
Subject: Policy on Privacy Statements on Virginia Tech Websites

1. Purpose 1

2. Policy 1

 2.1 General Statement..... 1

 2.2 Privacy Statements..... 1

 2.2.1 Notice..... 2

 2.2.2 Access 2

 2.2.3 Security 2

 2.2.4 Individual Access and Control..... 2

 2.2.5 Children's Online Privacy Protection Act (COPPA) Information 2

 2.2.6 Research on Human Subjects 2

 2.2.7 Additional Required Notices 2

3. Procedures..... 2

4. Definitions 3

5. References..... 3

6. Approval and Revisions..... 3

1. Purpose

This policy sets forth the required communications to developers and consumers of Virginia Tech websites regarding the privacy of any information collected by the website.

2. Policy

This policy applies to Virginia Tech websites, as defined in section 4 below. Related university policies and standards that also apply include Virginia Tech's Standard for Securing Web Technology Resources (https://it.vt.edu/content/dam/it_vt_edu/policies/StandardForSecuringWebTechnologyResources-3-29-10-Signed.pdf).

2.1 General Statement

The general stance on privacy of Virginia Tech websites is that no data is collected except in cases where it fulfills a specific purpose that:

1. is required for the business operations of the university, including research, teaching, engagement, administration, and management;
2. provides or improves desired service to the user;
3. protects the security and integrity of the data; or,
4. protects the security and integrity of the website itself and related network and computing resources.

2.2 Privacy Statements

Virginia Tech websites shall post a link to the privacy statement (<https://vt.edu/about/privacy.html>) on each site if no special conditions apply; otherwise, the privacy statement must be posted with modifications to include information regarding specific conditions as specified, below. At a minimum, a link to the privacy statement will be posted on (1)

the main page for each distinct server domain name; (2) pages likely to be browsed directly; and, (3) any page that collects personal information. The privacy statement must address the following issues, as applicable.

2.2.1 Notice

The statement should note what data is collected, the primary purpose of the data and whether there are any subsidiary purposes of the data, and how the data will be stored.

Notice of data collected should include voluntary data collected by the website, if any. In most cases, the web form is self-documenting with regard to collecting data voluntarily provided by the site. Notice of data collected should also comment as to whether cookies, modified URLs, embedded or hidden text, or other data collection mechanisms used to assist in maintaining state (i.e., persistence of information between pages or transactions) are being used.

2.2.2 Access

The statement should note who will have access to the data.

2.2.3 Security

The statement should note how the data will be kept secure.

2.2.4 Individual Access and Control

If applicable, the statement should include information on how the user may review and/or request corrections to their data, and how the user may give consent to uses of the data.

2.2.5 Children's Online Privacy Protection Act (COPPA) Information

If the site is directed toward children under 13 years of age (12 years old and younger), the statement should include information on how protections guaranteed under COPPA are being provided.

2.2.6 Research on Human Subjects

When research involves humans as research subjects, approval from the Institutional Review Board for Research Involving Human Subjects (IRB) must be in place. Examples are surveys, interviews, observations of activities or behaviors, exercise tests, blood collections, psychological or medical measurements or intervention, and sensory responses to taste, smell, etc. Any research involving responses from people or access to records about people must have a review. When websites are used to recruit research subjects or to collect information, a description of the privacy statements should be a part of the protocol review by the IRB.

2.2.7 Additional Required Notices

Each university website will carry the statement, "Virginia Tech complies with all statutory and legal requirements with respect to access to information." In addition, each privacy statement will remind users that privacy concerns vary with website purposes, and that Virginia Tech does not control the privacy of pages outside of Virginia Tech that may be linked to university pages. Each website should also post a contact email address so that site visitors may relay any privacy concerns.

3. Procedures

Virginia Tech managers of websites are responsible for posting the privacy information. They may do so by using a hyperlink on the text "privacy" at the bottom of their webpage, linking to the Virginia Tech Privacy Statement at <https://vt.edu/about/privacy.html> if no special conditions apply regarding data that is collected. For an example of a more custom privacy statement, the Division of Student Affairs' statement may be helpful (<http://www.dsa.vt.edu/privacy/gobblerconnect.php>).

4. Definitions

Virginia Tech websites refers to online pages maintained by or under the direction of the university or its departments and other organizational units.

Data vs. Information: Computers use data; humans use information. Data is a building block which, when used in combination and given meaning and context, becomes information.

5. References

Virginia Tech Privacy Statement

<https://vt.edu/about/privacy.html>

Acceptable Use and Administration of Computer and Communication Systems

<http://www.policies.vt.edu/7000.pdf>

Standard for Securing Web Technology Resources

http://it.vt.edu/content/dam/it_vt_edu/policies/StandardForSecuringWebTechnologyResources.pdf

Children's Online Privacy Protection Act information (COPPA)

<https://www.ftc.gov/enforcement/rules/rulemaking-regulatory-reform-proceedings/childrens-online-privacy-protection-rule>

Division of Student Affairs GobblerConnect Privacy Statement

<http://www.dsa.vt.edu/privacy/gobblerconnect.php>

6. Approval and Revisions

Approved December 1, 2000 by the Vice President for Information Systems, Earving Blythe.

- Revision 1

Added reference to online tool for generating privacy statements.

Approved April 15, 2002 by Vice President for Information Technology, Earving L. Blythe.

September 7, 2006: Technical revisions – (1) policy renumbered to Information Technology Policy 7030 from former General University Policy 2030; (2) reference removed to obsolete Policy 2020: Policy on Protecting Electronic Access Privilege.

- Revision 2

General update of verbiage, definitions, references, and hyperlinks.

Approved January 29, 2018 by Vice President for Information Technology and Chief Information Officer, Scott F. Midkiff.