

# Asheville-Buncombe Technical Community College

# (A-B Tech) Procedure

## Procedure 1012: Personally Identifiable Information

The following framework identifies how A-B Tech handles individuals’ Personally Identifiable Information (PII) in a compliant and responsible way. This framework applies to PII garnered from the College website or through the College website.

## Information Collected Automatically

When visiting A-B Tech’s website, the College automatically collects and stores the following information about an individual’s visit:

User client hostname: The public-facing Internet Protocol address of the user requesting access to the A-B Tech website.

HTTP header, "user agent": The user agent information includes the type of browser, its version, and the operating system on which that the browser is running.

HTTP header, "referrer": The referrer specifies the web page from which the user accessed the current web page.

System date: The date and time of the user’s request.

Full request: The exact requests the user made, including search results.

Status: The status code the server returned to the user.

Content length: The content length, in bytes, of any document sent to the user.

Method: The request method used.

Universal Resource Identifier (URI): The location of a resource on the server.

Query string of the URI: Anything after the question mark in a URI.

Protocol: The transport protocol and the version used.

None of the foregoing information is deemed to constitute personally identifiable information (PII).

The information that is collected automatically is used to improve this website's content and to help A-B Tech understand how users are interacting with the website. This information is collected for statistical analysis, to determine what information is of most and least interest to our users, and to improve the utility of the material available on the website. The information is not collected for commercial marketing purposes, and A-B Tech is not authorized to sell or otherwise disclose the information collected from the website for non-College commercial marketing purposes.

## Cookies

Cookies are simple text files stored on web browsers to provide a means of distinguishing among users of the website. The use of cookies is a standard practice among Internet websites. To better serve individuals, the College occasionally uses "session cookies" to enhance or customize user visits. Session cookies that can be created automatically on the device used to access the A-B Tech website do not contain personally identifiable information, and do not compromise privacy or security.

A-B Tech may use the cookie feature to store a randomly generated identifying tag on the device used to access the website. A session cookie is erased when an individual’s browser is closed. Individuals may complete a registration to personalize the website and permit a "persistent cookie" to be stored on their computers’ hard drive. This persistent cookie will allow the website to recognize the individual upon return and tailor the information presented, based on the individual’s needs and interests.

A-B Tech uses persistent cookies only with the individual’s permission. The software and hardware individuals use to access the website allow them to refuse new cookies or delete existing cookies. Refusing or deleting these cookies may limit the individual’s ability to take advantage of some features of this website.

## Information Collected via Email or Transaction

When visiting A-B Tech’s website, an individual may be asked to provide an email address or complete a transaction. Email addresses and the contents of those messages will be collected. The information collected is not limited to text characters and may include audio, video, and graphic information formats included in the message. Email addresses and the information included in those messages will be used to respond to the individual, to address identified issues, to improve the website, or to forward the message to another State or federal agency for appropriate action. Email addresses are not collected for non-College commercial purposes, and A-B Tech is not authorized to sell or otherwise disclose email address for non-College commercial purposes.

When visiting A-B Tech’s website, an individual may decide to complete a transaction, such as a survey, registration, application, financial transaction, authenticated file access, order form, or other business transaction. This information, including any PII volunteered by the individual in completing the transaction, is used by A-B Tech to operate College programs, which include the provision of goods, services, and information. The information collected by the College may be disclosed by A-B Tech for those purposes that may be reasonably ascertained from the nature and terms of the transaction in which the information was submitted.

A-B Tech does not knowingly collect PII from children or create profiles of children through the website. Users are cautioned, however, that the collection of PII submitted in an email will be treated as though it was submitted by an adult, and may, unless exempted from access by federal or State law, be subject to public access. Any minors interested in enrolling in Continuing Education classes at the College are first vetted through a minor permission form. A-B Tech strongly encourages parents and teachers to be involved in children's Internet activities and to provide guidance whenever children are asked to provide personal information online.

## Information and Choice

As noted above, A-B Tech does not collect any PII unless provided by an individual voluntarily by actions such as completing a financial transaction, sending an email, responding to a survey, responding to an authentication request or completing an online form. Online applications for enrollment at A-B Tech are routed through a third-party, College Foundation of North Carolina, which is monitored by the state.

Individuals may choose not to complete any or all of the actions above. While the choice not to participate in these activities may limit an individual’s ability to receive specific services or products through the website, it may not normally have an impact on the ability to take advantage of other features of the website, including some browsing or downloading information.

## How Information is Used

The collection of information through the A-B Tech website and the disclosure of that information are subject to the provisions of the Internet Security and Privacy Act. A-B Tech will only collect PII through the website or disclose PII collected through this website if the user has consented to the collection or disclosure of such personally identifiable information. The voluntary disclosure of PII to A-B Tech by the user, whether solicited or unsolicited, constitutes consent to the collection and disclosure of the information by A-B Tech for the purposes for which the user disclosed the information to the College, as was reasonably ascertainable from the nature and terms of the disclosure.

However, A-B Tech may collect or disclose personally identifiable information without consent if the collection or disclosure is:

* Necessary to perform the statutory duties of the College, or necessary for A-B Tech to operate a program authorized by law, or authorized by state or federal statute or regulation;
* Made pursuant to a court order or by law;
* For the purpose of validating the identity of the user; or
* Of information to be used solely for statistical purposes that is in a form that cannot be used to identify any particular person.

Further, the disclosure of information, PII, collected through this website is subject to the provisions of the Freedom of Information Law, the Family Educational Rights & Privacy Act (FERPA), and the Personal Privacy Protection Law.

A-B Tech may also disclose PII to federal, state or local law enforcement authorities to comply with court orders, the provisions of the Patriot Act of 2001, or enforce its rights against unauthorized access or attempted unauthorized access to the College’s information technology assets.

## How Information is Protected

A-B Tech is strongly committed to protecting PII collected through the website against unauthorized access, use or disclosure. Consequently, A-B Tech limits employee access to PII collected through the website to only those employees who need access to the information in the performance of their official duties. Employees who have access to this information follow appropriate procedures in connection with any disclosures of personally identifiable information.

In addition, A-B Tech works with its service provider to safeguard the integrity of its information technology assets, including, but not limited to, authentication, monitoring, scanning, auditing, and encryption. These security procedures have been integrated into the design, implementation, and day-to-day operations of this website as part of our continuing commitment to the security of electronic content as well as the electronic transmission of information.

For website security purposes and to maintain the availability of the website for all users, A-B Tech employs software to monitor traffic to identify unauthorized attempts to upload or change information or otherwise damage the website.

## Access to and Correction of Personally Identifiable Information

Any user may submit a request to the A-B Tech Division of Information Systems Technology to determine whether PII pertaining to that user has been collected through the website. Any such request shall be made in writing and must be accompanied by reasonable proof of identity of the user. Reasonable proof of identity may include verification of a signature, inclusion of an identifier generally known only to the user, or similar appropriate identification.

The IST Division shall, within five (5) business days of the receipt of a proper request, provide access to the PII; deny access in writing, explaining the reasons therefore; or acknowledge the receipt of the request in writing, stating the approximate date when the request will be granted or denied, which date shall not be more than thirty (30) days from the date of the acknowledgment. All requests will be considered in tandem with state requirements for the maintenance of public records.

In the event that A-B Tech has collected PII pertaining to a user through the A-B Tech website and that information is to be provided to the user pursuant to the user’s request, the IST Division shall inform the user of their rights to request that the personal information be amended or corrected, and will work with the individual to do so.

Owner: Vice President of Operations/Chief Information Officer, Ext. 7900

Approved: August 30, 2021