

University of Pennsylvania Policy on the Privacy of Alumni Data

- I) General Privacy Statement. The University of Pennsylvania understands the importance of protecting the privacy of personal information, especially in today's increasingly electronic environment. Penn seeks to enhance opportunities and services for Penn alumni, consistent with strong privacy protections for alumni data. Penn has adopted the following policy and related procedures to protect alumni data and provide alumni with appropriate control over the use, accuracy, and availability of their data.
- II) Scope. This statement applies to all Penn offices that interact with alumni data. Specifically, it applies to Development and Alumni Relations, School and Center development and/or alumni relations offices, and other offices or groups that work with alumni data.
- III) Use and Sharing Restrictions.
- a) *Purpose restriction.* Penn will use alumni data only for Penn alumni-oriented outreach, service, development, and engagement programs. Such programs include for example communicating about alumni events, providing lifelong e-mail addresses, fundraising activities, building relationships, and offering online community services.
 - b) *Limitation on Sharing.* Alumni data will be shared only with Penn staff and student workers with a need to know; with authorized users¹ in the case of directory information in the online community services; and with approved partners of Penn for the purpose of advancing a program designed to serve Penn alumni. Penn will not share personal information with third parties for their use independent of authorized Penn alumni activities.
 - i) In addition, Penn may confirm school and year of graduation information with requesters, typically employers verifying resume information, unless the alumnus has requested a non-disclosure as a student or an alumnus.
 - c) *Assurances by Staff. Accessing Alumni Systems.* All Penn staff with access to alumni data system will agree in writing to abide by privacy preferences expressed by alumni and by Penn's privacy policy. See Appendix A for Staff Confidentiality Statement.
 - d) *Alumni Groups, Student Groups, and Volunteers.* Alumni clubs, affinity groups, student groups regional representatives, class representatives and volunteers are important partners of the University of Pennsylvania and play a vital role keeping alumni connected to Penn. As a result, Penn may provide such groups, based upon their presentation of the proposed use of data or the overall program, certain alumni data, consistent with privacy preferences expressed by alumni, provided that these organizations agree in writing in writing to specific privacy and security requirements found in Appendix B.
 - e) *Third Party Product and Service Offerings.* Penn, in coordination with Penn Alumni's Marketing and Sponsorship Committee, also partners with organizations that offer products and services that provide a significant and desired benefit to many Penn alumni. Penn provides such data for approved programming purposes, consistent with privacy preferences expressed by alumni and provided that these organizations agree in writing to specific privacy and security requirements approved by the Office of General Counsel and the Chief Privacy Officer.
 - f) *Law-related Disclosures.* Penn may disclose your personal information as required by law in connection with judicial or administrative proceedings or if, in the sole discretion of Penn, disclosure is necessary to protect the institution.

¹ The term "authorized users" has different meanings in different Schools and Centers. In general, authorized users are alumni who are registered to use the applicable online applications such as alumni themselves, and students currently registered at Penn. For more information about who is authorized to access online applications, please contact the relevant Alumni Office from your School or the Office of Development and Alumni Relations.

- g) *Emergency Circumstances.* Penn may disclose your personal information if, in Penn's sole judgment, such disclosure is necessary to protect the health, safety or property of any person.

IV) User Control – Opting Out of Communications.

