FOUNDED IN SAN FRANCISCO 1929 BY ARTISTS FOR ARTISTS

# **Privacy Policy**

Academy of Art University seeks to protect your personal and private information. Any such information you submit on this Website or via other channels (phone, email, mail, printed forms, mobile app) is for official University use only. Please review the Privacy Policy below to learn about how the University collects, uses, and protects the information you share with us and your choices for managing your Personal Information. By using this Site, you agree to the Policy, which is subject to our <a href="Terms of Service">Terms of Service</a>. Please see the <a href="Glossary">Glossary</a> for definitions and explanations of terms used in this Privacy Policy.

### **Managing Your Privacy and Personal Information**

You may make the following requests by emailing us at <a href="mailto:privacy@academyart.edu">privacy@academyart.edu</a> or by calling us toll free at 1-800-544-2787 (US only) or at (415) 274-2200:

- opt out of being contacted by the Academy
- have us delete your Personal Information from our records
- receive a copy of your Personal Information from our records (California, EU, and Brazil residents only)

## **Verifying Your Identity**

Once submitted, all requesters will complete an identity verification process before we take any action involving your personal data. This process may involve signing and submitting an affidavit to certify that you are making a request related to your own data and uploading a photo of a government-issued ID to confirm residency. A data privacy administrator may also reach out to you by phone to ask questions in order to verify your identity. For access requests, we may need to verify your California or European Union residency before releasing any Personal Information to you.

We will respond to your request within 30 days, unless additional time is required. If an extension is necessary, we will inform you within 30 days of the receipt of your request and provide reasons for the delay. In such cases, the Academy may take up to 90 days to respond to your request. As required by law, the University will honor verified requests.

When the University receives a request for access to Personal Information and a request for the deletion of Personal Information simultaneously from the same individual, we will first address the request for access. When the access request is complete, we will then begin the process of deletion, which may take up to 30 days.

Requesters who do not provide the information necessary to verify their identity and residency, will have their requests canceled 15 days after the Academy issues the request for the verification information. Those requesters will be informed of the cancelation and are welcome to submit new requests at any time.

If we are unable to verify your identity, Academy of Art University will not disclose any Personal Information to you and will inform you that we cannot process the request. In the event that your request is denied, we will inform you of the reason for the denial. You may appeal a request denial

by sending an email to <a href="mailto:privacy@academyart.edu">privacy@academyart.edu</a>. Please include your full name and the reason why you disagree with the denial, and we will review your case and respond to you with our final decision within 15 days.

# **Opt Out of Unsolicited Contact/Do Not Contact Requests**

The Academy will honor requests to stop our sending of unsolicited communication to you via mail, phone, email, and text/SMS.

# **Deletion of Personal Information Requests**

Upon request, the University will delete any Personal Information collected that is not necessary for us to maintain for the following reasons:

- to complete the transaction for which the Personal Information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer
- to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity
- to debug to identify and repair errors that impair existing intended functionality
- to exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law
- to comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code
- to engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent
- to enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business
- to comply with a legal obligation
- to address any complaints regarding our programs and services

In most cases, this means that we are required to maintain the Personal Information of enrolled students and alumni but will delete the Personal Information of prospective students.

# **Access to Personal Information Requests**

California and European Union residents may request to receive a copy of their Personal Information collected and maintained by Academy of Art University. Upon verification of the requester's identity and residency, we will provide the information free of charge in a written and readily useable format. Such requests can be made by the same individual up to two times per year.

#### **Information Collection & Use**

Any information that you submit to Academy of Art University will be used exclusively for legitimate business purposes by the University itself or by those designated as its agents. We may collect this information through our website, over the phone, by mail or email, via a mobile application, or on printed forms.

The Academy will never sell your information, including Personal Information, to any third party. The California Consumer Privacy Act of 2018 (CCPA) and the General Data Protection Regulation (GDPR) give California and European Union residents specific rights to opt out of the sale of their Personal

Information; however, since we do not sell Personal Information, the Policy does not specifically cover those rights.

