Privacy Policy

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Created by:	S Beidas
Approved by:	K Christensen & S Vaishnav
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Purpose

The Privacy Policy ("Policy") is intended to establish requirements for designing and implementing Illinois Tech's privacy protections for the collection, use and sharing of information to support its objectives and processes through its platforms.

Scope

Illinois Tech students, faculty, and staff who store, process, transmit, and otherwise handle privacy information and data must conform to this Policy. The scope of this Policy is University-wide.

Definitions

Definitions may be found in the linked Glossary.

I. Privacy Rights

Illinois Tech is supportive of individuals rights as outlined in HIPAA and other regulations and contractual requirements. Please contact privacy@iit.edu to discuss or action upon any of the rights described below.

Right to Privacy and Confidentiality

Individuals associated with Illinois Tech have the inherent right to privacy and the expectation that their PHI & ePHI, including healthcare data, will be treated with the utmost confidentiality and respect. Illinois Tech only collects and uses personal information, including healthcare data, for legitimate and specified purposes.
Illinois Tech is committed to maintaining the security and integrity of personal information. Appropriate safeguards, including encryption, access controls, and regular security assessments, will be implemented to protect sensitive data, including healthcare information, from unauthorized access or disclosure.

Right to Access PHI/ePHI

Individuals have the right to access their own PHI/ePHI records, including healthcare records, held by Illinois Tech. This includes communications regarding PHI/ePHI via alternative communication methods and/or locations.
They also have the right to request corrections or updates to their data when inaccuracies are identified, subject to applicable laws and policies.

Right to be Informed

Individuals have the right to know how their PHI/ePHI is being used and for what purposes.
Data collection is transparent, and individuals are informed about the purpose of data collection. Consent is obtained for the collection and use of this sensitive information, including healthcare data, whenever required by law or institutional policy.

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Right to File a Complaint

Individuals have the right to file a complaint if they believe their `rights have been violated.

Right to Request Restrictions

Individuals have the right to request organizations restrict the usage and disclosure of their PHI/ePHI.

Right to an Accounting of Disclosure

Individuals have the right to request how their PHI/ePHI is disclosed by organizations. Illinois Tech does not disclose personal information, including healthcare data, to third parties without explicit consent, except when required by law or when necessary to protect the safety and well-being of individuals. When sharing data with external entities, Illinois Tech will enter into agreements that ensure the responsible handling and protection of personal information.

II. Data Collection, Use, and Sharing

Website Data

Type of Data Collected via Illinois Tech's Website
- Illinois Tech does not collect PII unless Website visitors voluntarily provide it.
- Illinois Tech uses cookies to anonymously identify unique visitors. The use of these cookies does not reveal PII.

Use of Data Collected via Illinois Tech's Website
- Illinois Tech uses PII to respond to Website visitors' inquiries.
- Illinois Tech uses cookies to analyze traffic patterns, user interests, and track user movement on the Website. Illinois Tech also uses cookies to gather demographic information such as age and gender to analyze visitor behavior on an aggregate level for marketing purposes.
- Illinois Tech also logs IP addresses. These IP addresses are not associated with PII, so individual users are not personally identifiable. This data is retained for seven years. For specifics, please see Data Standard.
- Illinois Tech uses Google Analytics and other web analytics to monitor and collect information about the use of the Website. Illinois Tech uses this data to optimize website content and understand user behavior.
- Illinois Tech uses cookies, pixel tags, and analogous technologies from marketing networks to measure and identify target audience for remarketing to other similar audiences based on interests.
- Illinois Tech may also use this data for its own marketing purposes such as promotional campaigns to notify prospective and current customers about upcoming events, upgrades, and new offerings. Recipients can control whether they receive these communications by using the "opt out" feature.