- a) *Website Opt-Out Controls.* Penn provides alumni a clear and user-friendly way to opt-out of receiving communications from third parties or from Penn itself for most programs by visiting <http://www.alumni.upenn.edu/optout>. Penn's opt-out programs, depending upon the program, are required by law or as Penn deems appropriate.
- b) *Effective Date.* Opt-out preferences will be processed immediately and will be effective, at the latest, within 90 days of receipt.
- c) *Limitations on Impact of Opt-Out:*
 - i) The opt-out website is specific to product offerings associated only with Penn's specific programs. Please be aware that third parties may have received your name from another source. For assistance with removing your name from all marketing lists from a particular organization, you should contact that organization directly.
 - ii) The opt-out selections for the MBNA program apply to each alumnus in his or her role as an alumnus. If an alumnus also becomes a student, staff or faculty member again at Penn, the appropriate opt-out website is <http://www.upenn.edu/optout>. Alumni may also contact MBNA directly at 800-421-2110 to speak to a customer service representative.
- d) *Duration of Opt Out.* Opt-out choices will be unlimited in duration, unless the alumnus requests that the duration be limited.
- e) *Changing Preferences.* Opt-out decisions may be reversed by alumni at any time, except to the extent that Penn has relied upon a previous user preference.
- f) *Communicating Opt-Outs and Impacts.* Penn alumni may express privacy preferences to Penn centrally or to individual clubs or organizations.
 - i) Penn-managed Opt-Out Program. Alumni may opt-out of various types of communications by setting options at <http://www.alumni.upenn.edu/optout>. Alternatively, alumni may opt-out by phone (215-898-8136) or by e-mail (record@ben.dev.upenn.edu).
 - ii) Alumni Groups, Student Groups, and Volunteers. Using the Penn-managed opt-out system does not necessarily impact communications from alumni clubs, affinity groups, and regional representatives – particularly those that maintain their own databases. Alumni who wish to stop receiving communications from these groups are advised to communicate their opt-out preferences directly to the relevant club / group / representatives.

V) User Control – Updating Records in Online Communities

- a) *Introduction to Penn Online Communities.* Penn's Online Communities enable Penn's broad alumni population to develop and continue professional and social relationships long after they have left Penn.
- b) *Limitation on Sharing.* Information about the Penn alumni through such services is available only to authorized members of the Penn community² and to Penn's alumni systems vendors, which are contractually required to maintain strict confidentiality requirements.
- c) *User Controls.* Alumni have the ability to suppress all or part of their listings in all relevant alumni online networking services.

VI) Security. Penn recognizes the importance of safeguarding personal information. Penn has put in place appropriate physical, technical and administrative procedures to minimize the risk of

² See Footnote 1.

unauthorized access to alumni data, to maintain data accuracy and to ensure the appropriate use of information.

- VII) Privacy Inquiries. If alumni or others have concerns or questions about Penn's partnerships with outside organizations, they may contact alumni@ben.dev.upenn.edu. If questions or concerns arise regarding specific opt-out options, alumni may contact record@ben.dev.upenn.edu. Questions about Penn's privacy program overall may be sent to privacy@pobox.upenn.edu.
- VIII) Changes. Penn retains the right to change this Privacy Policy. We will post changes to this page in a prompt manner. This statement is effective as of _____.
- IX) External Links. External Links to independent third-parties are provided as a courtesy and do not constitute and endorsement or sponsorship of the third parties that operate those websites. While we try to link only to sites and services that share our high standards and respect for privacy, Penn is not responsible for the policies and content of those sites. Users should contact the coordinator of the particular site with any questions about those sites.

University of Pennsylvania
Confidentiality / Non-Disclosure Statement – Alumni Data
Office of Development and Alumni Relations

For all Staff and/or Student Workers

As a member of the staff of the University of Pennsylvania's Office of Development and Alumni Relations, I may be provided with access to personal, proprietary, and/or otherwise confidential data. This can include personal or business information about Penn alumni and other valued constituents of the Penn community.

As a member of this office, I agree to maintain in strictest confidence the data to which I have access, both during and after my employment. I will not share any alumni data with others who are not authorized to view such data. I will keep my pennkey and pennkey password secure. I will not share my pennkey password information with anyone at any time. I will not allow anyone to access Atlas using my password at any time, either during or after my employment with this office. When disposing of confidential data, I will ensure that such data is shredded or otherwise disposed of in a secure and complete fashion.

I agree to exercise reasonable care when transmitting sensitive information such as social security numbers, ID numbers, credit card information, donations, and other sensitive data. This type of information should not be shared through fax or email and every effort should be made to share this information only when necessary and in the most secure form that is available.

