

# UNIVERSITY OF PHOENIX PRIVACY POLICY

Updated March 1, 2024

The University of Phoenix, Inc. (“**University**,” “**us**,” or “**we**”) recognizes the importance of privacy. In this Privacy Policy (the “**Privacy Policy**”), we disclose our practices with respect to the Personal Information that we collect about individuals, as well as the choices and rights individuals have with respect to their Personal Information that we have collected. “**Personal Information**” or “**Personal Data**” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Certain states provide for different privacy rights and disclosures. These rights and disclosures are set forth in specific State-Related Addenda to this Privacy Policy.

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## 1. Scope

This Privacy Policy applies to Personal Information we collect from users of our Sites, Apps, Wi-Fi hotspots, and other online services, as well the Personal Information we collect about individuals, including current and prospective students, alumni, learners, visitors to our campuses, and others with whom we interact (e.g., Business-to-Business Representatives, as defined below), whether online, via phone, or offline in the course of providing our courses, programs, and services (collectively, our “**Services**”).

If you are an employee, contractor, or job applicant, then this Privacy Policy only applies to you when you are using our Services outside of those roles. If you are acting within your capacity as a current or former employee, contractor, or job applicant, then our collection and use of Personal Information is governed by our respective Employee Privacy, Contractor Privacy, or [Applicant Privacy](#) notices. If you are a former California employee, please contact us at [office.complianceuopx@phoenix.edu](mailto:office.complianceuopx@phoenix.edu) for a copy of our Employee Privacy notice.

Certain Services may be subject to additional privacy policies or privacy disclosures relating to the Services provided on the Site(s) (collectively, "**Additional Policies**"). In the event of a conflict between any Additional Policies and this Privacy Policy, the Additional Policies will take precedence.

**Student Educational Records.** If you become a student, your educational information that is part of your educational record with us is subject to the U.S. Federal Family Educational Rights and Privacy Act ("**FERPA**"), state laws, and the University's policies (collectively, "**Student Educational Records Requirements**"). In the event of any conflict between Student Educational Records Requirements and this Privacy Policy, the Student Educational Records Requirements will take precedence. Students have the right to limit access to their Student Educational Records and to request a copy of such records, as set forth in the University's [FERPA policy](#). You may also contact us via one of the below methods:

### **Mail**

University of Phoenix  
Attn: Registrar's Office  
4035 S. Riverpoint Parkway  
Phoenix, AZ 85040

### **Phone**

Admissions and Records Service Center: 800.866.3919.

## **2. Definitions**

As used in this Privacy Policy, the following terms have the following meanings:

**"Anonymized"** means information that has been de-identified so that it no longer reasonably identifies, relates to, describes, and is no longer reasonably capable of being

associated with, or linked, directly or indirectly, to an individual. Anonymized information is no longer Personal Information.

**"Apps"** means software which may be utilized on our Sites and downloaded to or accessed through our Services.

**"Business-to-Business Representatives"** means agents or representatives of other companies or associations who may be contacted as part of or in relation to our Services.

**"Education Partners"** means other companies or institutions who may participate in various University initiatives (e.g., companies making University courses, programs, or other product/service offerings available to their customers, employees, potential employers, institutions conducting academic research or providing academic reporting, etc.).

**"Service Providers"** means entities that the University contracts with to provide services on our behalf.

**"Site"** means any website owned or operated by the University, which links to or displays this Privacy Policy.

**"Social Network"** or **"Social Networking"** means various Internet communication technologies provided on the Services as well as on third-party social networking websites such as LinkedIn, Facebook, Twitter, etc., that facilitate conversation and interaction between people online and includes, but is not limited to, blogs, discussion forums, wikis, chat sessions, news groups, etc.

**"Social Network Content"** (or **"SNC"**) means user-generated content you consent to share via a Social Network and includes, but is not limited to, Personal Information, digital sounds, and pictures that you upload to a Social Network. It also includes your Personal Information that may be displayed on other users' Social Network pages.

### **3. Collection of Personal Information**

We collect information about you directly from you, from third parties, and automatically through your use of our Services or interactions with us. We may combine the information we collect from these various sources.

**Directly Collected Information.** We collect Personal Information that you provide to us voluntarily (online or offline), including when you: respond to an advertisement;

participate in a survey or a drawing; request information; apply for admission to the University; go to receive a photo ID for one of the University campuses; register for classes; apply for financial aid; order educational or other products and Services; set up a Social Network or other Site profile; use our Services or one of our Apps (e.g., for career resources, learning assessments, or other interactive tools); use the chat, SMS, or email functionality on our Site to contact us; or otherwise interact with us online or offline. The exact nature of the Personal Information may vary depending on the type of response or service requested, but could include name, contact details, date of birth, education history, financial information, employment status, photos, interests, demographic information, and other information.

