

# **Student Privacy Policy**

SUMMA University website is owned and operated by SUMMA UNIVERSITY ("Summa"). This Privacy Policy governs the manner in which Summa collects, uses, maintains, and discloses information collected from students and users (hereinafter collectively "Users") of the Summa website ("Site") at www.summauniversity.us. This privacy policy applies to the Site and all products and services offered by Summa.

By accepting the Privacy Policy, you are consenting to our collection, use and disclosure or your personal information in accordance with our Privacy Policy. If you have any questions relating to this Privacy Policy, please contact us. More information on how to contact us is described below.

## **Privacy Protection**

The information obtained from Users interested in obtaining an education from our university shall remain confidential. Under no circumstances does Summa divulge any information about individual Users to a third party or third parties.

Summa is committed to adhering to the Privacy Protection Principles and is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). Information on the Privacy Protections imposed can be located https://www.privacyshield.gov

#### What Information do We Collect?

Summa values and respects your privacy. We believe in transparency and want our Users to be familiar with how we collect, use and disclose information in our Site. This Privacy Policy describes our practices in connection with information that we collect in our Site owned and controlled by Summa, for which you are accessing this Privacy

## Policy.

Our Privacy Policy applies to the use of your personal information by Summa through Users' browsing or use of its Site. The information published within is limited to the use of personal information by Summa's Site.

Summa's inquiry forms require Users to provide personal contact information such as their name, mailing address, telephone number, and e-mail address (hereinafter collectively "Personal Information"). Our institution utilizes this information for purposes of providing Users with additional information about our university, whether by direct contact or mailings, and to resolve any issues experienced by our Users on our Site. Users may opt out of receiving future mailings or other communications from Summa at any time. By providing Personal Information to us, you agree to the terms and conditions of this Privacy Policy.

Users' information may be used to resolve issues experienced while navigating our Site, such as:

- Respond to User inquiries and fulfill User requests.
- Send information we believe may be of interest to you, such as advising you of updates on the Site or to inform you of upcoming events, and educational materials.
- Send important information regarding Summa's changes to terms, conditions, and policies and/or other administrative information.
- Send marketing, promotional, or other similar information which we believe may be of interest to you.
- Diagnose Site technical problems or bugs.
- Use as believed to be necessary (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our

affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

In addition, Summa may share your information (including Personal Information and Non-Personal Information) with third parties in certain circumstances, for example, where it believes such sharing is (1) reasonably necessary to providing you with a requested service, (2) legally required, or (3) permitted by this Privacy Policy or otherwise by you.

For example, we may share your information (including Personal Information and Non-Personal Information) with our affiliates, technical consultants, service providers, third party auditors, third party partners or other third parties. We aim to implement reasonable and appropriate contractual and technical protections for limiting third-party use of your information to legitimate business activities.

We may also disclose non-personally identifying information regarding our users and user behavior as a measure of interest in, and use of, our Services to third parties, including, for example, aggregate data, such as overall patterns or demographic reports that do not describe or identify any individual user.

Summa automatically receives and records information from your browser or mobile device when you visit the Site. This information is necessary given our interest in providing and improving the functionalities of the Summa Site and to enabling us to comply with legal obligations.

#### **User information:**

Summa collects information about your interactions with the Site, such as the pages or content you view, searches you make, and other actions on the Site.

#### Log data and device information:

We automatically collect certain technical and device information when you access and use the Site, even if you have not yet created a personal ID and password. That information includes, among other things: details about how you have used the Site (including if you clicked on links to third party applications), IP address, access dates and times, specific hardware and software information, device information, unique identifiers, crash data, cookie data, and the pages you have viewed or engaged with before or after using the Site.

#### Analytics:

We use data analytics to ensure site functionality and improve Summa's Site. We use mobile analytics software to allow us to understand the functionality of the applications on your phone. This software may record information such as how often you use the applications, what happens within the applications, aggregated usage, performance data, app errors and debugging information, and where the applications were downloaded from.

# Cookies and similar technologies:

Along with your IP address, we use cookies and similar technologies regarding which pages you visit on our Site, information about which page led you to our site, and the software you use to visit our site. We may automatically collect device- specific information when you install, access, or use our website or applications. This information may include information such as the hardware model, operating system information, app version, app usage, debugging information, browser information, and unique device identifiers.