I agree to use my access to confidential data only for Penn alumni-oriented outreach, service, development, and community-building programs. I understand that the use of confidential data for personal purposes is prohibited.

I agree to abide by the University of Pennsylvania Policy on the Privacy of Alumni Data attached hereto.

I agree to honor the privacy preferences expressed by alumni in Penn's alumni data information system.

In the event that alumni, friends or other individuals request information, such as an address or telephone number of a Penn alumna/us, or wish to have a message communicated, Penn may act on behalf of the requestor by mailing or e-mailing a request. I will not provide the information directly to the requestor. Penn alumni who request information can also be directed to Penn's Alumni Online Community <http://www.alumniconnections.com/olc/pub/UPN/> where other alumni have posted contact information that they wish to share.

I will use discretion with regard to sharing gift or pledge information with the donor making the pledge or gift or their representative. I will take reasonable steps to verify the identity and authority of the person asking for such information.

Penn will share limited demographic data only in select circumstances that provide a significant and desired benefit to many Penn alumni. In any such program, Penn alumni must be able to request to opt-out of receiving such communications. Penn's opt-out program is centrally managed at <http://www.alumni.upenn.edu/optout>.

If I have any questions at any time regarding the disclosure of any confidential information, I will consult with the appropriate development or alumni officer before sharing any personal or financial information.

I understand that failure to comply with the above may result in sanctions, up to and including termination of employment and/ or expulsion, as appropriate according to University policies and practices.

I have read and agree to abide by the privacy guidelines as stated above.

Signature_____

Department_____

Email address_____

Date_____

Appendix B
University of Pennsylvania
Confidentiality / Non-Disclosure Statement – Alumni Data

For Alumni Groups, Student Groups, and Volunteers
(includes Alumni Clubs, Affinity Groups, Student Groups, Regional and Class Representatives, and Volunteers
Requesting Alumni Data)

Penn Alumni Groups, Student Groups, and Volunteers (hereafter “groups”) are important partners of the University of Pennsylvania and play a vital role keeping alumni connected to Penn. These groups vary significantly in the range and type of activity they are involved in, the number of alumni they reach, and the level of independence of their operation. Similarly, some groups make great use of Penn’s centrally managed data through the University alumni database; some develop their own databases and create their own alumni records given a high level of activity and individual focus for that group.

All groups must agree, however, on the importance of protecting the privacy and security of alumni data they themselves create or access from Penn. Individuals working for or on behalf of alumni groups, therefore, agree to provide the following information and abide by the following terms:

1. I request the following information about Penn alumni: _____

2. I will use this information for the following purpose(s) _____

3. I understand that I may utilize data about Penn alumni only for the purposes described above.
4. I understand that any data furnished from Penn will not include records of alumni who have opted out of sharing data with alumni groups, affinity groups, student groups and regional representatives.
5. I agree to provide in all communications with alumni a description of an effective opt-out program in one of the following two ways:
 - a. I may advertise Penn’s centrally managed opt-out program available at <http://www.alumni.upenn.edu/optout> provided that my future use of data is refreshed through the University’s alumni database (to apply recent privacy settings) before use.
 - b. I may continue to use my own alumni data without having to refresh through the University’s alumni database if the group I am representing offers its own opt-out program on its website and/or via e-mail address that is clear about the scope of the opt-out (i.e., pertaining to group communications only).
6. I will exercise reasonable care when handling and transmitting any sensitive alumni data. Every effort should be made to collect and share only necessary information and to maintain and share such data in a reasonably secure form.
7. If I have any questions regarding appropriate use, sharing and protection of alumni data, or questions regarding offering alumni privacy choices, I will contact [].

I have read and agree to abide by the privacy guidelines as stated above.

Requestor

Name _____
Signature _____
Organization _____
Affiliated School / Center _____
Email address _____
Telephone number _____
Date _____

Approved by Alumni / Development Staff

Name _____
Signature _____
Organization _____
Affiliated School / Center _____
Email address _____
Telephone number _____
Date _____