

POLICY: 6Hx28:7A-04



Responsible Executive: Chief
Information Officer

Policy Contacts: Managing Dir, CISO

Specific Authority: 1001.64, F.S.

Law Implemented: 1001.64, F.S.; General
Data Protection Regulation (GDPR)

Effective Date: 09-11-2025

Date of Last Policy Review:
09-11-2025

Online Privacy, Access and Security

Policy Statement:

- I. Valencia College (“College”) shall respect the privacy of all web site visitors to the extent permitted by law. The College official website and all subsites must adhere to and notify visitors of their information collection policy by including the official “Online Privacy Statement” on all website pages and subsite main pages. The “Online Privacy Statement” shall include contact information for visitors with questions concerning the statement, data collection, or data security.
 - A. The College official website and subsites include, without limitation, all web pages within the College domains “valenciacollege.edu” and its derivatives.
 - B. The College official website is maintained jointly by the Office of Information Technology and Strategic Communications and Marketing. All official website pages shall include a link to the “Online Privacy Statement.”
 - C. College subsites may be maintained by College employees. All official subsite pages shall include a link to the “Online Privacy Statement.” All unofficial subsite main pages (i.e., entry-point or introductory pages to the subsites) shall include links to the “Online Privacy Statement.” Faculty and staff must include links to the “Online Privacy Statement” on the main pages of any subsites they maintain.
 - II. The College President or designee(s) may adopt procedures to implement this policy.
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Policy History:

Adopted 6-15-83; Amended 11-18-92; Amended 3-12-02; Amended 9-11-25; Formerly 6Hx28:04-38.04

Related Documents/Policies:

College Policy 6Hx28: 7A-01 Information Security Program

Procedures:

The College shall address the following topics and information as part of the online privacy statement on the College web site:

I. Online Privacy Statement

- A. The policy of the College is to respect the privacy of all web site visitors to the extent permitted by law. This online privacy statement is intended to inform the visitor of the ways in which this web site collects information, the uses to which that information will be put, and the ways in which the College will protect any information the visitor chooses to provide the College.
- B. There are four types of information that the College web site may collect during a visitor's activity on the College web site: network traffic logs, web visit logs, cookies, and information provided by the visitor.

II. Network Traffic Logs

- A. In the course of ensuring network security and consistent service for all users, the College employs software programs to do such things as monitor network traffic, identify unauthorized access or access to nonpublic information, detect computer viruses and other software that might damage College computing devices or the network, and monitor and tune the performance of the College network. In the course of such monitoring, these programs may detect such information as e-mail headers, addresses from network packets, and other information. Information from these activities is used only for the purpose of maintaining the security and performance of the College's networks and computer systems.
- B. Personal identifiable information (PII) from network traffic logs is not released to external parties without the consent of the visitor, unless required by law. For more information on PII, see College Policy 6Hx28: 7A-01 Information Security Program.

III. Web Visit Logs

- A. The College web sites routinely collect and store information from online visitors to help manage those sites and improve service. This information includes the pages visited on the site, the date and time of the visit, the internet address (URL or IP address) of the referring site, the domain name and IP address from which the access occurred, the version of browser used, the capabilities of the browser, and search terms used on the College's search engines.
- B. The College web site makes no attempt to identify individual visitors from this information: any PII is not released to external parties without their consent unless required by law.

IV. Cookies

- A. Cookies are pieces of information stored by the visitor's web browser on behalf of a web site and returned to the web site on request. The College web site may use cookies for two purposes: to carry data about a visitor's current session at the site from one web page to the next, and to identify the visitor to the site between visits. If the visitor prefers not to receive cookies, the visitor may turn them off in their browser, or the visitor may set their browser to ask the visitor before accepting a new cookie. Some pages may not function properly if the cookies are turned off.
- B. Unless otherwise notified on the College web site, the College will not store data, other than for these two purposes, in cookies. Cookies remain on a visitor's computer, and accordingly the College neither stores cookies on their computers nor forwards them to any external parties. Unless otherwise notified on the College web site, the College does not use cookies to track a visitor's movement among different web sites and does not exchange cookies with other entities.

V. Information Provided by Web Site Visitors

- A. In the course of using the College web site, the visitor may choose to provide the College with information to help the College serve the visitor's needs. For example, the visitor may send the College electronic mail (through a mailer or a web form) to request information, the visitor may sign up for a mailing list, or the visitor may send the College their address so the College may send the visitor an application or other material. Any PII a web site visitor sends the College will be used only for the purpose indicated.
- B. Requests for information will be directed to the appropriate staff to respond to the request, and may be recorded to help the College update the College web site to better respond to similar requests.
- C. The College will not sell, exchange or otherwise distribute a web site visitor's PII without their consent, except to the extent required by law or as otherwise allowed by applicable laws, rules, and regulations. The College does not retain the information longer than necessary for normal operations. Each web page

requesting information discloses the purpose of that information. If the visitor does not wish to have the information used in that manner, the visitor is not required to provide it.

- D. Visitors will be directed to contact the person listed on the specific web page or the Office of the Vice President for Policy and General Counsel with questions or concerns on the use of PII.
- VI. The College web sites and subsites may provide links to other World Wide Web sites or resources. The College does not control these sites and resources, does not endorse them, and is not responsible for their availability, content, or delivery of services. In particular, external sites are not bound by the College's online privacy policy; they may have their own policies or none at all. Often a visitor can tell they are leaving a College web site by noting the Uniform Resource Locator (URL) of the destination site.
- VII. The College is committed to complying with the General Data Protection Regulation (GDPR) requirements for data collected on the College's websites from visitors within the European Union (EU). The College ensures that all data collection and processing activities are conducted in accordance with GDPR principles, which include lawfulness, fairness, transparency, data minimization, accuracy, storage limitation, integrity, and confidentiality. The College collects and processes personal data only for specified, explicit, and legitimate purposes. Personal data is not maintained longer than necessary for the purposes for which it is processed and the College has implemented appropriate technical and organizational measures to protect personal data against unauthorized or unlawful processing, accidental loss, destruction, or damage.
 - A. Visitors from the EU have the right to access, rectify, erase, restrict processing, and object to the processing of their personal data, as well as the right to data portability. Such visitors wanting to exercise any of these rights or have concerns about data protection practices are encouraged to contact the Office of Information Technology (OIT) at oit servicedesk@valenciacollege.edu.
 - B. The College's adherence to GDPR requirements does not conflict with applicable United States legal requirements. The College's strives to maintain the highest standards of data privacy and protection for all users.
- VIII. For any other questions relating to online privacy, access, and security, contact the Vice President for Policy and General Counsel at policy@valenciacollege.edu or 407-582-3433.

Procedure History:

Adopted 6-15-83; Amended 11-18-92; Amended 3-12-02; Amended 9-11-25; Formerly 6Hx28:04-38.04

Date of Last Procedure Review: 09-11-2025