

# Privacy Policy, Security, and Customer Service

Date of Last Revision: December 2018

## Online Privacy

Online privacy is important to us. As such, it is the policy of Hondros College of Nursing to collect, process, and retain personal information only as appropriate in the course of providing information and services to visitors and users of our website and certain mobile applications, including students, student prospects, alumni and employees. This privacy policy describes our online collection and use of personal information about you at our websites, blogs, message boards, social media pages, and mobile applications that link to this policy (collectively the “Online Services”). We may also offer websites and mobile applications that have their own privacy policies. Please refer to the privacy policy associated with the mobile application or website you are using for the governing privacy policy. For the purposes of this policy, personal information is defined as information, or a combination of information types, that could reasonably allow you to be identified.

Consistent with this policy, we collect information in the following ways:

### Voluntarily Provided Information

We may collect the following user provided personal information to include:

- full name
- email address
- postal address
- social security number
- tax identification number
- identification number
- date of birth
- sex
- race
- ethnicity
- phone number
- course assignments (e.g., papers), and tests
- employer
- job title
- citizenship
- alien registration number
- financial data and documents
- academic data and documents
- identity verification data and documents

In some cases, students who are enrolling in a course or program or buying books, or other visitors utilizing online commerce functions to purchase goods or services, may be required to provide credit card information for billing purposes. If making a request for Admissions or Transfer Credit, students may also be required to provide information related to prior academic history, employment, or military service. If a student chooses not to provide this personal information, he/she may be unable to receive some of the services we offer.

We also collect personal information when you voluntarily provide it or make it available to us by (1) logging into, or creating an account on one of our Online Services; (2) providing feedback to us through a feedback tool; (3) posting a review or making other comments on any Interactive Features (hereinafter defined) available in our Online Services; or (4) logging-in to our Online Services through a social media platform or similar tool, if available. Each manner in which we collect personal information about you identified above occurs only when you voluntarily provide information to us.

We may offer through our Online Services public forums, newsfeeds, blogs, message boards, social media pages and similar tools (collectively, “Interactive Features”). The posts or comments you make on Interactive Features may be public and viewed by others. As such, you should use care before posting information about yourself, including personal information, online. You acknowledge and understand that you have no expectation of privacy or confidentiality in the content you submit to Interactive Features. Except where required by applicable law, we assume no obligation to remove personal information from postings to Interactive Features and you disclose any personal information in your postings at your own risk.

### **Information Created in the Course of Your Use of the Online Services**

We also create information that becomes subject to this privacy policy. This includes, for example, assignment grades, test scores, class grades, transcripts, persistence data, and communications with you.

### **Cookies and Automatically Collected Information**

We may collect the following information automatically through your use of the Online Services:

- IP/MAC address
- online identifiers
- log-in details
- E-campus and course activity data.

For certain Online Services, we also use cookies and similar technologies to enable one-click login to the student/faculty campus, for analytics, fraud detection and advertising. In addition to the following, see our Cookies Policy [Link](#) for more information about our cookie usage. We and our service providers and third-party advertisement servers may use cookies and similar technologies to, over time, collect information about your usage of our Online Services and across different websites that have a business relationship with Hondros College of Nursing’s

service provider or third-party advertisement server. To make choices about interest-based ads from participating third parties, please visit the DAA consumer [opt out page](#).

Most browsers are initially set to accept cookies. You can [set your browser](#) to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. You can find more information regarding management of your cookies at [About Cookies](#).

We do not currently respond to web browser “do not track” signals or other mechanisms that provide a method to opt out of the collection of information across the networks of websites and online services in which we participate. If we do so in the future, we will describe how we do so in this Privacy Policy. For more information about do not track, visit [www.allaboutdnt.org](http://www.allaboutdnt.org).

Where required by applicable law, and in particular where automatically collected personal information is not strictly necessary for us to provide you with any part of the Online Services you have specifically requested, we obtain your consent for the use of these automatic collection technologies, web beacons, and other tracking technologies described above through a website banner.

## **Mobile Applications**

Our Online Services may collect certain information automatically from your mobile device when you use one of our mobile applications, including the type of mobile device you use, your mobile device’s unique device identifier, your IP address, and information about the way you use our Online Services. We use this information in an aggregate fashion to track access to our websites, but we do not disclose site usage by individual IP addresses, and web server logs are held on a temporary basis before being deleted from our systems.

Our Online Services may collect precise information about the location of your mobile device, but only with your express consent. Once you have consented to the collection of the precise location of your mobile device, you may adjust this consent by managing your location preferences through the settings of your mobile device.

You can stop all collection of information by our Online Services by uninstalling our mobile application through the standard uninstall process offered through your mobile device.

## **Third Party Websites**

We may provide links to third-party websites. You acknowledge that such links are provided for your convenience only and do not constitute an endorsement by us of such third-party websites. Since we do not control these third-party websites and are not responsible for the contents of any linked-to, third-party websites or any hyperlink in a linked-to website, we assume no responsibility for the privacy practices of such websites. We encourage you to review the privacy policies posted on those, and all, third-party websites.

