

## WVU Extension Service Web Privacy Statement – Draft

### Statement Overview

The WVU Extension Service values your privacy the accuracy of your confidential personal information. To ensure your privacy, this policy defines and explains our online information collection and management practices and the choices you can make about the way your information is collected and used. To make this notice easy to find, the WVU Extension Service makes it available on our Homepage and at points where personally identifiable information may be requested.

### Definitions and Scope

WVU Extension Service Websites are defined as publicly accessible pages hosted under the domain “ext.wvu.edu and extension.wvu.edu,” any web address including “wvu.edu/~exten/,” or any Website, within the WVU IP address range, that is maintained by WVU Extension Service employees or departments or units, acting within their respective scopes of employment.

### Information Collection

When you access WVU Extension Service Websites, the following information is collected:

1. Information about your visit to and use of the Website;
2. Information about any inquiries, requests or transactions facilitated between you and the WVU Extension Service via the Website; and
3. Information that you knowingly and willing provide to the WVU Extension Service through e-mail and LISTSERV communications, form submissions, class and program registrations, survey responses, Weblogs, discussion forums and chat postings or Website subscriptions.

The WVU Extension Service and its Websites sites do not:

- a. Actively collect identifiable information such as your name, e-mail address, etc.; or
- b. Provide, rent or sell “identifiable information” to outside entities/third parties.

### Information Automatically Collected

WVU Extension Service Websites automatically collect general, anonymous information about your computer and your visits such as:

- The Internet Protocol (IP) address of your computer;
- Geographical location;
- Referral source;

- Date, time and length of visit;
- Number of views of pages, files, documents and links;
- Web-browser version;
- Operating System (OS) version;
- Screen resolution;
- Connection speed; and
- Language.

Information automatically collected is not a reflection of you as an individual.

When you view a WVU Extension Service Website, a small piece of data may be temporarily stored by your Web-browser. This information will be in the form of a cookie, a string of characters.

Most Web-browsers allow you delete and block cookies. (For example, Internet Explorer can allow you to refuse all cookies by selecting “Tools”, “Internet Options”, “Privacy”, and selecting “Block all cookies” using the sliding selector.) Blocking cookies will, however, have a negative impact upon the usability of many Websites, including WVU Extension Service Websites.

- More information on managing cookies with Internet Explorer  
(<http://www.microsoft.com/windows/ie/ie6/using/howto/privacy/config.mspx>)
- More information on managing cookies with Firefox  
([http://mozilla.gunnars.net/firefox\\_help\\_firefox\\_cookie\\_tutorial.html](http://mozilla.gunnars.net/firefox_help_firefox_cookie_tutorial.html))

### **Information You Provide**

The WVU Extension Service may use chat rooms, discussion forums, LISTSERVs, and Weblogs to enhance its Web-based communications. Any information disclosed therein may become public information and visitors should therefore exercise caution when deciding to disclose personal information in such places. Chat sessions and discussion forums may be logged.

Additionally, at any time there may numerous surveys being conducted via WVU Extension Service Websites. Persons responsible for conducting surveys that collect personally-identifiable information should clearly state at the survey site the extent to which any information provided will be shared or protected. Aggregate data from surveys may be shared with external third parties in ways that do not compromise privacy.

### **Information Usage**

Information automatically collected by the WVU Extension Service is used for the administration of its Websites as well as for marketing and reporting. The information is used to learn about the number of visitors and the types of technology visitors use to improve Website content, functionality, usability and performance. This information may also be used by the WVU Extension Service to personalize content. Information about individuals and their visits is not tracked or recorded.

Personal information transmitted through WVU Extension Service Websites will be used for the purposes specified in this privacy policy or in relevant parts of the Website.

In addition to uses identified elsewhere in this privacy policy, your personal information may be used to:

1. Facilitate your inquiries, requests, or transactions;
2. Improve browsing by personalizing your Website experience;
3. Send information to you that may be of interest to you by mail or by e-mail or similar technologies;
4. Send to you marketing communications relating to the WVU Extension Service that may be of interest to you by mail or, where you have specifically agreed to this, by e-mail or other technologies (if, at any time, you no longer desire marketing communications to be sent by the WVU Extension Service, please contact us at [Extension.Service@mail.wvu.edu](mailto:Extension.Service@mail.wvu.edu)); and
5. Provide other entities with statistical information about WVU Extension Service Website visitors as aggregate data, but no information will be used to identify any individual user.

