

### **PRIVACY POLICY**

Thank you for visiting the Los Angeles Pacific University (LAPU) website. This statement discloses the privacy practices for the website and any related offline print and electronic publications. By using our site or one of our offline print or electronic publications, you agree to the collection, use and disclosure of your personal information as described in this statement. If you do not agree to the terms of this statement, then please do not use the site or such publications. BY USING THIS SITE, YOU AGREE TO OUR COLLECTION, USE AND MAINTENANCE OF YOUR INFORMATION IN THE UNITED STATES. If you are visiting the Site from a location outside of the United States, your connection will be through and to servers located in the United States. All information you provide will be processed and securely maintained in our web servers and internal systems located within the United States. If you have any questions regarding this Privacy Statement, please e-mail us at <a href="mailto:itoperations@lapu.edu">itoperations@lapu.edu</a> or send us mail at 300 N. Lone Hill Ave. #200, San Dimas, CA 91773.

Please read this privacy policy carefully.

## **Definitions and interpretation**

In this privacy policy, the following definitions are used:

Data	collectively all information that you submit to LAPU via the website. This definition incorporates, where applicable, the definitions provided in the Data Protection Act 1998;
Credit & Debit Card Data	We do not store credit card details nor do we share customer details with any 3rd parties;
Cookies	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies);
UK and EU Cookie Law	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;

User or you	any third party that accesses the Website and is not either (i) employed by LAPU and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to LAPU and accessing the Website in connection with the provision of such services; and
Website	the website that you are currently using, http://www.lapu.edu/, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

## **Collection of Information**

Our online and offline registration forms require users to give us contact information including name, e-mail address and postal address. We may also collect your telephone number, and other data. We use this contact information to send you information about the specific solutions or services that match your interests. We may also collect contact and other information from you if you: (1) participate in one of our contests or sweepstakes or apply for an offering from us; (2) order from us; (3) take part in one of our surveys; (4) contact us; or (5) otherwise voluntarily submit information to us, including in our online communities. You always have the ability to opt out of receiving future mailings and special offers; see the "Opt Out" section below. If you use any of our tell-a-friend features, we ask for your friend's name and e-mail address. We use this information only to send the communication you requested and to monitor the effectiveness of our tell-a-friend features. As part of the standard operation of the Site, we may collect certain nonpersonal information from you, including but not limited to your browser type, operating system, IP address and the domain name from which you accessed the Site. In addition, we may collect information about your browsing behavior, such as the date and time you visit the Site, the areas or pages of the Site that you visit, the amount of time you spend viewing the Site, the number of times you return to the Site and other click-stream data. We do not combine this non-personal information with your personal information. We use this information to: (1) provide you with customized content and advertising; (2) administer the Site, monitor its usage and diagnose problems with it; (3) remember you when you return to the Site, so that you don't have to re-submit information and preferences; and (4) conduct research to improve our content and services. In addition, we use software that uses your IP address to determine roughly where you are located, so that we can deliver advertisements to you, while you are on the Site, based on your location and therefore as relevant to you as possible. We use web beacons, which are tiny graphic images, in our e-mails. These help us measure the effectiveness of our e-mail campaigns, by telling us whether the messages have been received, opened or otherwise acted upon. We also work with a company that serves advertisements on our behalf. The company uses cookies, web beacons or similar technologies to collect anonymous information about your visits to the Site and other websites, so that we may serve you advertisements that are relevant to your interests. Our ad serving company does not collect personal

information about you, and we do not share any personal information with it. We will never share your IP address with a third party (except for our service providers) without first securing your express permission to do so.

All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see the clause below (**Security**).

### Cookies

- This Website may place and access certain Cookies on your computer. LAPU
  uses Cookies to improve your experience of using the Website and to improve
  our range of products and services. LAPU has carefully chosen these Cookies
  and has taken steps to ensure that your privacy is protected and respected at
  all times.
- 2. All Cookies used by this Website are used in accordance with current US, UK and EU Cookie Law.
- 3. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling LAPU to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.
- 4. This Website may place the following Cookies:

Type of Cookie	Purpose
Strictly necessary cookies	These are cookies that are required for the operation of our website. They include, for example, cookies that
	enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

- You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
- You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalization settings.
- It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

# Information Use

For purposes of the Data Protection Act 1998, LAPU is the "data controller". We will retain any Data you submit for 12 months.

