

## General Data Protection Regulation (GDPR) Notice

Effective Date: March 25, 2018

Updated: July 2, 2018

Hannibal-LaGrange University (HLGU) recognizes the importance of the privacy of students, their data, and important information. As outlined in the [Student Handbook](#), one of the purposes of HLGU is “To regard all persons as beings created in God’s image and therefore equal in value and worthy of respect.” In light of this purpose, and in response to the General Data Privacy Regulations as set forth by the European Union and Switzerland, this notice will serve as a statement of how HLGU secures, protects, and practices data security.

HLGU adheres to the policies and practices as set forth by the Family Educational Rights and Privacy Act ([FERPA](#)). While this policy deals mainly with educational records, the FERPA policy also specifies specific areas of identification information. As outlined in the policy, students have:

*The right to consent to disclosures of personally identifiable information contained in the student’s education records, except to the extent that FERPA authorizes disclosure without consent. One exception which permits disclosure without consent is disclosure to school officials with legitimate educational interests. A school official is a person employed by HLGU in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom HLGU has contracted (such as an attorney, auditor, or collection agent); a person serving on the Board of Trustees; or a student serving on an official committee, such as a disciplinary or appeals committee, or assisting another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility.*

This notice will discuss:

- How information is collected
- What information is collected
- How information is used
- Processing of information/Who has access to information
- Sharing information
- Information changes/Data maintenance
- How long data is kept
- Protecting information

### **How and Information is collected**

Hannibal-LaGrange University is collected through purchasing of data from [ACT](#), [SAT](#), National Research Center for College and University Admissions ([NRCCUA](#)), College Bound Selection Service ([CBSS](#)), and

[Christian Connector](#). The transfer of this data follows secure channels and is entered by the Office of Admissions.

Other information is obtained directly through individual submission (i.e. application, request for information, email/text updates). All information gathered through these channels are obtained by user submission and are correct only as they are entered by the user and submitted voluntarily.

### **What Information is Collected**

HLGU will require the following information from students:

- Name and biographical information (including race, nation of origin, and religion)
- Information about educational history
- Health information (health and medical conditions and specific dietary requirements)
- Financial information (Tuition, fees, donations, scholarships, etc.)
- Familial relationships
- Activities and university involvements, such as athletics, clubs, and organizations
- Photographs from university events and security footage
- Records of facility usage, including dormitory entrances

### **How Information is Used**

Student data is used in the following areas:

- Recruitment
  - Athletic and general education recruitment
- Academics
  - Registration
  - Attendance
  - Grading
  - Prerequisite qualifications
  - Internships
  - Tutoring and advising
  - Institutional evaluations, surveys, and accreditation reviews
- Public safety
  - Parking
  - Criminal investigations, on- or off-campus
  - General security of students
- Athletics
  - NAIA eligibility
  - Sport participation
  - Athletic Scholarships (Grant in Aid forms)
  - Team rosters
- Alumni services

- Donor list
- Graduation/Commencement activities
- Business office
  - Tuition payments/arrangements
  - Scholarships
  - Financial aid
- International Students
  - Completion of I-20
  - SEVIS documentation
  - OPT and CPT form completion
- General campus uses
  - Promotional materials
  - Event attendance
  - IT requirements
  - Social media
  - Third party contractors
  - Institutional research
  - Disciplinary issues, grievances, complaints
  - Other uses as required for student general attendance

### **Processing of Information/Who Has Access to Information**

All employees of the institution who would have access to student data are permitted to do so only as required to complete office or institutional tasks. Employees who have access to such information adhere to the FERPA requirements for data protection.

### **Sharing Information**

HLGU reserves the right to share information that is considered by FERPA to be directory information, or “Information contained in the educational records of a student that would not generally be considered harmful or an invasion of privacy if disclosed. Typically, ‘directory information’ includes information such as name, address, telephone listing, date and place of birth, participation in officially recognized activities and sports, and dates of attendance. A school may disclose ‘directory information’ to third parties without consent if it has given public notice of the types of information which it has designated as ‘directory information,’ the parent’s or eligible student’s rights to restrict the disclosure of such information, and the period of time within which a parent or eligible student has to notify the school in writing that he or she does not want any or all of those types of information designated as ‘directory information.’ (US Department of Education, Frequently Asked Questions, <https://www2.ed.gov/policy/gen/guid/fpco/faq.html>)

### **Information Changes/Data Maintenance**

Should students need to make a change to their information (i.e. phone number, address, name due to marriage), the Office of the Registrar will assist in making any changes. Any changes that must be made

regarding student information must be in writing in the form of a Change of Address form, available on the HLGU [website](#) and in the Office of the Registrar.