**Automatically Collected Information.** The Services may have and use cookies, pixels, third-party tags, scripts, log files, and other means to automatically collect information about the use of our Services and services, including (but not limited to): device information such as your hardware model, operating system, IP address, and unique device identifiers; collection date; publisher name; connection speed; day of week and time of day; language settings; country, state, city (relating to IP address, if available); domain (e.g., .com, .net, .mil, .org, .edu, etc.); web pages viewed; and email clicks or other actions taken. See the “Cookies and Similar Technologies” section below for more information. This information that we collect automatically may be linked with Personal Information to accomplish the purposes described in this Privacy Policy. In addition, we may use CCTV and other security monitoring to secure our premises, which may lead to the collection of Personal Information about visitors to our campuses. Further, when you call us or communicate with us through our Site by using our chat, SMS, or email functionality, we may record such calls and communications for quality and training purposes.

**Information Collected from Other Sources.** We may also obtain Personal Information from Education Partners, Service Providers, and publicly available sources, which may be combined with other Personal Information we have collected. For example, we may receive Personal Information about you from educational institutions which you have attended; financial institutions (e.g., related to student loans); government entities (e.g., related to education grants); employers (e.g., related to education or career initiatives); third-party platforms or accounts that you connect to or integrate with one or more of our Services; Service Providers that we work with to verify, update, or append data to the information that we have otherwise collected about you and to identify prospective students or other individuals who may be interested in our Services.

## **Categories of Personal Information Collected**

While the

- **Administering applications, enrollment, registration, and financial services: to**

- **Supporting our general business operations:** to support the administration of our general business, accounting, record keeping, and legal functions, including to analyze operational and business results and risks, to collect outstanding amounts owed, and to maintain business and Student Educational Records

**Anonymized information.** We may also de-

We operate and





**Marketing Communications.** You may [opt out](#) of receiving marketing communications from us. Additionally, you may follow the opt-out instructions in the footer of any marketing email we send or inform us of your decision to opt-out while on a call with us. Opt-out requests will only remove you from our marketing list, not from the list of any other third parties.

If you do not wish to receive text messages, you may opt out by responding **STOP** to cancel future text messages. To get help, text **HELP**. You may also request additional assistance by contacting [TextMsgSupport@phoenix.edu](mailto:TextMsgSupport@phoenix.edu) or by calling 866-766-0766.

**Social Networking Content.** You may change various user settings related to sharing your Personal Information contained in any user profile you set up as part of Social Network activities furnished by us, subject to contractual, academic, legal, or technical restrictions and reasonable notice. Note that your withdrawal from Social Network activities might prevent us from providing you with certain products or services.

**Cookies and Similar Technologies.** Using our [Preference Center](#), you can opt out of or change your preferences for most third-party cookies and tags on our Sites, except those that are “necessary” to the proper functioning of our Sites or particular features



## **16. State-Related Addenda**

### **California Addendum**

The California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 ("CCPA") requires us to make additional disclosures. If you are a California resident, please read this section for additional disclosures and information on rights you may have under California law. In the event of a conflict between this California Addendum and the remainder of this Privacy Policy, this section shall take precedence for California residents.

- Name, contact information, and other identifiers
- Customer records
- Protected classifications
- Commercial information
- Biometric information
- Internet or other electronic network activity information
- Geolocation data
- Audio, video, and other electronic data
- Employment history
- Education information
- Inferences drawn from any of above
- Sensitive Personal Information

**Categories of Third Parties to Whom Personal Information is Disclosed.** In the last 12 months, the above categories of Personal Information may have been disclosed to the

**Sensitive Personal Information.** We do not use Sensitive Personal Information for any purpose other than that reasonably anticipated to accomplish the purpose for which it is collected.

**Retention.** For each category of Personal Information collected, we only retain such Personal Information for as long as necessary to fulfill the purposes outlined in this Privacy Policy and as otherwise needed to address tax, corporate, compliance, litigation, and other legal rights and obligations.

**Opt-Out Preferences.** For information on whether and how we process opt-out signals, see the "[Do-Not-Track](#)" section above.

### **Individual Rights Under California Law**

California law grants California consumers certain rights and imposes restrictions on businesses as set forth below. **If you are a resident of California, you have the following rights:**

**Do Not Sell or Share.** The right to opt out of the "*sale*" or "*sharing*" of your Personal Information (as those terms are defined in the CCPA).

**Verifiable Requests to Delete, Requests to Know, and Requests for Correction.** Subject to certain exceptions, California residents have the right to make the following requests at no charge:

- [REDACTED] have collected and to have such Personal Information deleted, except where an exemption applies.
- **Request to Know.** The right to request and, subject to certain exemptions, receive a copy of the specific pieces of Personal Information that we have collected [REDACTED]

- Categories of third parties with whom we have disclosed or shared their Personal Information;
- Categories of Personal Information that we have disclosed or shared with a third party for a business purpose;





- **Right to Correction.**

or by submitting your appeal to [Office.ComplianceUOPX@phoenix.edu](mailto:Office.ComplianceUOPX@phoenix.edu). If you have concerns about the res594 0.133 ()1 (e (ave)-4 n)2 (s)-78137 rg0 Tcp7452 0 0 12avettt te2ave te rey-