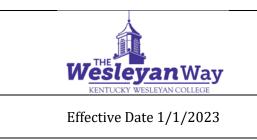


Procedure: Security Awareness Program Plan	
<b>Issue Date:</b> 1/1/2023	Revision Date: 1/1/2023
Revision Number: 1.1	NIST Control: AT
<b>Owner:</b> Director of Information Technology	

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# 1. Kentucky Wesleyan College Privacy Statement

Your privacy is important to us. This privacy statement explains what personal data Kentucky Wesleyan College collects from you, through our interactions with you and through our products, and how we use that data.

Our Privacy Policy explains:

- What information we collect and why we collect it;
- How we use that information; and
- The choices we offer, including how to access and update information.

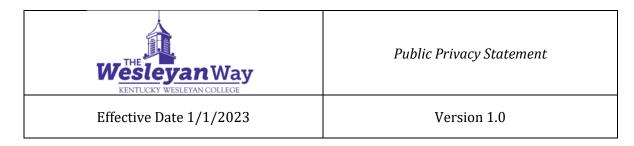
## 2. Who To Contact

Kentucky Wesleyan College is a Higher Education institution headquartered in Kentucky, United States. Details of our locations can be found on our website.

## 3. Personal Data We Collect

Kentucky Wesleyan College collects data to operate effectively and provide you the best experiences. We are provided this data by our clients. We get some of it by recording how you interact with our ads, for example, using technologies like cookies, and receiving error reports or usage data. We also obtain data from third parties.

- First Name and Last Name
- Phone Number
- Email Address
- Country
- Device Information such as your hardware, operating version, etc.
- IP Address
- Data regarding page visits and when they were accessed



## 4. How We Use Personal Data

Kentucky Wesleyan College uses the data we collect to operate our business and provide you the products and services we and our business partners offer, which includes using data to improve the products and personalize your experiences. We also may use the data to communicate with you, for example, informing you about product information and to help show more relevant ads offered by our clients or other third parties.

## 5. Sharing Personal Information

Third parties working on our behalf: We may pass your personal data to third parties, such as service providers, agents, subcontractors and other associated organizations, for the purposes of completing tasks and providing services to you on our behalf. When we use third parties, we disclose only the personal data that is necessary to deliver the service, and only if we have a contract in place between us and the third party that requires them to keep your personal data secure and to not use it for their own direct marketing purposes.

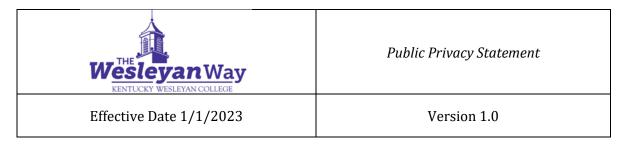
**Our clients:** We will not share your personal data with our clients unless you have given us explicit consent to do so for that specific purpose.

**Third parties and our clients:** We may share personal data with companies, organizations or individuals outside of Kentucky Wesleyan College if we have a good-faith belief that access, use, preservation or disclosure of your personal data is reasonably necessary to:

- Meet any applicable law, regulation, legal process or enforceable governmental request,
- Enforce applicable Terms of Service, including investigation of potential violations,
- Detect, prevent, or otherwise address fraud, security or technical issues, or
- Protect against harm to the rights, property or safety of Kentucky Wesleyan College, our users or the public as required or permitted by law.

Mergers, acquisitions or any other structural changes to Kentucky Wesleyan College may also require us to transfer your personal data to another entity, provided that the receiving entity will comply with this privacy notice.

Kentucky Wesleyan College does not share Personal Data with any third parties, without legal reasons.



## 6. How to Access & Control Your Personal Data

We aim to provide you with access to your personal information. If that information is innaccurate, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes.

## 7. Cookies & Similar Technologies

Kentucky Wesleyan College uses cookies (small text files placed on your device) and similar technologies to provide our websites and online services and to help collect data. Cookies allow us, among other things, to:

- Store your preferences and settings;
- Provide interest-based advertising; and
- Analyze how our websites and online services are performing.

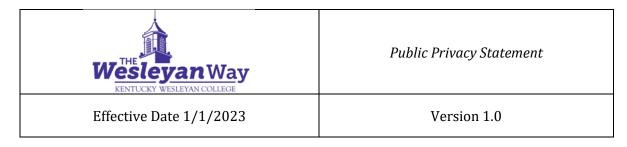
We also use web beacons to help deliver cookies and gather usage and performance data. Our websites may include web beacons and cookies from third-party service providers.

You have a variety of tools to control cookies, web beacons and similar technologies, including browser controls to block and delete cookies and controls from some third-party analytics service providers to opt out of data collection through web beacons and similar technologies. Your browser and other choices may impact your experiences with our products.

## 8. Changing or Removing Personal Data

#### 9. Data Retention

Kentucky Wesleyan College will retain your personal data as needed to fulfill the purposes for which it was collected. We will retain and use your personal data as necessary to comply with our business requirements, legal obligations, resolve disputes, protect our assets, and enforce our agreements. Once retention of personal information is no longer necessary, it will be destroyed in accordance with Kentucky Wesleyan College's Information Classification and Handling Procedures.



# 10. Transfer of Personal Data to Other Countries

Personal data that Kentucky Wesleyan College collects is primarily hosted in the United States, therefore most personal data, if it will be transferring out of the originating country, will be transferred to the United States.

## 11. Personal Data for Children Under 16

Our sites are not geared toward children under 16. Our sites will not knowingly collect personal data from anyone under 16 years old. Please contact if you believe that your child under 16 has accessed our sites.

## 12. California Specific Notice

If you are a California resident, California Civil Code Section 1798.83 permits you to request in writing a list of the categories of personal data related to our disclosure of certain categories of personal data in the preceding year to a third party for their direct marketing purposes.

## 13. Dispute Resolution

If you have any concerns about the way we process your personal data, you are welcome to contact our privacy team or write to us at:

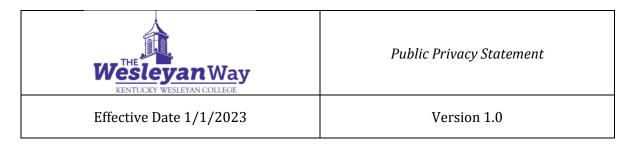
Kentucky Wesleyan College Headquarters Attn: Privacy Officer 3000 Frederica Street Owensboro, KY 42301

## 14. Questions and Contact

Any questions regarding this Privacy Notice and our privacy practices should be sent via mail.

## 15. Changes to the Privacy Public Notice

Our privacy policies are under regular review and changes to our Privacy Public Notice are posted on this web page.



## 16. Date

This privacy notice was last updated on 01/01/2023.