Below is a description of the types of Personal Information (PI) that we collect and share with authorized service providers and government agencies as well as our legal basis for processing your PI:

## **Application Information**

To evaluate candidates for admission, provide requested services, and create, maintain, and secure online accounts with Academy of Art University, we collect applicant PI such as names, AAU student ID number, citizenship status, mailing address, phone number, email address, password for application portal, parent/guardian contact information, date of birth, social security number, military status, gender, ethnicity, race, educational history, and credit card information. This information is securely shared with database providers for record keeping purposes. Please note that when an applicant completes the first page of our online application and clicks the Next Page button, the Personal Information on that form is shared with Academy of Art University.

#### **Enrollment Information**

In order to enroll students in the University, we collect names, AAU student ID number, email address, phone number, mailing address, program, initials, and signature. PI collected during the enrollment process is used to execute an enrollment agreement (contract) with a prospective student. This information is securely shared with database providers for record keeping purposes and may be shared with government agencies and independent auditors.

#### **Financial Aid Information**

To evaluate whether an applicant is eligible to receive financial aid, we collect names, AAU student ID number, mailing address, social security number, date of birth, phone number, driver's license number, driver's license state, email address, citizenship, alien registration number, marital status, state of residence, gender, criminal convictions, educational information, income tax return information, military status, parent/guardian information, emancipated minor information, unaccompanied youth information, household information, signature, parent/guardian signature, and loan information. This information is securely shared with database providers for record keeping purposes and may be shared with financial services providers, government agencies, and independent auditors.

# **Veterans' Information**

To facilitate students' VA enrollment certification, we collect names, AAU student ID number, VA file number, mailing address, social security number, type of training, parent school letter status, Yellow Ribbon Recipient status, zip code, and signature. This information is securely shared with database providers for record keeping purposes and may be shared with government agencies and independent auditors.

#### **International Student Information**

As a legal requirement and to provide services for international students, we collect names, AAU student ID number, contact information, date of birth, demographic information, degree level, major, reason for requesting a verification letter, travel details, transfer information, passport information, financial information. This information is securely shared with database providers for record keeping purposes and may be shared with government agencies and independent auditors.

#### **Registration Information**

To register current and prospective students in courses, we collect names, AAU student ID number, date of birth, birth gender, addresses, phone numbers, email addresses, medical accommodation, medical documentation, gender identity, health insurance policy number and provider, emergency contacts information, and credit card/debit card information. This information is securely shared with database providers for record keeping purposes and may be shared with financial services providers, government agencies, and independent auditors.

## **Housing Information**

To provide prospective and current students with housing and meal plans, we collect names, AAU student ID number, date of birth, birth gender, addresses, phone numbers, email addresses, medical accommodation, medical documentation, gender identity, health insurance policy number and provider, emergency contacts' phone number and address, and credit card/debit card information. This information is securely shared with database providers for record keeping purposes and may be shared with government agencies and independent auditors.

#### **Online Education LMS Profile and Course Access**

To provide online courses and academic status information to current students, we collect names, AAU student ID number, photos, username, phone number, location, website, social media links, portfolio, email addresses, major, biography, resume, grades, attendance, and any PI provided by a student in an online class. This information is securely shared with learning management system and database providers for record keeping purposes and may be shared with government agencies and independent auditors.

Any information that enrolled students choose to share on an online class discussion board or in any online discussion activity for onsite classes or otherwise may be viewed by other students and faculty, unless the instructor has made the discussion topic private. Please exercise caution when posting your Personal Information in these areas.

#### **Contact Information**

To provide consumers with information about our educational programs and services, we collect names, email address, country, highest level of education, year of graduation from high school, mailing address, city, state, zip code, phone number, and military status. This information is securely shared with database providers for record keeping purposes.

#### **Student Services Information**

To provide students with technical, academic, and career services assistance, we collect names, AAU student ID number, phone numbers, email addresses, degree program, courses, instructor's name, and first language. This information is securely shared with database providers for record keeping purposes.

#### **Athletics Information**

For recruiting purposes, we collect names, address, email address, phone numbers, social media links, high school graduation year, date of birth, academic information (school, counselor, GPA, test scores, class rank, intended major) club information,

height, weight, jersey number, and positions. We may also collect parent and guardian information such as their contact information, occupation, and college attended. To connect fans to Academy of Art University Athletics' news, videos, and game day information, we may collect names, email addresses, and passwords through the Art U Athletics app. This information is securely shared with database providers for record keeping purposes and with app developers to provide AAU Athletics fans with information.

