HOUSTON COMMUNITY COLLEGE FOUNDATION

WEB PRIVACY POLICY

As an organization, the Houston Community College Foundation complies with and endorses the principles outlined in the "Donor Bill of Rights" of the Council for Advancement and Support of Education (CASE). Above all else, we strive to respect our donors and ensure their full confidence in our organization and its mission. Regarding our online activities, we are committed to treating visitors to our website with respect and courtesy, and to protecting the privacy of those who entrust us with their personal information.

SECURITY OF ONLINE TRANSACTIONS AND COMMUNICATIONS

- The HCC Foundation donation pages have been developed to ensure a high level
 of security to protect donors' personal information and safeguard it from unauthorized
 use. These pages were developed and are maintained by Blackbaud, a respected
 provider of database and online solutions for nonprofits. <u>Blackbaud</u> has been validated
 as a Level 1 service provider and payment gateway by the PCI Security Standards
 Council, having met the industry's most stringent data security requirements.
 Blackbaud partners with Bluefin to provide a PCI-validated P2PE solution, which
 encrypts cardholder data at the point of interaction using a PCI-approved ID Tech
 SREDKey P2PE device; decryption occurs off-site in an approved hardware security
 module. For Blackbaud's complete privacy policy, please visit the <u>Blackbaud's website</u>.
- 2. Online contributions will be processed and transferred to the HCC Foundation in a timely manner. Only authorized personnel will have access to credit card data.
- 3. Recipients of online communications or solicitations from the HCC Foundation will be given a convenient option to "opt in" or "opt out" of future electronic communications. In the event that the Foundation obtains email lists from an external source, they will only be acquired from trusted providers who can verify that the email owners have opted in to receive communications from charities.
- 4. The HCC Foundation will not share email addresses of donors, student scholarship applicants, or faculty grant applicants with any outside organization unless required by law.
- 5. Web servers may temporarily track information such as requested web pages or browser types. This information helps the HCC Foundation understand how the website is functioning and appealing to users, but it is not used to track individuals. Cookies—small pieces of data stored by the web browser—may remember some visitor information. These are typically used to facilitate easier use of the website on future visits. Users can accept, disable, or remove cookies through their browser settings.

- 6. The HCC Foundation will not reproduce, display, or distribute copyrighted material in a manner that infringes on the copyright holder's rights. However, "fair use" may apply in some cases. When a small portion of a work is used in a non-commercial setting and does not financially impact the rights holder, it may be considered fair use. Linking to another web page is generally not considered infringement.
- 7. The Houston Community College Foundation endeavors to keep all official website content accurate and up to date; however, due to constantly changing information, we cannot guarantee accuracy at all times. If misleading or inappropriate content is brought to our attention, we will make an immediate effort to correct or remove it.

SECURITY OF ONLINE TRANSACTIONS AND COMMUNICATIONS

- 1. Online scholarship applications are captured in a password-protected database.
- 2. To further protect students identities, scholarship applications do not require or include Social Security numbers.
- 3. Information submitted through student applications may be shared with other HCC departments or outside organizations only to the extent necessary to verify the submitted data. This may include, but is not limited to, GPAs, personal references, financial aid status, or address verification.
- 4. The HCC Foundation may communicate with student applicants and scholarship recipients as needed, but student email addresses will not be shared with outside organizations without written consent or signed scholarship agreement (electronic signature are accepted).
- 5. The HCC Foundation does not capture students' Social Security numbers for the purpose of completing the scholarship application.

FREEDOM OF INFORMATION

Certain federal, state, and local laws place additional requirements on institutions of higher education to safeguard individuals' personal information and to respond to information requests. These include the <u>Texas Public Information Act</u> and the <u>Family Educational Rights and Privacy Act (FERPA)</u>.

If you believe that your personal information has been released without your permission, please contact us at <u>info@hccsfoundation.org</u>.