

# Privacy Policy

## **Kettering GlobalX Privacy Policy**

Effective Date: July 15, 2020

If you reside in the United States the personal data provided to, or collected by, our Services is controlled by Kettering University 1700 University Ave, Flint, MI 48504. **If you have any concern about providing information to us or having such information used in any manner permitted in this Privacy Policy, you should not visit our websites, apps or otherwise use our Services.**

This Privacy Policy describes the types of information we may collect from you or that you may provide to us when you visit or use our services (collectively the "Services") at the Kettering University, Kettering University Online or Kettering GlobalX (the "Websites") or desktop application and our practices for collecting, using, maintaining, protecting and disclosing such information. This Privacy Policy applies to information we collect: (i) through our Services, and (ii) in text and electronic messages between you and our Services.

By accessing or using our Services, you agree to this Privacy Policy.

IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT ACCESS OR USE OUR SERVICES.

### **1. INFORMATION WE COLLECT ABOUT YOU**

We collect several types of information about visitors and/or users of our Services. We may collect this information either directly when you provide it to us or automatically as you navigate through the Websites or App.

(a) We will collect and process your personal data when you register for a Service/create an account, subscribe to a newsletter, submit feedback, enter a contest, fill out a survey, or send us a communication. When ordering products or services on the Websites or App, you may also be asked to provide a credit card number and other payment-related information. Depending upon the activity, some of the information we ask you to provide is required to use the Services (e.g. registering an account) and some is voluntary. If you do not provide data when needed for a particular activity, you will not be able to engage in that activity.

We also collect your Internet Protocol ("IP") address. We use your IP address to diagnose problems with our servers and/or software, to administer our Services, and to gather demographic information.

(b) We may collect certain information that does not by itself identify a specific individual. Such information tells us about your equipment, browsing actions, and the resources that you access and use through the Services, such as your operating system and browser type.

(c) When you download our App and use our Services, we automatically collect information on the type of device you use and the operating system version, so we know the best version of the application to provide you. We do not ask you for, access, or track any location-based information from your mobile device at any time while downloading or using our App or Services.

(d) When you contact us for customer support we may collect additional information to resolve your issue.

## **2. WHERE WE STORE DATA**

By submitting your personal data, you agree to the transfer, storing and processing of your data outside of the country where you reside. We will take reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

## **3. HOW WE USE YOUR INFORMATION**

We use information held about you in the following ways:

- To present content from our Services in an effective manner for you and for your computer or mobile device
- To provide you with information, products or services that you request from us or which we feel may interest you
- To carry out our obligations arising from any contracts entered into between you and us, including for billing and collection
- If you pay for Services using a credit card, we will transmit your credit card data to the appropriate credit card company and/or credit card payment processing company
- To allow you to participate in interactive features of our Services, when you choose to do so
- To contact you about our Services
- In any other way we may describe when you provide the information or when we prompt you regarding a new use of information about you.

## **4. DISCLOSURE OF YOUR INFORMATION**

We will share your personal data with third parties only in the ways that are described in this Privacy Policy. We do not sell, trade, rent or disclose your information to others, except as provided herein:

(a) We provide and support some of our Services through contractual arrangements with service providers and other third parties. We and our service providers use your personal data to operate our Websites and to deliver Services. For example, we must release your credit card information to the card-issuing bank to confirm payment for products and services purchased on our Websites; and provide order information to third parties that help us deliver the Services.

(b) We will also disclose personal data in the following circumstances: (i) if it is required by law enforcement or judicial authorities, or to cooperate with a law enforcement investigation; (ii) if we have a good faith belief that we are required or permitted to do so by law or legal process; (iii) to protect our rights, reputation, property or the safety of us or others; (iv) to defend or enforce our rights or your obligations; (v) if the disclosure is required by mandatory professional standards; (vi) to a third party with your prior consent to do so; or (vii) if we are under a duty to disclose or share your personal data in order to enforce or apply any contracts or agreement that may exist between you and us including this Privacy Policy.

## **5. LAWFUL BASES FOR PROCESSING**

We will only collect and process personal data about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g., to deliver the Services you have requested) and “legitimate interests.”

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. To do so please contact in writing [KetteringGlobalX@kettering.edu](mailto:KetteringGlobalX@kettering.edu)

## **6. INFORMATION RELATED TO DATA COLLECTED THROUGH KETTERING GLOBALX**

For certain services, we collect information under the direction of our clients (e.g., an entity that subscribes to the Services for use by the entity’s personnel). In this respect, we act as a data processor under applicable laws. We will retain and use this personal data as necessary to comply with our legal obligations, resolve disputes, and fulfill our obligations under those agreements with the data controllers. In these cases, the data controller will have its own privacy policy that applies to your data, including personal data. We encourage you to read their privacy policies to learn more about their data practices.

## **7. DATA SECURITY**

Access by you to your account is available through a password and/or unique username selected by you. This password is encrypted. We recommend that you do not divulge your password to anyone, that you change your password often using a combination of letters and numbers, and that you ensure you use a secure web browser. We cannot be held accountable for activity that results from your own neglect to safeguard the secrecy of your password and username. If you share a computer with anyone, you should always log out

of your account after you are finished in order to prevent access to your information from subsequent users of that computer.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal data, you acknowledge that: (a) there are security and privacy limitations of the Internet which are beyond our control; (b) the security, integrity and privacy of any and all information and data exchanged between you and us through this Website cannot be guaranteed and we shall have no liability to you or any third party for loss, misuse, disclosure or alteration of such information; and (c) any such information and data may be viewed or tampered with in transit by a third party.

In the unlikely event that we believe that the security of your personal data in our control may have been compromised, we will try to notify you. To the extent you have provided us with your email address, we may notify you by email and you agree to our use of email as a means of such notification.

## **8. COOKIES AND OTHER TECHNOLOGIES**

When you use our Websites we may use cookies and other technologies in order to facilitate and customize your use of our Services.

## **9. MOBILE ANALYTICS**

We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you use the App, the events that occur within the App, aggregated usage, performance data, and where the App was downloaded from. We do not link the information we store within the analytics software to any personal data you submit within the App.

## **10. DIRECT MARKETING**

We currently do not share personal data with third parties for their direct marketing purposes without your permission.

## **11. CHANGES TO THIS PRIVACY POLICY**

It is our policy to post any changes we make to our Privacy Policy on this page (with a notice that the Privacy Policy has been updated on the Websites). The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Websites and this Privacy Policy to check for any changes.

Your continued use of the Services after such modifications will constitute your agreement to the updated terms of the modified Privacy Policy.

## **15. HOW DO YOU CONTACT US WITH QUESTIONS?**

If you have questions or complaints regarding this Privacy Policy, please first contact [KetteringGlobalX@kettering.edu](mailto:KetteringGlobalX@kettering.edu) for [Customer Support](#) online. You can also reach us by physical mail at the addresses below.

### **If you are in the United States:**

**Kettering University DBA Kettering GlobalX Attn: VP Kettering Global 1700 University Ave Flint, MI 48504**

For California residents, additional disclosures required by California law may be found at the Office of Attorney General of California: <https://oag.ca.gov/privacy/ccp...>

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