### **Alumni Placement/ Employment**

To comply with state and federal reporting requirements for placement (employment), we collect names, AAU student ID number, employment status, phone numbers, email addresses, program of study, degree earned, graduation date, graduation term, type of employment, employer name, job title, start date, end date, salary, signature, location, supervisor contact information, continuing education enrollment status, and IP address. This information is securely shared with database providers for record keeping purposes and may be shared with translation services, government agencies, and independent auditors.

### **Employee and Job Applicant Information**

For human resources, employment, and benefit administration purposes, we collect personal identifiers, financial, benefit selection, protected classification and diversity information, professional and employment history, education, health and safety, beneficiary, and emergency contact information.

#### **Website Traffic Statistics**

To gather usage statistics to improve our website experience, the Academy collects data on user activity on our website.

# **Sensory or Surveillance Information**

To protect the safety and security of our students, personnel, and facilities through video surveillance, the Academy collects sensory or surveillance data, including footage from campus video surveillance cameras.

#### Categories of Sources from which the Personal Information is Collected

Our primary source of PI is the consumer (prospective student, enrollee, or alumni). At times, for legitimate business purposes, we may collect PI from the following categories of sources:

- government agencies
- compliance service providers
- learning management system providers
- financial services providers
- other institutions
- cookie providers
- web analytics services

Our use of your Personal Information is necessary for us to inform you about our offerings and to provide our educational program and services to you through the Website or otherwise. If you choose not to provide your Personal Information or request that we delete or restrict the processing of your PI, we may not be able to enroll you in our educational programs and provide you with other services.

#### **Service Providers**

Our Service Providers receive only the information that is reasonably necessary and proportionate for them to perform services for Academy of Art University. Unless required by law, the Academy does not disclose your Personal Information to third-parties; however, the University reserves the right to make exceptions when it is believed that an emergency, illegal activity, or some other reasonable basis exists for providing such information to the appropriate authorities. These exceptions include:

- to comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities
- to cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate federal, state, or local law
- to exercise or defend legal claims

The Academy prohibits our Service Providers from retaining, using, disclosing, or selling any Personal Information that we share with them for any purpose other than performing the services specified in our contract with that entity.

#### **Data Security**

Your information is stored using appropriate physical, electronic, and managerial procedures and practices to protect data from unauthorized access, destruction, use, modification, or disclosure. The Academy follows industry standards and best practices in managing information and information systems and securing your Personal Information including:

- assessing the risk and magnitude of harm that could result from unauthorized access, use, disclosure, disruption, modification or destruction of information or information systems;
- determining the levels of information security appropriate to protect information and information systems;
- implementing policies and procedures to cost-effectively reduce risks to an acceptable level; and
- regularly testing and evaluation of information security controls and techniques to ensure effective implementation and improvement of such controls and techniques.

However, no data transmission over the Internet is completely secure. While the University strives to protect information transmitted on or through the Website, we cannot and do not guarantee or warrant the security of any information that you transmit on or through the Site, and you do so at your own risk.

#### **Automated Decisions**

Certain business operations at Academy of Art University, particularly in financial aid processing and marketing do have automation that may involve Personal Information. This automation is to help reduce manual effort in processing information to accomplish business tasks.

## **Other Websites**

We may link to or offer some of our services via third party websites or applications that have their own privacy policies. The Academy is not responsible for the practices of these third parties and encourages you to review their privacy policies before using these other sites.

#### **Transfers of Data to the United States**

Certain processing, such as payment information may cross international borders for transatlantic payments. Academy of Art University does not internally transfer any data across international borders. Privacy policies for the payment gateways we use are available from our Service Providers:

- CyberSource: https://www.cybersource.com/privacy/
- Flywire: <a href="https://www.flywire.com/privacy/">https://www.flywire.com/privacy/</a>

- Total System Services: <a href="https://www.tsys.com/privacy-policy.html">https://www.tsys.com/privacy-policy.html</a>
- TrustCommerce: https://www.trustcommerce.com/privacy-policy/

#### **Record Maintenance**

Academy of Art University keeps your Personal Information for the time needed to fulfill our contracts (enrollment agreements) with customers and to satisfy any legal, accounting, and reporting requirements. The criteria used to determine our record maintenance schedule is based on federal and state requirements, the sensitivity of the information, the potential risk of harm from the misuse of the information, and whether the information is essential for our business purposes.

