

Texas A&M University – College of Veterinary Medicine and Biomedical Sciences

Online Course Website/App

PRIVACY POLICY

Effective Date: May 1, 2020

This Privacy Policy applies to your use of the Texas A&M University – College of Veterinary Medicine and Biomedical Sciences (sometimes referred to as “TAMU” or “we” or “us”) Online Course Website/App for certain educational services described in the Online Course Website/App Terms of Use.

This Privacy Policy applies to Personal and Usage Information collected by TAMU through www.iowafadresponse.com and any other sub-domain website, mobile device application, or digital service on or to which this Privacy Policy is linked or referenced (collectively, the “Website”). Unless we notify you, this Privacy Policy does not apply to any third-party website or service that you may access through the Website.

This Privacy Policy is incorporated into and made part of our Website Terms of Use. Please read this Privacy Policy and our Website Terms of Use carefully. When you submit Personal Information or Usage Data (as those terms are described below) to us through the Website, you consent to the collection, use and disclosure of your Personal Information and Usage Data as described in this Privacy Policy.

IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY OR OUR WEBSITE TERMS OF USE, PLEASE DO NOT USE OUR WEBSITE AND ONLINE SERVICES.

1. **Changes to This Privacy Policy.** The Effective Date of this Privacy Policy appears at the top of this webpage. As business needs change, we may revise this Privacy Policy from time to time. Your continued use of the Website following the posting of the revised Privacy Policy means that you accept and agree to the changes. The revised Privacy Policy supersedes all previous versions of the Privacy Policy.

2. **Information We May Collect.**

2.1 When you use the Website, we may collect three types of data and information: Personal Information; Usage Data, and User Content. In this Privacy Policy,

2.2 “Personal Information” means any information that identifies or could be used to identify an individual, such as the following: (a) name; (b) email address; (c) Iowa Veterinary License Number; (d) National Accreditation Number; (e) cell phone number; (f) state licensures; (g) animal treatment specialty; (h) professional certifications; (i) primary county of practice; (j) year of graduation from veterinary school. Items (a) – (j), above, of Personal Information are mandatory and you must consent to the collection and use of these items of Personal Information or you will not be permitted to use the Website. We also collect data and information related to your access and use of the educational and instructional content on the Website, such as files accessed and related data; responsive data and information you may enter (e.g., replies to test/exam questions; test/exam scoring; course completion data; assignment materials; etc.).

2.3 Personal Information does not include either: (a) aggregated Personal Information to the extent that an individual’s identity cannot reasonably be derived from it; or (b) publicly available Personal Information that has not been combined with non-public Personal Information. We may use and disclose

such aggregated Personal Information for research and education purposes, including but not limited to developing research proposals; improving services offered through the Website; and conducting demonstrations of the structure, purpose, and efficacy of the Website to potential research sponsors, collaborators, and course authors.

2.4 “Usage Data” is information about an individual’s activity on or through the Website that, by itself, does not reasonably identify the individual, such as the following: (a) browser and operating system information; (b) computer or device type; (c) time spent navigating certain webpages or connected via mobile applications; (d) information collected through Data Collection Technologies (as defined below).

2.5 Generally, we do not consider Usage Data as Personal Information, because Usage Data by itself usually does not identify an individual. However, in some jurisdictions, Usage Data may be considered Personal Information because it can be used to make inferences about you.

3. Collection, Use, and Disclosure of Personal Information.

3.1 How We May Collect Personal Information. We and our third-party service providers, if any, may collect Personal Information through your use of the Website such as when you register with us and participate in the educational services offered at the Website, which may also include periodic surveys and questionnaires.

3.2 We may collect information about your use of and interaction with the Website (or with an application for mobile devices (an “App”)) such as operating system type; browser type; domain and other system settings; search queries; the country and time zone in which your computer or the mobile device or tablet is located; metadata; and other information associated with other files stored on your device. We also may collect information about the location of the mobile device or tablet used to access the Website (“Location Data”). Location Data includes: (a) the location of the mobile device or tablet derived from GPS or WiFi use; (b) the IP address of the mobile device or tablet or internet service used to access the Website; and (c) other information made available by a user. If you do not want us to collect Location Data from your device, please delete the App or disable the location settings on your device or tablet. Note, however, that disabling the location setting may affect your ability to access and use an App.

3.3 How We May Use Personal Information: We may use Personal Information for the purposes described at the time of its collection or as described in this Privacy Policy. For example, we may use Personal Information as follows:

- (a) To confirm registration, respond to your inquiries or fulfill your requests, or to email you materials you requested;
- (b) To send you information that you or your educational institution have requested;
- (c) To allow you to send Website-related content through the Website/App;
- (d) If you contact us through the Website, to keep a record of your contact information and correspondence to us when responding to you;
- (e) To notify you about important information regarding changes to our terms, conditions, and policies; and
- (f) To analyze use of the Website to help us detect problems, prevent fraud, identify usage trends; and improve user experience.

3.4 We May Disclose Your Personal Information as follows:

(a) We may disclose your Personal Information to any party for whom your consent has been provided. For example, we may disclose your Personal Information to IDALS (and applicable staff members) that relates to your use of the Website.

(b) We may disclose your Personal Information with IDALS and The Texas A&M University System for the purposes described in this Privacy Policy and as required by law.

(c) We may disclose information with third-party service providers, if any, that support our operations.

