSFC is involved in providing services to students, including but not limited to, providing financial aid services and a college application portal. In order for GSFC to provide such services, it is essential and necessary for GSFC to have lawful bases to collect, process, use, and maintain data of students, employees, applicants, and others involved in its programs. The lawful bases include, without limitation, applications for financial aid and admission to postsecondary institutions, grades, communications, employment, program analysis for improvements, and records retention. Examples of data that GSFC may need to collect in connection with the lawful bases include but are not limited to: 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 GSFC's collection and processing of personal data will fall under the following categories:

- Processing is necessary for the purposes of the legitimate interests pursued by GSFC or third parties in providing its services to students.
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Processing is necessary for compliance with a legal obligation to which GSFC is subject.
- The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- 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**

GSFC receives personal data and special categories of sensitive personal data from multiple sources. Most often, this data comes directly from the data subject or under the direction of the data subject who has provided it to a third party (for example, application for admission to a postsecondary institution or a financial aid program application).

**Where GSFC gets Personal Data and Special Categories of Sensitive Personal Data**

GSFC receives personal data and special categories of sensitive personal data from multiple sources. Most often, this data comes directly from the data subject or under the direction of the data subject who has provided it to a third party (for example, application for admission to a postsecondary institution or a financial aid program).

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

Individual data subjects covered by the EU GDPR (<https://gdpr.eu/tag/gdpr/>) will be afforded the following rights:

- information about the controller collecting the data;
- the data protection officer contact information;
- the purposes and legal basis/legitimate interests of the data collection/processing;
- information about who received any personal data;
- if GSFC intends to transfer personal data to another country or international organization;
- the period the personal data will be stored;
- the existence of the right to access, rectify incorrect data or erase personal data, restrict or object to processing, and the right to data portability;
- the existence of the right to withdraw consent at any time;
- the right to lodge a complaint with a supervisory authority (established in the EU);
- why the personal data are required and possible consequences of the failure to provide the data
- the existence of automated decision-making, including profiling; and,
- if the collected data are going to be further processed for a purpose other than that for which it was collected.

Exercising any of these rights is a guarantee to be afforded a process and not the guarantee of an outcome. Any data subject who wishes to exercise any of the above-mentioned rights may do so by making such request at [bannino@gsfc.org](mailto:bannino@gsfc.org).

**Cookies**

Please see the description above of “cookies” within the Privacy Notice, which is incorporated herein by reference.

**Security of Personal Data subject to the EU GDPR**

All personal data and special categories of sensitive personal data collected or processed by GSFC must comply with applicable law and GSFC’s internal policies and procedures. Anyone suspecting that his or her sensitive personal data has been exposed to unauthorized access, report your suspicion to [bannino@gsfc.org](mailto:bannino@gsfc.org).

We will not share your information with third parties except as necessary to meet one of its lawful purposes, including but not limited to:

- its legitimate interest;
- contract compliance;
- pursuant to consent provided by you;

- as required by law;
- as necessary to protect GSFC's interests or public policy mission; and/or,
- with service providers acting on our behalf who have agreed to protect the confidentiality of the data.

### **Georgia Open Records Act**

As an entity of the government of the State of Georgia, the GSFC is subject to the provisions of the Georgia Open Records Act (ORA) except for those records that are exempt from disclosure under the ORA, the ORA provides that all citizens are entitled to view the records of state agencies on request and to make copies for a fee.

### **Data Retention**

GSFC and its institutions keep the data it collects for the time periods specified in the University System of Georgia Records Retention Schedules: [https://www.usg.edu/records\\_management/schedules/](https://www.usg.edu/records_management/schedules/).