# **Privacy Policy**

## Purpose

The purpose of this Privacy Policy is to describe how Trinity International Theological Seminary, LLC ("Trinity," "us," "we," or "our") collects, uses and shares information about you through our U.S. online interfaces (e.g., websites and mobile applications) owned and controlled by us, including www.titseminary.org (collectively referred to herein as the "Site"). Please read this notice carefully to understand what we do. If you do not understand any aspects of our Privacy Policy, please feel free to contact us at info@titseminary.org.

# What Information this Privacy Policy Covers

This Privacy Policy covers information we collect from you through our Site. Some of our Site's functionality can be used without revealing any personal information, though for features or services related to the Online Courses, personal information is required. If you do not use these specific features or services on the Site, then the only information we collect will be "Non-Personal Information" (i.e., information that cannot be used to identify you). Non-Personal Information includes information such as the web pages that you have viewed. In order to access certain features and benefits on our Site, you may need to submit "Personally Identifiable Information" (i.e., information that can be used to identify you). Personally Identifiable Information can include information such as your name and email address, among other things. You are responsible for ensuring the accuracy of the Personally Identifiable Information you submit to Trinity. Inaccurate information may affect your ability to use the Site, the information you receive when using the Site, and our ability to contact you. For example, your email address should be kept current because that is one of the primary manners in which we communicate with you.

## What You Consent to by Using Our Site

Please understand that by submitting any Personally Identifiable Information to us, you consent and agree that we may collect, use and disclose such Personally Identifiable Information in accordance with this Privacy Policy and as permitted or required by law. If you do not agree with these terms, then please do not provide any Personally Identifiable Information to us. If you refuse or withdraw your consent, or if you choose not to provide us with any required Personally Identifiable Information, we may not be able to provide you with the services that can be offered on our Site.

## What Information We Collect

We gather two types of information about users through the Site:

**Non-Personal Information.** When users come to our Site, we may track, collect and aggregate Non-Personal Information indicating, among other things, which pages of our Site were visited, the order in which they were visited, when they were visited, and which hyperlinks were "clicked." We also collect information from the URLs from which you linked to our Site. Collecting such information may involve logging the IP address, operating system and browser software used by each user of the Site. Although such information is not Personally Identifiable Information, we may be able to determine from an IP address a user's Internet Service Provider and the geographic location of his or her point of connectivity.

**Personally Identifiable Information.** We collect Personally Identifiable Information that you provide to us when you register for an account, update or change information for your account, purchase products or services, complete a survey, sign-up for email updates or Online Courses, participate in our public forums, send us email messages, and/or participate in Online Courses or other services on our Site. We may use the Personally Identifiable Information that you provide to respond to your questions, provide you the specific course and/or services you select, send you updates about Online Courses offered by Trinity or other Trinity events, and send you email messages about Site maintenance or updates.

Account Registration. If you register for an account on our Site, you may be required to provide us with Personally Identifiable Information such as your name and email address.

Updates. Trinity may offer you the ability to receive updates either via email or by posting on portions of the Site only accessible to registered users. In order to subscribe to these services, you may be required to provide us with Personally Identifiable Information such as your name and email address.

Forums. Trinity may offer public forums from time to time (the "Forums") where you can share comments and thoughts. In order to participate in the Forums, you may be required to register with us and/or provide us with Personally Identifiable Information such as your name and email address. Personally Identifiable Information shall not include any information posted or sent by or to you via any public Forum. Please keep in mind that information you post or make available in Forums will be publicly available. Accordingly, you should be careful when posting any personal or sensitive information.

Participation in Online Courses. Trinity offers users the opportunity to participate in an Online Course on or through the Site. If you desire to participate in a course, you will be asked to provide us with certain information necessary to conduct such a course. This information may include, among other things, your name and email address.

If you participate in an online course, we may collect from you certain student-generated content, such as assignments you submit to instructors, peer-graded assignments and peer grading student feedback. We also collect course data, such as student responses to standalone quizzes, exams and surveys.

Communications with Trinity. We may receive Personally Identifiable Information when you send us an email message or otherwise contact us.

Third Party Sites. We may receive Personally Identifiable Information when you access or log-in to a third party site, e.g., Facebook, from our Sites. This may include the text and/or images of your Personally Identifiable Information available from the third party site.

Surveys. We may receive Personally Identifiable Information when you provide information in response to a survey operated by us.

Partner sites providing Online Course related tools and services to Trinity users may collect nonfinancial individual level user data regarding the individual's use of that partner site while engaged with such Online Course related activities, and the partner sites may share that data with Trinity for the purpose of improving Trinity's services, the partner site's services, and the individual's education experience. This data includes information such as the amount of time spent on the partner site and pages viewed.