(d) We may also disclose Personal Information: (i) as permitted by law; (ii) if we determine that the disclosure of specific information is necessary to comply with the request of a law enforcement or regulatory agency or other legal process; (iii) to protect the legitimate rights, privacy, property, interests or safety of TAMU or our affiliated entities customers, business partners, employees, or the general public; (iv) to pursue available remedies or limit damages; (v) to enforce our Terms of Use and this Privacy Policy; and (vi) to respond to an emergency.

(e) We will not sell, in whole or in part, any Personal Information (aggregated or not) to any third party.

4. Collection, Use, and Disclosure of Usage Data.

4.1 We collect, use and disclose Usage Data for all lawful purposes in the operation and conduct of our businesses.

4.2 **How We May Collect Usage Data.** When you use the Website/App, we and our third-party service providers, if any, may collect the Usage Data that is collected by most browsers or automatically through your device. We (and our third-party service providers, if any) may track and collect Website/App data, including when you accessed our servers and what information and files were accessed and/or downloaded. We also collect Usage Data through our use of Data Collection Technology. For more information about how we use Data Collection Technology, including cookies, please review Section 5 below.

4.3 **How We May Use and Disclose Usage Data.** We may use and disclose Usage Data for any purpose, except where we are restricted from doing so under applicable law. In general, if we are required to treat certain types of Usage Data as Personal Information under applicable law, we use and disclose it as described in Section 3 above.

4.4 In some instances, we may combine Usage Data with Personal Information (such as your device ID with your name). If we combine any Usage Data with Personal Information, we treat the combined information as Personal Information for so long as it is combined and can be used to identify you.

5. User Content

5.1 In some situations, you may be able to voluntarily upload content to the Website and share with other users (such as bulletins and forums). Any content that you choose to share and submit for posting is neither private nor confidential and you should expect that it may be made public and known to others. Information you choose to upload will be posted along with your user name and other information. TAMU has no control over the conduct of any user and disclaims all liability in this regard.

6. Cookies and Other Data Collection Technology

6.1 We refer to cookies, web beacons (also known as pixel tags and clear GIFs) and other similar technology as “Data Collection Technology.” A cookie is a small text file that is sent to or accessed from your web browser, device, or your computer’s hard drive. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the “lifetime” of the cookie (when it expires), and a randomly generated unique number or other similar identifier. A cookie may also contain information about your computer or device, such as user settings, browsing history, and activities conducted while using the Website. A web beacon (also called a pixel tag or clear GIF) is a piece of computer code that enables us to monitor user activity and website traffic.

6.2 **How We Use Data Collection Technology.** Data Collection Technology helps us improve your experience of the Website. In particular, we use analytics cookies to compile statistics about the use of the

Website, help us analyze technical and navigational information about the functionalities provided, and detect and prevent fraud. We also may use Data Collection Technology to collect information from the computer or device that you use to access the Website, such as your operating system type, browser type, domain and other system settings, as well as the language your system uses and the country and time zone in which your computer or device is located.

6.3 **Your Control of Cookies.** Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject cookies or alert you when a cookie is placed on your computer or device. You may also be able to reject mobile device identifiers by activating the appropriate setting on your mobile device. Although you are not required to accept cookies or mobile device identifiers, if you block or reject them, you may not have access to all features available through the Website.

6.4 **Our Policy on Do Not Track Signals:** Some web browsers incorporate a “Do Not Track” (“DNT”) or similar feature that signals to websites that a user does not want to have his or her online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain Personal Information about the browser’s user. We follow the DNT signals we receive from your browsers.

7. Choices and Access.

7.1 **Access Requests.** You may request access to any of your Personal Information that you have previously provided to us through the Website. You may also request that we update, modify or delete your Personal Information that we have collected. Please contact us by email at cethelpdesk@cvm.tamu.edu to exercise these rights. Please note that we cannot remove or modify your Personal Information from the databases of third parties to which we have disclosed your information prior to your opt-out or access request. Please contact those third parties directly.

8. Links to Other Websites and Services

8.1 The Website may include links to third-party websites and services that we do not operate. If you visit a third-party website or service via a link on the Website, you are subject to that third party’s privacy practices and policies. This Privacy Policy does not apply to any Personal Information that you provide to third-party websites or services. A link to a third-party website or service does not mean that we endorse that third party or the quality or accuracy of the information presented on its website or service.

9. Notice to International End Users

9.1 Currently, the Website is controlled and operated by us from the United States, and is not directed at, marketed towards, or intended for use by individuals, entities, or activities that would subject us to the laws or jurisdiction of any state, country, or territory other than the United States. Your Personal Information, Usage Data, and Patient Information may be stored and processed in any country where we have facilities or in which we engage service providers. By using the Website, you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have different data protection rules than those of your country.

10. Security

10.1 We take reasonable precautions intended to help protect the Personal Information that we collect and store; however, no system or online transmission of data is completely secure. We cannot guarantee the security of information transmitted to or through the Website. Any transmission is at your own risk. Please use security measures to protect your Personal Information and Patient Information.

11. Children’s Privacy

11.1 The Website is not directed to or intended for use by minors. Consistent with the requirements of the U.S. Children’s Online Privacy Protection Act, if we learn that we have received information directly

from a child under age 13 without his or her parent or legal guardian's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use the Website. Subsequently, we will make commercially reasonable efforts to delete such information.

12. Questions or Comments

12.1 We welcome your questions and comments about this Privacy Policy or how we process your Personal Information or Usage Data. Please contact us using the information below, and we will respond to you as soon as reasonably possible.

By Mail:

Texas A&M University
College of Veterinary Medicine & Biomedical Sciences
Attn: Danelle Weaver
668 Raymond Stotzer Parkway
College Station TX 77840

By Phone: 979-458-8450

By Email: cet@cvm.tamu.edu