## **How Information is Used and Shared**

We may use your personal information for the following purposes:

- Identification and authentication: We use your identification information to verify your identity when you access and use the Online Services and to ensure the security of your personal information. This is so we can comply with our contractual obligations to you.
- Operating the Services and Providing Other Services to You: We process your personal information to provide the Online Services you have requested and other services for which we have an agreement with you, for example, if you are enrolled as a student or are seeking to enroll as a student. This is so we can comply with our contractual obligations to you or in furtherance of entering into a contract with you.
- Improving our Services: We analyze information about how you use the Online Services to provide an improved experience for our customers of all our Services, including product testing and site analytics. It is in our legitimate business interests to use the information provided to us for this purpose, so we can understand any issues with the Online Services and improve them.
- Communicating with you: We may use your personal information when we communicate with you, for example if we are providing information about changes to the terms and conditions or if you contact us with questions. It is in our legitimate interests that we are able to provide you with appropriate responses and provide you with notices about the Online Services.
- Marketing: we may use your personal information to send you newsletters or information about Hondros College of Nursing or third party products and services that may be of interest to you. It is in our legitimate interest to provide more relevant and interesting advertising messages. Where necessary, we will obtain your consent before sending such marketing messages.
- Exercising our rights: we may use your personal information to exercise our legal rights where it is necessary to do so, for example to detect, prevent and respond to fraud claims, intellectual property infringement claims or violations of law or our applicable policies and the Terms of Use.
- Complying with our obligations: we may process your personal information to, for example, carry out fraud prevention checks or comply with other legal or regulatory requirements, where this is explicitly required by law. We may also process special categories of personal information, such as sex, race, and ethnicity in order to carry out obligations in the field of employment.
- Customizing your experience: when you use the Online Services, we may use your personal information to improve your experience of the Online Services, such as by providing interactive or personalized elements on the Online Services and providing you with content based on your interests;
- We may also anonymize your personal information in such a way that you may not reasonably be re-identified by us or any other company, and may use this anonymized information for any other purpose.

## **Disclosures of Personal Information**

We do not share, sell, rent, swap or authorize any third party to use personal information submitted by users of our Online Services for the third party's own purposes.

We may share your personal information with third parties under the following circumstances:

- Service providers and business partners: we may share your personal information with our service providers and business partners that perform marketing services and other business operations for us for the purposes set forth above. For example, we may partner with companies to process secure payments, fulfill orders, optimize services, serve online behavioral advertising, send newsletters and marketing messages, support email and messaging services, and analyze information.
- Affiliates: We may share your information with affiliated companies for the purposes set out above.
- Where required by law: we may share your personal information with law enforcement agencies, courts, other government authorities or other third parties where we believe necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party. Agencies that regulate our activities to which personal information may be disclosed include, but are not limited to: the U.S. Department of Education, Accrediting Bureau of Health Education Schools, agencies of the state of Ohio, other accrediting bodies, other state agencies, the U.S. Department of Veterans Affairs, other federal agencies, and/or the various military service branches.
- In the context of a transaction: we may share your personal information with potential transaction partners, service providers, advisors, and other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell or transfer all or a portion of our assets or business. Should such a sale or transfer occur, we will use reasonable efforts to obligate the entity to which we transfer your personal information to use it in a manner that is consistent with this Privacy Notice.

We may also share de-identified aggregate information that may not reasonably be re-identified by us or any other company with third parties and advertisers so they can measure the effectiveness of any advertisements viewed in connection with our Online Services. For example, we may tell advertisers the number of users who clicked on a particular advertisement.

## **Family Educational Rights and Privacy Act (FERPA)**

The Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, requires certain educational institutions, including APUS, to establish and publish a written institutional policy regarding student privacy rights under FERPA. The law provides that except in limited circumstances the institution must not disclose, without appropriate consent, the education records of its students. For more information, please visit <http://www.hondros.edu/HCNDisclosures>

## **Information Security and Storage**

As part of our commitment to maintaining reasonable security, we retain your personal information for as long as we have a relationship with you and longer if for legitimate business purposes. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations. We may also retain records to investigate or defend against potential legal claims.

## **Customer Service and how to Acquire Additional Information**

We are committed to providing every user -- including students, applicants, and other persons who contact us -- with prompt, high-quality support at all times. Email is the primary form of contact for users, including Hondros College of Nursing students, and we encourage you to email us with questions, comments and concerns. You may also contact us by telephone. Hondros College of Nursing has a [contact page](#) listing essential email addresses, telephone numbers and fax numbers.

We encourage you to contact us at the contact information set forth below to update or correct your information if it changes or if the personal information we hold about you is inaccurate. Where you have provided your consent to any use of your personal information, you can withdraw this consent at any time.

Please note that we may require additional information from you in order to honor your requests.

If you would like to discuss or exercise any rights you may have under law, please contact us at the contact information set forth below.

## **Changes to this Policy**

This Privacy Policy may be amended from time to time. Any such changes will be posted on this page and the effective date of such changes reflected above as the date last updated.

## **Contact Information**

Our contact information is as follows.

Hondros College of Nursing  
4140 Executive Parkway  
Westerville, OH 43081  
855-906-8773