Third Party Credit Card Processing. Trinity provides you with the ability to pay for Online Courses and other services using a credit card through a third party payment processing service provider. Please note that our service provider – not Trinity – collects and processes your credit card information.

#### How We Use the Information

Non-Personal Information. We use Non-Personal Information to build higher quality, more useful services by performing statistical analyses of the collective characteristics and behavior of our users, and by measuring demographics and interests regarding specific areas of our Site. We may also use it for other business purposes.

Personally Identifiable Information. Except as set forth in this Privacy Policy or as specifically agreed to by you, Trinity will not disclose any Personally Identifiable Information we gather from you on the Site. In addition to the other uses set forth in this Privacy Policy, we may disclose and otherwise use Personally Identifiable Information as described below. We may also use it for research and business purposes, including improving and customizing the Site and the products and services we offer.

Updates. We use Personally Identifiable Information collected when you sign-up for our various email or update services to send you the messages in connection with the Site or an Online Course. We may also archive this information and/or use it for future communications with you.

Participation in Online Courses. We use the Personally Identifiable Information that we collect from you when you participate in an Online Course through the Site for processing purposes, including but not limited to tracking attendance, progress and completion of an Online Course. We may also share your Personally Identifiable Information and your performance in a given Online Course with the instructor or instructors who taught the course, with teaching assistants or other individuals designated by the instructor or instructors to assist with the creation, modification or operation of the course, and with the institution or institutions with which they are affiliated. Also, we may archive this information and/or use it for future communications with you.

Identity Verification. For services that require identity verification, we use the Personally Identifiable Information that we collect for verifying your identity, and for authenticating that submissions made on the Site were made by you. Your photo identification document will be deleted after successful verification of your profile information.

Communications with Trinity. When you send us an email message or otherwise contact us, we may use the information provided by you to respond to your communication and/or as described in this Privacy Policy. We may also archive this information and/or use it for future communications with you.

Communications with Trinity Business Partners. We may share your Personally Identifiable Information with Learning partners and other business partners of Trinity so that Trinity Learning partners and other business partners may share information about their products and services that may be of interest to you.

Research. We may share general course data (including quiz or assignment submissions, grades, and forum discussions), information about your activity on our Site, and demographic data from surveys operated by us with our Learning partners and other business partners so that our Learning partners and other business partners may use the data for research related to online education.

Disclosure to Trinity Operations and Maintenance Contractors. We use various service providers, vendors and contractors (collectively, "Contractors") to assist us in providing our products and services to you. Our Contractors may have limited access to your Personally Identifiable Information in the course of providing their products or services to us, so that we in turn can provide our products and services to you. These Contractors may include vendors and suppliers that provide us with technology, services, and/or content related to the operation and maintenance of the Site or the Online Course. Access to your Personally Identifiable Information by these contractors is limited to the information reasonably necessary for the contractor to perform its limited function for us.

Government Authorities, Legal Rights and Actions. Trinity may share your Personally Identifiable Information with various government authorities in response to subpoenas, court orders, or other legal process; to establish or exercise our legal rights or to protect our property; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us. We also may share your Personally Identifiable Information when we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of Trinity, the Site, our users, customers, or others.

Disclosure to Acquirers. Trinity may disclose and/or transfer your Personally Identifiable Information to an acquirer, assignee or other successor entity in connection with a sale, merger, or reorganization of all or substantially all of the equity, business or assets of Trinity to which your Personally Identifiable Information relates.

## **External Links**

For your convenience we may provide links to sites operated by organizations other than Trinity ("Third Party Sites") that we believe may be of interest to you. We do not disclose your Personally Identifiable Information to these Third Party Sites without obtaining your consent. We do not endorse and are not responsible for the privacy practices of these Third Party Sites. If you choose to click on a link to one of these Third Party Sites, you should review the privacy policy posted on the other site to understand how that Third Party Site collects and uses your Personally Identifiable Information.

## **Confidentiality & Security of Personally Identifiable Information**

We consider the confidentiality and security of your information to be of the utmost importance. We will use industry standard physical, technical and administrative security measures to keep your Personally Identifiable Information confidential and secure and will not share it with third parties, except as otherwise provided in this Privacy Policy, or unless we have good faith belief that such disclosure is necessary in special cases, such as a physical threat to you or others. Because the Internet is not a 100% secure environment we cannot guarantee the security of Personally Identifiable Information, and there is some risk that an unauthorized third party may find a way to circumvent our security systems or that transmission of your information over the Internet will be intercepted. It is your responsibility to protect the security of your login information. Please note that e-mails and other communications you send to us through our Site are not encrypted.

# Family Educational Rights and Privacy Act (FERPA)

Trinity International Theological Seminary is in compliance with the Family Educational Rights and Privacy Act (FERPA) which affords students certain rights with respect to their education records.