# **Children's Privacy Statement**

Academy of Art University does not knowingly collect Personal Information from children under the age of 13. If the University becomes aware that a child under the age of 13 has submitted Personal Information, the University will delete such information from its records immediately.

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

The Family Educational Rights and Privacy Act (FERPA) affords eligible students certain rights with respect to their education records. (An "eligible student" under FERPA is a student who is 18 years of age or older or who attends a postsecondary institution at any age.) These rights include:

Right to Inspect and Review the Student's Education Records within 45 Days after the Day Academy of Art University Receives a Request for Access

Students should submit to the Office of the Registrar written requests that identify the record(s) they wish to inspect. The Registrar will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the Office of the Registrar, the Registrar shall advise the student of the correct official to whom the request should be addressed.

Right to Request the Amendment of the Student's Education Records that the Student Believes

Are Inaccurate, Misleading, or Otherwise in Violation of the Student's Privacy Rights under

FERPA

Students may ask Academy of Art University to amend a record that they believe is inaccurate or misleading. They should write the Academy of Art University official responsible for the record, clearly identify the part of the record they want changed and specify why it is inaccurate or misleading. If Academy of Art University decides not to amend the record as requested by the student, Academy of Art University will notify the student of the decision and advise the students of their rights to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

Right to Provide Written Consent Before the University Discloses Personally Identifiable
Information from the Student's Education Records, Except to the Extent that FERPA Authorizes
Disclosure without Consent

The University discloses education records without a student's prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests. A school official is a person employed by Academy of Art University in an administrative, supervisory, academic, research, or support staff position (including law enforcement unit personnel and health staff); a person serving on the board of trustees; or a student serving on an official committee, such as a disciplinary or grievance committee. A school official also may include a volunteer or contractor outside of Academy of Art University who performs an institutional

service of function for which the school would otherwise use its own employees and who is under the direct control of the school with respect to the use and maintenance of personally identifiable information from education records, such as an attorney, auditor, or collection agent or a student volunteering to assist another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for Academy of Art University.

FERPA permits the disclosure of PII from students' education records, without consent of the student, if the disclosure meets certain conditions found in § 99.31 of the FERPA regulations. Except for disclosures to school officials, disclosures related to some judicial orders or lawfully issued subpoenas, disclosures of directory information, and disclosures to the student, § 99.32 of FERPA regulations requires the institution to record the disclosure. Eligible students have a right to inspect and review the record of disclosures. A postsecondary institution may disclose PII from the education records without obtaining prior written consent of the student in the following cases:

- To other school officials, including teachers, within Academy of Art University whom the school has determined to have legitimate educational interests. This includes contractors, consultants, volunteers, or other parties to whom the school has outsourced institutional services or functions, provided that the conditions listed in § 99.31(a)(1)(i)(B)(1) (a)(1)(i)(B)(3) are met. (§ 99.31(a)(1))
- To officials of another school where the student seeks or intends to enroll, or where the student is already enrolled if the disclosure is for purposes related to the student's enrollment or transfer, subject to the requirements of § 99.34. (§ 99.31(a)(2))
- To authorized representatives of the U. S. Comptroller General, the U.S. Attorney General, the U.S. Secretary of Education, or State and local educational authorities, such as a State postsecondary authority that is responsible for supervising the university's State-supported education programs. Disclosures under this provision may be made, subject to the requirements of §99.35, in connection with an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs. These entities may make further disclosures of PII to outside entities that are designated by them as their authorized representatives to conduct any audit, evaluation, or enforcement or compliance activity on their behalf. (§§ 99.31(a)(3) and 99.35)
- In connection with financial aid for which the student has applied or which the student has received, if the information is necessary to determine eligibility for the aid, determine the amount of the aid, determine the conditions of the aid, or enforce the terms and conditions of the aid. (§ 99.31(a)(4))
- To organizations conducting studies for, or on behalf of, the school, in order to: (a) develop, validate, or administer predictive tests; (b) administer student aid programs; or (c) improve instruction. (§ 99.31(a)(6))
- To accrediting organizations to carry out their accrediting functions. (§ 99.31(a)(7))
- To parents of an eligible student if the student is a dependent for IRS tax purposes. (§ 99.31(a)(8))
- To comply with a judicial order or lawfully issued subpoena. (§ 99.31(a)(9))
- To appropriate officials in connection with a health or safety emergency, subject to § 99.36. (§ 99.31(a)(10))
- To disclose education records without consent to officials of another school in which a student seeks or intends to enroll upon request
- To disclose information the school has designated as "Directory Information" under § 99.37. (§ 99.31(a)(11))