## Information Sharing

As standard practice, the WVU Extension Service does not share Website visitor information with those outside of the University. In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this privacy policy, the WVU Extension Service may disclose information about you as:

1. Authorized and/or mandated by applicable federal, state and local laws;
2. Consistent with applicable federal, state and local regulations;
3. Permitted by governing University or WVU Extension Service policies;
4. Authorized by an approved University or WVU Extension Service contract;
5. In connection with any legal proceedings or prospective legal proceedings;
6. In order to establish, exercise or defend WVU Extension Service legal rights;
7. Clearly stated at a WVU Extension Service Website that such information will be shared and the visitor actively indicated informed consent by providing the information; and
8. Consent is otherwise given.

Except as otherwise provided in this privacy policy, no information about you will be transmitted to third parties.

## Data Security

Given the generally insecure nature of the World Wide Web, the WVU Extension Services takes reasonable precautions to prevent unauthorized access, maintain data accuracy, and ensure the correct use of personal

information collected online.

## Legal Compliance

### Youth Privacy

The WVU Extension Service is committed to youth and protecting their privacy by fully complying with the Children's Online Privacy Protection Act (COPPA) of 1998. For that reason, the WVU Extension Service will not knowingly collect or maintain personally identifiable information with respect to anyone under the age of thirteen without providing the parent with the information.

Visitors under the age of thirteen and their parents or guardians are otherwise cautioned that the collection of personal information volunteered by unauthorized children online or by e-mail will be treated the same as information given by an adult until the WVU Extension Service becomes aware that the user is under the age of thirteen and such information may be subject to public access.

In compliance with the Children's Online Privacy Protection Act, the WVU Extension Service will not require anyone under the age of thirteen to disclose more information than is reasonably necessary to participate in the activity as a condition of participation.

### Other Laws

Additionally, the WVU Extension Service is committed to complying fully with, among all other applicable federal and state privacy laws:

1. The Family Educational Rights and Privacy Act (FERPA) of 1974, which generally prohibits the release of student education records without student permission;
  2. The Health Insurance Portability and Accountability Act (HIPAA) of 1996, which generally safeguards the integrity and confidentiality of health information that is transmitted electronically;
  3. The Gramm-Leach-Bliley Act (GLB) of 1999, which generally safeguards nonpublic, personal information, in electronic or paper form, associated with customers of financial services and products; and
  4. The Freedom of Information Act (FOIA) in West Virginia. As a state entity, the WVU Extension Service may be legally required under the Freedom of Information Act or other laws to provide specific information, such as some electronic correspondence sent via WVU Extension Service Websites.
- More information about COPPA (<http://www.ftc.gov/ogc/coppa1.htm>)
  - More information about FERPA ([http://www.ed.gov/policy/gen/reg/ferpa/rights\\_pg4.html](http://www.ed.gov/policy/gen/reg/ferpa/rights_pg4.html))
  - More information about HIPAA (<http://www.hhs.gov/ocr/hipaa/>)
  - More information about GLB (<http://www.ftc.gov/privacy/privacyinitiatives/glbact.html>)

- More information about the FOIA in W.Va.  
(<http://www.legis.state.wv.us/WVCODE/29B/masterfrmFrm.htm>)

### **Third Party Websites**

WVU Extension Service Websites may include hypertext links to information created and maintained by third parties. These links are provided solely for your information and convenience. When you select a link to an outside Website and leave the University domain, you become subject to the privacy and security policies of the third party Website. The WVU Extension Service is not responsible for the privacy or security policies or practices of third party Websites.

### **Policy Changes**

The WVU Extension Service may update this privacy policy from time-to-time and notify visitors by posting a notice for a seven-day period of time on its Homepage. You should check this privacy policy occasionally to ensure you are comfortable with any changes that may have occurred since your last visit. Your continued use of WVU Extension Service Websites after any changes are posted will be considered acceptance of those changes.

If, in the future, the WVU Extension Service decides to use personally identifiable information in a manner different from that stated at the time it was collected, affected visitors will notified via e-mail. Users will have a choice as to whether or not their information in this different manner. Information will be used in accordance with the privacy policy under which the information was collected.

### **Comments/Questions**

The WVU Extension Service is a large organization with many people sharing responsibility for Website content. Please help us respond to your comments and inquiries by sending them to the appropriate department. If you have comments or questions about this privacy policy, or if you find WVU Extension Service Websites that do not adhere to this policy, please e-mail us at: [Extension.Service@mail.wvu.edu](mailto:Extension.Service@mail.wvu.edu). You may also write to:

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