We may use the information we collect from and about you for any of the following purposes: (1) to fulfill your requests for products and services; (2) to provide you with targeted offers, Site content and advertising on the Site; (3) to contact you with information and promotional materials and offers from our company as well as from our affiliates, other related companies, educational institutions, marketing partners and other third parties, if you have agreed to receive such communications; (4) to contact you when necessary; (5) to review Site and product usage and operations; (6) to address problems with the Site, our business or our products and services; and (7) to protect the security or integrity of the Site and our business.

### **Information Disclosure**

In addition to disclosing your information to our partners, with your consent, as described above, we may disclose the information collected from and about you as follows: (1) to our affiliated companies; (2) to our service providers, who may use it only on our behalf; (3) as necessary, if we believe that there has been a violation of our Site Terms of Use or of our rights or the rights of any third party; (4) to respond to judicial process and provide information to law enforcement agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law; and (5) as disclosed to you at the point of collection. In addition, if our company or substantially all of its assets are acquired, your personal information may be one of the transferred assets. Any personal information or content that you voluntarily upload or submit for posting to a Site (including your name and information in your blogs, a site community, bios, videos and comments) becomes publicly available and can be collected and used by others. It may also be available to third party search engines. It is in violation of the Site's Terms of Use for you to post any content that requests personally identifiable information. We may share aggregate, non-personally identifiable information about you with third parties for research and other purposes.

## **Opt Out**

Users who have opted in through our online and offline registration forms can opt out of receiving future communications from us. Users may also request removal directly from our partners at any time in the future. We make every effort to honor their request; however, we expressly disclaim responsibility for the actions of partners or other third parties beyond our control. To remove information from our database, users can email us at <a href="mailto:itoperations@lapu.edu">itoperations@lapu.edu</a> or contact us by mail at 300 N. Lone Hill Ave. #200, San Dimas, CA 91773. You may also use the opt-out mechanism that is contained in each email.

#### Access

You have the right to ask for a copy of any of your personal Data held by LAPU. To access, correct or request that we make no further use of your personal information, please send us an e-mail <a href="mailto:itoperations@lapu.edu">itoperations@lapu.edu</a> or contact us by mail at 300 N. Lone Hill Ave. #200, San Dimas, CA 91773.

# **Controlling use of your Data**

Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:

- 1. use of Data for direct marketing purposes; and
- 2. sharing Data with third parties.

## **Functionality of the Website**

- 1. To use all features and functions available on the Website, you may be required to submit certain Data.
- 2. You may restrict your internet browser's use of Cookies. For more information see the clause below (**Cookies**).

# Third party websites and services

LAPU may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. The providers of such services have access to certain personal Data provided by Users of this Website.

Any Data used by such parties is used only to the extent required by them to perform the services that we request. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties will be processed within the terms of this privacy policy and in accordance with the Data Protection Act 1998.

### Links to other websites

This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

# Changes of business ownership and control

LAPU may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of LAPU. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us. We may also disclose Data to a prospective purchaser of our business or any part of it.

In the above instances, we will take steps with the aim of ensuring your privacy is protected.

## Security

LAPU has taken certain physical, electronic, contractual and managerial steps to safeguard and secure your personal information. It is your responsibility to maintain the confidentiality of your Site account information, including your password, and you are responsible for all use of the Site accessed through it. You agree to notify us immediately of any unauthorized use of your account or any other actual or suspected breach of Site security. You may report suspected violations to the Webmaster at the address listed above.

#### Children

We do not direct the Site to, nor do we knowingly collect any personal information from, children under thirteen.

## General

- 1. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
- If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
- 3. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
- 4. This privacy policy is governed by and interpreted according to the laws of the United States of America. All disputes arising under this privacy policy are subject to the jurisdiction of the courts of the United States of America.

# **Changes to this Privacy Statement**

Please note that we review our Privacy Statement from time to time, and that our practices are subject to change. We ask that you bookmark and periodically review

this page to ensure continuing familiarity with the most current version of our Privacy Policy. All amended terms shall be automatically effective after they are posted on the Site and applied retroactively if you use the Site after this Policy is amended.

# **Contact Us**

If you have any questions about this Privacy Statement, the practices of the Site, or dealings with the Site or with us, contact:

Los Angeles Pacific University Attn: Director of I.T. 300 N. Lone Hill Ave. #200 San Dimas, CA 91773 (626) 624-4673 itoperations@lapu.edu