Sharing Data Collected via Illinois Tech's Website

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- Illinois Tech does not sell, rent, or share PII with affiliates or third parties (unless it is a subcontractor of Illinois Tech), except as required by law.
- Illinois Tech may share quantitative, non-personal data about site visitors with affiliates, sponsors, institutional partners and other third parties.
- Illinois Tech uses Facebook's "Custom and Lookalike Audience Campaigns" to display personalized ads to members of email lists as well as people who match target audience criteria. To facilitate this, Illinois Tech provides email addresses and phone numbers to Facebook to determine whether visitors are registered and eligible Facebook account holders.
- Illinois Tech shares external links to third-party entities on our Website as a courtesy. Illinois Tech does not exert control over these entities. Nor does it take responsibility for these organizations, their views, use of technology, or the accuracy of their information.

Removal of Personal Data Collected
- Illinois Tech and its community members are required to comply with the removal of PII upon request within a reasonable timeframe.

III. Responsibilities for Students, Faculty, and Staff

Outlined below are the types of data, the use of data, and data sharing of the University's three primary communities: Students, Faculty, and Staff.

All

- Any Student, Faculty, and Staff who handles privacy information shall be required to complete privacy training. This training will be issued annually.

Students

- Illinois Tech must remain in compliance with Family Educational Rights and Privacy Act (FERPA), Children's Online Privacy Protection Act (COPPA), and Personal Information Protection Act (PIPA).
- Students are granted access only to their own personal data. They may not be granted access to other students' data. An exception to this would include student workers and volunteers to support departmental operations and faculty-directed research projects.
- Students may access data only for grants that they are required to support.
- Use of specific student data must comply with FERPA, COPPA, HIPAA, and PIPA.
- Illinois Tech utilizes student data to support academic pursuits and the use of Illinois Tech Platforms.
- This data may also be used to notify students of updates on platforms, security issues, and feature upgrades. Illinois Tech does not sell, rent, or share student information it collects with affiliates.
- Demographic and location data is used for analysis and evaluation for marketing purposes.
- Illinois Tech's Student Health and Wellness Center accesses student data to support them when they use the center's services.

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- Students' financial records are accessed by Illinois Tech's Financial Aid and Student Accounting offices to support them in meeting their financial obligations.

Faculty

- The faculty is responsible for supporting Illinois Tech's data handling and downloading requirements, including those required by grants.
- Advisors may access students' academic records, but general faculty may not.
- Faculty have access to student contact information limited to email and class schedules. They are not given other personal data, with the exception of faculty who employ students.
- Immigration status is not widely accessible by faculty, but it may be accessed by select members of the faculty for specific reasons.
- No health-related information is shared with faculty except for required information to support accommodations allowed by the Americans with Disabilities Act.
- Faculty use and download data to support them in performing their academic teaching roles as well as grant work.
- Advisors access students' academic records to provide guidance in selecting classes and deciding on majors.
- Faculty use students' contact information and class schedules to get in touch with students and answer questions.
- Faculty may access a student's health-related records only when approved and must be in support of defining and refining accommodations.
- Illinois Tech allows sharing of data that is absolutely necessary to support faculty and university-sponsored activities.

Staff

- Illinois Tech Staff are responsible for following and supporting operational processes. This requires that they access student and faculty data and grant requirements.
- Illinois Tech Staff uses the platforms listed above to access data to support applications, registration, enrollment, billing, financial aid, grant requirements and other operations, including responding to students and prospects questions.
- While providing this support, Illinois Tech's Support are responsible for following operational processes, including those that support grant requirements and protect confidential personnel and health data.
- Illinois Tech allows sharing of data that is absolutely necessary to support staff and university-sponsored activities.

IV. Research Data

Depending on roles, there are multiple groups that may have access to Research Data, including:

- Faculty and selected Staff conducting research for grants and other projects
- Staff has limited access to only Research data necessary to complete specific tasks
- Students who are participating in research projects have access to that Research Data

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External Researchers may have access to selected Research Data. This includes academic consortia when collaborating with other universities

Awarding agencies including international, federal, state and municipal governmental agencies, military branches, and private organizations.

Visiting Researchers and Visiting Scholars access Research Data for selected projects

Friends of Illinois Tech, including vendors and contractors who are supporting projects or supporting the University functions such as data recovery in an emergency.

