



PRIVACY POLICY

Type: University

Category: Information Technology

Administrators: Vice President for Finance and Administration

Manager: Director of Instructional and Information Technology

Purpose

Viterbo University is committed to operating with integrity and promoting ethical and responsible use of data. The purpose of this policy is to define various types of data collection that the institution conducts and our use of this collected data.

Scope

This policy applies to Viterbo University prospective students, enrolled students, employees, and website 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

Revised: 3/14/2023

Reviewed: 10/2025



- 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.

Related Resources

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