

Frostburg State University

Privacy Statement

I. Introduction

The Frostburg State University (“University” or “We”) Privacy Statement Notice (“Notice”) provides information about how the University protects, maintains, collects, processes, and discloses information through online and offline Systems of Record. This Notice describes the types of information We may collect from/about you when you physically visit our property, visit our official website, or connect to a System of Record operated by us or one of our authorized third-party providers.

Please read this Notice carefully. This [Notice](#) and the institution’s Privacy Policy (Link to Frostburg State University Privacy Policy.pdf document) may change from time to time. You hereby agree that it is your responsibility to monitor the institution’s Privacy Policy and this Notice for changes. Your continued affiliation with the institution and use of institutional property and information systems is deemed to be acceptance of those changes.

II. Important Terms

For purposes of this Notice the following terms have the meaning provided:

“Data Subject” means the individual to whom a particular PII Record relates.

“Legitimate Basis or Legitimate Business Use” means that the University has a contractual need, public interest purpose, business purpose, or other legal obligation to retain and/or process information or data in the University’s possession, or a Data Subject has consented to the retaining and/or processing of information or data in the University’s possession.

“Personally Identifiable Information” (PII) includes any information that, taken alone or in combination with other information, enables the identification of an individual, including:

1. a full name;
2. a Social Security number;
3. a driver’s license number, state identification card number, or other individual identification number;
4. a passport number;
5. biometric information including an individual's physiological, biological, or behavioral characteristics, including an individual's deoxyribonucleic acid (DNA),

that can be used, singly or in combination with each other or with other identifying data, to establish individual identity;

6. geolocation data;
7. Internet or other electronic network activity information, including browsing history, search history, and information regarding an individual's interaction with an Internet website, application, or advertisement; and
8. a financial or other account number, a credit card number, or a debit card number that, in combination with any required security code, access code, or password, would permit access to an individual's account.

Personally Identifiable Information does not include data rendered anonymous through the use of techniques including obfuscation, delegation and redaction, and encryption, so that the individual is no longer identifiable.

“Records” means information that is inscribed on a tangible medium or that is stored in an electronic or other medium and is retrievable in perceivable form.

“System” means an electronic or other physical medium maintained or administered by the University and used on a procedural basis to store information in the ordinary course of the business of the University.

“System of Record” means a System that has been designated by the University as a System of Record. Determination that a System is a System of Record is based on the following criteria:

- the risk posed to individuals by the Personally Identifiable Information processed and stored on the System;
- the relationship of the System to the overall function of the University; and
- the technical and financial feasibility of implementing privacy controls and services within the System.

III. Information We Collect / Systems of Record

Frostburg State University defines its Systems of Record (SoR) as structured information systems that require strong protection of confidentiality, integrity, and availability that widely support the campus community.

The university has made available the contact details for data subjects/individuals to submit requests regarding data privacy, along with the processes to manage such inquiries.

As required by the Maryland Higher Education Privacy Law, the university has designated the following information systems as “Systems of Record”:

- Human Resources Information System: used for employment records.
- Student Information System: used for student records
- Financials Information System: used for financial records

- Alumni / Donor Information System: used for alumni and donor records
- Admissions / Recruitment System: used for student relationship management

IV. Your Rights Under Maryland Law:

Under Maryland law you have certain rights when it comes to your data. To learn more about these rights under Maryland law please review the [Maryland Higher Education Privacy Law](#). As outlined in the law, you have the following rights in institutional Systems of Record.

- Access – You have the right to request any personally identifiable information about you in our Systems of Record.
- Correction – If you believe that one or more data elements about you in one of our systems of record is incorrect, you have the right to request for the record to be corrected.
 - Please note: In the event that a request for correction is denied, you have the right to dispute the denial and to have that dispute produced if the information is ever requested by a third party.
- Deletion – You have the right to request that We delete your PII from a University System of Record.
 - Please note: Only information that is being held without a Legitimate Basis for holding or processing can be deleted. Information that must be held for technical, legal, or financial reasons also cannot be deleted.
- Sharing – You have the right to ask if your PII was or is currently being shared with a third party. The institution may share information with third parties based on a Legitimate Basis or with your consent. If your information is being shared by consent, you have the right to know how your consent was gathered, and you also have the right to revoke your consent.

V. Making a Privacy Request

To make a privacy request, please click [here](#)

Please note: For security reasons, any privacy request MUST be made by the Data Subject and will be reviewed and verified by the University. At this time, the University does not have the capability to process requests from third parties such as data removal services. Any request not directly made by the Data Subject will be denied.

VI. Permitted / Required Uses and Disclosures

Some Personally Identifiable Information may be subject to disclosure under the Maryland Public Information Act or other federal and state laws or regulations.

The University reserves the right to access and use Personally Identifiable Information in its sole discretion when University staff believe there is a risk to safety or to investigate actual or suspected instances of misconduct or risk to the University, students, faculty, staff, and third parties, subject to applicable law and University policy.

The University reserves the right to disclose any relevant information, including PII, when required by law enforcement or to comply with a court order, law, or legal process, including responding to a government or regulatory request.

The University may disclose aggregated, disaggregated, anonymized, or de-identified personal information about our community.

VII. Other Privacy Laws Related to Your Information

In addition to the Maryland Higher Education Privacy Law, the following state, national and international laws may apply to your information. The following links will take you to information about each of these laws, including how they may apply to information held by the institution.

- [FERPA – Family Educational Rights and Privacy Act](#)
- [HIPAA – Health Insurance Portability and Accountability Act](#)
- [COPPA – Children's Online Privacy Protection Rule](#)
- [GLBA – Gramm-Leach-Bliley Act](#)
- [GDPR – Europe's General Data Protection Regulation](#)

VIII. Automated Collection:

The University may use automated collection technologies such as “Cookies” or “Web Beacons” to collect some or all of the PII listed above. Please visit allaboutcookies.org for information on how [browser cookies](#) and [web beacons](#) work.

Cookies may also be used by organizations other than Frostburg State University. Because Frostburg State University does not control these other organizations, you should review their policies. Users may disable cookies through their individual browser configuration. However, if you do not accept cookies, you may not be able to access or use some portions of the University's digital content or technology network.

IX. Additional Resources:

Other ways to manage your University Information:

- Update/correct academic records: see options on the [Registrar's Office webpage](#).
- Update employee personal information: access links from the [Faculty/Staff portal webpage](#)
- See [FERPA Annual Notification of Rights](#)

X. Contact Information:

To ask questions about the University's Privacy Notice, contact the Help Desk at:

Phone: 301.687.7777 x7777

Location: Gira Center Room 123

Email: helpdesk@frostburg.edu

Revision History

Version Number	Date	Author	Description
1.0	June 2024	Lori Bennett	Initial Document
1.1	September 2024	Lori Bennett	Updated links
1.2	September 2024	Lori Bennett	Approved 9/30/2024