Research Data is stored in cloud storage, local servers, University-owned edge devices, BYOD devices, external drives, Network Attached Storage (NAS), storage media, handwritten documentation, and printed documents.

Research Data is transmitted internally within Illinois Tech and transferred to external organizations via email, shared cloud storage and using storage media. Sharing Research Data must comply with the principle of "Least Privilege."

Privacy data should be only stored and shared on cloud storage. Illinois Tech currently uses Amazon Web Services (AWS) for these purposes.

Illinois Tech does not actively delete Research Data over time. Legacy Research Data should be stored in the locations listed above. See the Access Control Plan regarding access to Research Data.

If a potential compromise is reported to Illinois Tech or detected by the University, it must be reported to CTS@iit.edu. If it is determined to be privacy-related, the Privacy Officer must be notified immediately.

CTS will assess the potential compromise, assess the source and scope, and identify relevant stakeholders to investigate and resolve outstanding issues. The Privacy Officer works with CTS and relevant stakeholders to deliver the required reporting.

For steps to address incidents, please see Incident Response Plan.

V. Privacy Personnel
Illinois Tech has the expectation that "If you see something, say something." When students, faculty, and staff observe privacy issues, they are responsible for bringing the issue to the following Illinois Tech personnel:

- **HIPAA Privacy Office**r – Sejal Vaishnav, spatel2@iit.edu
- **HIPAA Security Officer** – Sejal Vaishnav spatel2@iit.edu
- **Project and Privacy Coordinator** for University Research: Lisa Litchman, llitchman@iit.edu
- **Associate Vice President** for the Student Health and Wellness Center, and Center for Disability Resources: Gary Walley, gwalley@iit.edu

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- **Assistant Vice President of Financial Aid Financial Aid Department**: Elizabeth Wahlstrom Helgren, ewahlstr@iit.edu
- **Vice-Provost of Student Affairs and Dean of Students:** Katherine Stetz, kstetz@iit.edu
- **Data Security Officer**: Sejal Vaishnav, spatel2@iit.edu
- **Interim Vice President for the Human Resources Department:** Amit Thomas, athomas18@iit.edu
- **Registrar for the Office of the Registrar:** Khalilah Guyton-Hamlin, kguytonhamlin@iit.edu
- **Assistant Vice President of HEA Compliance Title IX Compliance Coordinator for the Title IX Office:** Virginia D. Foster, foster@iit.edu
- **Privacy Contact Email**: Universal email address to be used for all HIPAA-related issues and inquiries. privacy@iit.edu
- **Associate Vice President of Enrollment for the Admissions Office:** Abigail J. McGrath amcgrat1@iit.edu

VI. Notifications

Website

This Policy and Illinois Tech's Website Privacy Statement is subject to change at the sole discretion of Illinois Tech. Visitors' continued use of the Illinois Tech Website implies their understanding and acceptance of the university's policies. Illinois Tech does not maintain responsibility to individually notify Website visitors of changes.

Breach Notifications

When security breach procedures are activated, the Officers listed above will be notified. These Officers will determine whether external entities should be notified.

Internal Notifications

As modifications are made, notifications will be sent to the officers listed above.

VII. Privacy Data Logging

Illinois Tech logs access to its website and platforms listed above, including web browser type and IP addresses. This data is used to monitor usage and support Illinois Tech's technical and security administration team in managing and monitoring access. This log data is maintained for a defined period of time to respond to inquiries. For specifics, please see Data Standard.

Responsibility

Illinois Tech's Office of the General Counsel is responsible for ensuring compliance with this Policy to the extent of their capabilities and for holding external vendors working on their behalf accountable.

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Violations

Illinois Tech investigates and responds to all reports of violations of this and other related policies. Violation of policies will result in disciplinary action in accordance with the Acceptable Use Policy (AUP), existing security policies, and as determined by organizational leadership. If you have any questions about this Policy, please contact CTS@iit.edu.

Review

Review of this Policy will be completed annually or as needed to ensure its applicability to the changing environment.

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