



PRIVACY POLICY

Type: University

Category: Information Technology

Administrators: Vice President for Finance and Administration

Manager: Director of Instructional and Information Technology

Purpose

To establish Viterbo University's commitment to safeguarding personal data collected through institutional services and systems. It outlines principles for responsible data use, access, and security in alignment with the university's core values of service, integrity, and stewardship.

Scope

This policy applies to Viterbo University employees, students, contractors, and visitors.

Definitions

In alignment with our core values of service, integrity, and stewardship, we store data collected as part of our Viterbo website/mobile app services, admissions, advising, bookstore, business operations, financial aid administration, course engagement, employment, and health and counseling services as a secure and valuable resource. Viterbo utilizes data to serve our students and employees in their successful engagement, retention, and to move towards the understood goals.

Data we collect:

- Collected directly from the data subjects from application for admission/employment, business, course and housing operations system interactions
- Collected automatically (e.g., through cookies or trackers)
- Collected from third parties (e.g., background checks, recommendation letters)

How we use data:

- Data is used in the aggregate to understand patterns for success or engagement with university services or website effectiveness.
- Data is used in an identifiable form for use in targeted information.
- Data is used in personally identifiable form for use by specific individuals assigned a personal role/relationship with that person's information.

How we secure data:

- Data Governance Committee, with the Colleague Steering Group, oversees data access, transportability, and use.
- Data elements/systems have assigned data stewards



- Data integrated with auxiliary systems outside of our system of record is transported with secured APIs (Application Programming Interface) and or SFTP.
- Data access is defined by role. Role membership is defined by institutional job description. Authentication for access to data is required.
- Data access is secured based on organizational roles.

DISCLAIMER

Viterbo University will not share, sell, rent, or authorize any third party to use your directory information for commercial purposes.

Related Resources

- [Family Educational Rights and Privacy Act \(FERPA\) Viterbo Policy](#)
- [Records Retention Schedule](#).