- To a victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense, subject to the requirements of § 99.39. The disclosure may only include the final results of the disciplinary proceeding with respect to that alleged crime or offense, regardless of the finding. (§ 99.31(a)(13))
- To the general public, the final results of a disciplinary proceeding, subject to the requirements of § 99.39, if the school determines the student is an alleged perpetrator of a crime of violence or non-forcible sex offense and the student has committed a violation of the school's rules or policies with respect to the allegation made against him or her. (§ 99.31(a)(14))
- To parents of a student regarding the student's violation of any Federal, State, or local law, or of any rule or policy of the school, governing the use or possession of alcohol or a controlled substance if the school determines the student committed a disciplinary violation and the student is under the age of 21. (§99.31(a)(15))

Right to File a Complaint with the U.S. Department of Education Concerning Alleged Failures by the Academy of Art University to Comply with the Requirements of FERPA

The name and address of the office that administers FERPA is:

Family Policy Compliance Office U.S. Department of Education 400 Maryland Avenue, SW Washington, DC 20202-4650

Phone: 1-202-263-0282 Fax: 1-202-260-9002 Email: <u>ferpa@ed.gov</u>

Web: https://www.ed.gov/policy/gen/reg/ferpa/index.html

FERPA permits the disclosure of designated "Directory Information" without a student's written consent, unless a student provides written notification to the Office of the Registrar that s/he does not want "Directory Information" released. Academy of Art University designates the following as public or "Directory Information": student's name, student picture, e-mail address, degree sought, expected date of graduation, school or college, major field, periods of enrollment, full- or part-time enrollment status, degrees and awards received and dates of conferral, the previous educational agency or institution attended, and participation in officially recognized activities and sports.

A student who wishes to allow another person, such as a parent or guardian, to have continuous access to the student's educational records must make written notification to the Office of the Registrar, 79 New Montgomery Street, San Francisco, CA 94105. Once filed, this request becomes a permanent part of the student's record until the student instructs Academy of Art University, in writing, to have the request removed.

# Gramm-Leach-Bliley Act (GLBA)

The federal Gramm-Leach-Bliley Act (GLBA) regulates the privacy and security of personal financial information, referred to as Nonpublic Personal Information (NPI). NPI is any personally identifiable financial information that a financial institution collects about an individual in connection with providing a financial product or service, unless that information is otherwise publicly available.

Since Academy of Art University conducts financial activities such as lending and providing financial advisory services, we are considered a financial institution under the GLBA; therefore, federal law requires us to disclose to you how we collect, share, and protect your information in this Policy. Please

review the Information Collection & Use section and the Data Security section of our Privacy Policy to learn how we process and safeguard your NPI.

# California Consumer Privacy Act (CCPA) Rights Notice

Under the California Consumer Privacy Act of 2018 (CCPA), California residents have the rights listed below.

# Right to Know About Personal Information Collected, Disclosed, or Sold

You have the right to request that Academy of Art University disclose the Personal Information that we collect, use, and disclose. We do not sell Personal Information. You can request the following information about you that we have collected in past 12 months:

- specific pieces of information
- categories of Personal Information
- categories of sources from which we collected Personal Information
- categories of third parties with whom we share Personal Information
- business or commercial purpose for collecting Personal Information

# Right to Request Deletion of Personal Information

You have the right to request that we delete the Personal Information that we collect from and about you that we are not required by law to maintain.

## Right to Opt-Out of the Sale of Personal Information

Academy of Art University does not sell Personal Information.