## Payment transaction information:

We collect information related to your payment transactions through the Summa Site, including the payment instrument used, date and time, payment amount, payment instrument expiration date and billing postcode, PayPal email address, your address, and other related transaction details. This information is necessary to allow the provision of payment services.

Last, we may disclose Personal Information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

#### Choice/Opt-Out

Our Site provides Users with the opportunity to opt-out of receiving future communications from Summa and its partners upon Summa's request for information from the User.

Users may have their Personal Information removed for purposes of future communications by submitting their request in any of the following manners:

- Via email to itsupport@summauniversity.us; or
- Via telephone by contacting (786) 477-6455; or
- Via mail correspondence by sending a request to:
  Summa University, 8400 NW 36th St #450, Doral, FL 33166, EE. UU.

Summa will try to comply with User request(s) as soon as reasonably practicable. If you opt out of receiving marketing-related messages from us, we may still send you important administrative messages.

#### <u>Disclaimer</u>

Summa's Site provides information on various topics. While our staff strives to provide accurate information to our Users, we cannot guarantee the 100% accuracy or reliability of the Site's content.

This Site provides links to sites of other entities solely as a convenience to our Users.

Summa does not endorse these companies nor are we responsible for the privacy practices or the content of such web sites.

# EU General Data Protection Regulation (GDPR)

As of May 25, 2018, Summa complies with the EU General Data Protection Regulation (GDPR). For more information on the GDPR and its requirements, please visit https://www.eugdpr.org

## **Data Processing**

Any personal information collected about EU visitors via our Site is processed in the United States by Summa. When you provide personal information to Summa, you consent to the processing of your information in the United States. Our Site is hosted in the United States.

#### Security

Summa employs industry standard security measures to ensure the security of information and to best protect and prevent the loss, misuse, and alteration of the information within our control. However, the security of information transmitted through the Internet can never be guaranteed. Summa is not responsible for any interception or interruption of any communications through the Internet or for changes to or losses of information. Users of our Site are responsible for maintaining the security of any password, user ID, or other form of authentication involved in obtaining access to password protected or secure areas of any Summa websites. In order to protect you and your information, Summa may suspend your use of our Site, without notice, pending an investigation, if any breach of security is suspected. Access to and use of password protected and/or secure area of our Site is restricted to authorized Users only. Unauthorized access to such areas is prohibited and may lead to criminal prosecution. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the "Contacting Us" section herein.

# Accessing, Changing, or Suppressing Your Information

If you would like to review, correct, update, suppress, delete or otherwise limit our use of your Personal Information that has been previously provided to us, you may contact us by any method most convenient to you and in accordance with the "Contacting Us" section herein.

In your request, please specify what information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. We will try to comply with your request as soon as reasonably possible.

# Withdrawing Consent and Restriction of Processing Information

Where you have provided your consent to the processing of your personal information by Summa you may withdraw your consent at any time by changing your account settings or by sending a communication to Summa specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.

Additionally, in some jurisdictions, applicable law may give you the right to limit the ways in which we use your personal information, in particular where:

- You contest the accuracy of your personal information.
- The processing is unlawful and you oppose the erasure of your personal information.
- We no longer need your personal information for the purposes of the processing, but you require the information for the establishment, exercise, or defense of legal claims.

### Retention Period

Summa will retain your Personal Information for the period necessary to fulfill the

purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law.

## Use of Site by Minors

The Site is not directed to individuals under the age of thirteen (13), and we request that these individuals not provide Personal Information through the Site.

## Sensitive Information

Summa requests that Users refrain from sending or disclosing any sensitive personal information (including Social Security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership) on or through the Site or otherwise to us.

## Updates to This Privacy Policy

This Privacy Policy may be subject to updates. The "LAST UPDATED" legend at the top of this page indicates when this Privacy Policy was last revised. We encourage you to periodically review this Privacy Statement for any changes. Your use of the Site following these changes means that you accept the revised Privacy Policy. For new Users, changes or updates are effective upon posting. For existing Users, changes or updates are effective 30 days after posting.

#### Acceptance of these Terms

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

## Contacting Us

If you have any questions about this Privacy Policy, or if you have a complaint, access request or any other issue, please contact us at:

Summa University 8400 NW 36th St #450 Doral, FL 33166, EE. UU. itsupport@summauniversity.us (786)477-6455