This standard details required content for site/application/service privacy notices and is intended to aid content owners and site managers as they think through their privacy practices. Privacy notices should address the following topics as appropriate:

- **Notice**
  Describe what user information is collected, how it is used, why it is collected, how long it is retained, and under what circumstances, if any, it may be disclosed. Describe how users will be notified of changes to privacy practices. Indicate the site(s) to which the notice applies. The notice should state that different units at the university may collect and use user information in different ways and that users should review the privacy notices for the particular sites they visit. It should also state that Indiana University is not responsible for the privacy practices of sites outside the scope of this policy.

- **Choice**
  Describe how a site user implicitly or explicitly indicates consent to the
collection, use, and disclosure of his or her personal information, particularly if that information is to be used for a secondary purpose or disclosed to a third party. For actively collected information, state whether providing the requested information is voluntary, and indicate how not providing the requested information (or subsequently asking that the information be removed) will affect the delivery of products or services for which the information is needed.

- **Access**
  Site owners and content managers should describe whether/how an individual may access his or her personal information to review or change that information. For actively collected information, state that a user may contact the site's designee to obtain, modify, or delete information the user has provided, and provide contact information for doing so. Site owners and content managers should make a copy of a user's information available to the user upon his or her request.

- **Redress**
  Site owners and content managers should describe procedures for monitoring compliance with stated practices and for resolving users' complaints and disputes regarding the site's use and disclosure of personal information.

- **Security**
  Site owners and content managers should describe how personal information collected by or provided to the site is secured.

- **Privacy Expectations**
  All site privacy notices developed pursuant to this policy should include the following statement:

  *Due to the rapidly evolving nature of information technologies, no transmission of information over the Internet can be guaranteed to be completely secure. While Indiana University is committed to protecting user privacy, IU cannot guarantee the security of any information users transmit to university sites, and users do so at their own risk.*

- **Links to non-university sites**
  All privacy notices developed pursuant to this policy should include the following statement:

  *Indiana University is not responsible for the availability, content, or privacy practices of non-university sites. Non-university sites are not bound by this site privacy notice policy and may or may not have their own privacy policies.*

- **Declaration of Third-Party Data Management Responsibility**
  For situations in which a third party manages user data for a site branded with IU trademarks or otherwise can be attributed to IU:
• The third party’s privacy notice (if IU can reasonably influence it) should expressly identify the third party; indicate how the management of user data is shared; and (if applicable) state that, “Indiana University is not responsible for the privacy or security practices of this site.” AND
• Include a conspicuous click-wrap notice above (and in close proximity to) the button triggering the transfer.

See ISPP-24’s “Related Information” section for links to the:
  • Privacy Notice Generator; and
  • The Website Privacy Notices Policy FAQ

History

• Revised and moved from the underlying policy ISPP-24 into this standard: December 07, 2016
• Updated: August 17, 2011
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