# Right to Nondiscrimination

You are entitled to exercise the rights described above free from discrimination. This means that we will not penalize you for exercising your rights by taking actions such as:

- denying you goods or services
- increasing the price/rate of goods or services
- decreasing our service quality
- suggesting that we may penalize you as described above for exercising your rights

You may exercise your California privacy rights to access and request deletion your Personal Information by submitting a verifiable consumer request by:

- email us at <a href="mailto:privacy@academyart.edu">privacy@academyart.edu</a>
- by calling us toll free at 1-800-544-2787 (US only)

To learn more about the process we use to verify consumer requests, please refer to the **Verifying Your Identity section of this Policy**. If you use an authorized agent to exercise your rights, Academy of Art University may require that you:

- provide the authorized agent with written permission, designating them to submit the request on your behalf
- verify your own identity directly with the Academy
- confirm directly with the University that you authorized

The Academy reserves the right to deny a request from an agent that does not submit proof of authorization to act on your behalf.

# **General Data Protection Regulation (GDPR) Rights Notice**

Under the General Data Protection Regulation (GDPR), consumers located in the European Economic Area (European Union, Norway, Liechtenstein, and Iceland), have the rights listed below:

# Right to Access Personal Information in a Portable Format

You can request to review the Personal Information that we retain about you and receive a copy of it in a commonly used electronic format.

### Right to Correct Your Personal Information

You can ask the University to make corrections to any information that we maintain about you when you believe it to be incorrect.

# Right to Restrict Our Processing Your Personal Information

You can request that we restrict the processing of your Personal Information, including sending you communications that may be considered direct-marketing materials.

## Right to Deletion of Your Personal Information

You can request that we delete your Personal Information upon request or have your PI automatically deleted when we are no longer required to maintain it.

# Right to Object to Automated Decision-Making and Profiling

You can request not to be subject to decisions that are based solely on the automated processing of your Personal Information.

#### Right to Withdraw Consent

You may withdraw your consent to allow us to process your Personal Information.

# Right to Complain to a Supervisory Authority

If you feel that your rights have not been recognized by the Academy or are unsatisfied with our response, you have the right to complain to or seek advice from a supervisory authority. Click here for a list of Supervisory Authorities.

You may exercise your GDPR rights by submitting a verifiable consumer request

- By calling us toll free at 1-800-544-2787 (US only) or at (415) 274-2200
- By emailing us at <u>privacy@academyart.edu</u>

### **General Data Protection law (LGPD) Notice**

Under the Lei Geral de Proteção de Dados No. 13.709/2018 or General Data Protection law (LGPD), consumers located in Brazil have the rights listed below.

# Right to Notice

Academy of Art University provides this Privacy Policy, explaining how your Personal Information is processed and shared.

## Right to Revoke Consent

You may withdraw your consent for us to maintain and process your Personal Information at any time

#### Right of Access

You can request confirmation that we process your Personal Information and ask to review the Personal Information that we retain about you and receive a copy that data as well as additional information about the processing of that data.

# Right to Correction/Rectification

You can have inaccurate Personal Information corrected and have incomplete Personal Information made complete.

## Right to Deletion

You can have personal data deleted in certain circumstances.

# Right to Restriction of Processing

You can have the additional processing of Personal Information temporarily prohibited while the accuracy or processing of the Personal Information is contested.

## Right to Data Portability

You can receive your Personal Information for the purpose of providing it to another controller.

### Right to Object

You can object, at any time that the processing of your Personal Information is unnecessary or excessive.

# Right to Avoid Automated Individual Decision-Making

You can object to your Personal Information being subjected to a decision based solely on automated processing, including profiling, that has legal or similar affect.

You may exercise your LGPD rights by submitting a verifiable consumer request

- By calling us toll free at 1-800-544-2787 (US only) or at (415) 274-2200
- By emailing us at <u>privacy@academyart.edu</u>

# **Privacy Policy Changes**

Academy of Art University may, at its sole and absolute discretion, change this Privacy Policy on an annual basis at a minimum. We will post the Privacy Policy as changed on the Website. Your continued use of the Website constitutes your agreement to the Privacy Policy as changed.

# **Questions about this Policy**

You may direct any questions or concerns regarding this Privacy Policy to us at <a href="mailto:privacy@academyart.edu">privacy@academyart.edu</a>.

Updated: 12/3/2020