

## Website Privacy and Cookies Policy

This policy sets out the basis on which President & Fellows of Middlebury College which includes the Middlebury College – UK Trust Ltd. and its Middlebury College-CMRS Oxford Humanities Program (“we/our/us” or “Middlebury”) processes and shares any personal data we collect from your use of this website [www.cmrs.org.uk](http://www.cmrs.org.uk) (“Website”). By visiting our Website you are accepting and consenting to the practices described in this policy.

It may be used to keep in touch with you as a member of the Middlebury alumni community or a supporter of Middlebury in relation to the following:

- Middlebury updates and memos.
- Offers and discounts to which you may be entitled.
- Invitations to events.
- Fundraising.
- Occasional elements of direct marketing for Middlebury departments.

The data you provide will be stored securely and with integrity on a database within Middlebury networks.

Only relevant staff of Middlebury will have access to the data stored on the database.

If you are a prospective or current student, or if you were a student at Middlebury and have now left, please also read our Student Privacy Policy

[http://www.middlebury.edu/middlebury\\_google\\_custom\\_search/go/registrar](http://www.middlebury.edu/middlebury_google_custom_search/go/registrar) which explains further how we use our students’, prospective students’ and alumni’s personal data.

For the purpose of the Data protection Act (“DPA”), the data controller is ‘Middlebury College UK Trust Limited’ c/o Centre for Mediaeval and Renaissance Studies, St. Michael’s Hall, Shoe Lane, Oxford, United Kingdom, OX1 2DP. The Middlebury College UK Trust Ltd. is registered on the UK Data Protection Register with company number 04133294.

### **1. Collection of your information**

We only collect personally identifying information about you when you visit the Website and provide us with such information. Personal information we may collect from you may include, for example, your name, address, e-mail address, telephone number(s), country of residence, citizenship, the type of study programme you are most interested in and any questions or comments you may have.

If you email or call us or complete a profile form to register or update your details as an alumni or supporter, you will be sharing the personal information that you provide to us. Where you make a donation to us through the Website, this may include your bank details.

If you contact us, we may keep a record of that correspondence.

If you do nothing during your visit but browse through the Website or download information, our system will automatically gather and store certain information about your visit. This information does not identify you personally and is used in an aggregate way to help us improve our Website and tell us the number of visitors to our site each day.

## Website Privacy and Cookies Policy

Our web server may automatically collect and record the following information about your computer:

- The visitor's domain name, but not the email address.
- The visitor's IP address.
- The name and release number of web browser software used.
- The operating systems used.
- The date and time when you access our site.
- The address of the website that linked to us (referrer URL).
- Demographic information (including age, gender and an overview of traffic by age and gender).
- Overview of traffic by affinity, in-Market and other categories.
- Clickstream to, through and from our Website.
- Page response times, download errors and length of visits to certain pages, for system administrative purposes.

The above information is statistical data about our users' browsing actions and patterns, and does not identify any individual.

### **2. Our use of your information**

We may use the information we collect from you:

- To provide you with the information that you have requested from us (for example, a prospectus, information on open days, visiting the campus, scholarships, on how to make a donation to support us);
- To put you in touch with a member of our staff to discuss matters that you have asked us to contact you about (for example, our admissions procedure, fees, accommodation, scholarships or any related matter);
- To process a donation or provide an alumni or supporter service that you have requested from us;
- To send you further information about our programmes or any of our collaborating organisations which we think may be of interest to you, but we will always give you the option to opt out of receiving any future emails;
- To email your friend whose contact details including email address you have supplied to us with information about our programmes or any of our collaborating organisations which we think may be of interest to them. We will always give your friend the option to opt out of receiving any future emails or communications from us;
- To deal with any correspondence, concerns or enquiries you have raised;
- To help us improve our services, for example by acting on any information you have provided to us;
- To notify you about changes to our Website;
- To ensure that content from our Website is presented in the most effective manner for you and your computer; and,
- As part of our efforts to keep our Website safe and secure.

### **3. Our disclosure of your information to third parties**

If you contact us via our Website, your personal data will be shared with relevant members of our staff for the purposes set out in section 2 above. We may also disclose your personal data to collaborating organisations that provide teaching, assessment or student services in partnership with us for the programme you have expressed an interest in. This could include Keble College or the Bodleian Libraries.

We may from time to time appoint service providers, for example of IT services, to provide services to us. These include third parties who provide payment processing services in relation to any donations made through the Website. We may also use analytics and search engine providers to assist us in the improvement and optimization of our Website. This may include disclosing your personal data to them to enable it to be processed for a purpose which is consistent with this privacy policy.

We may disclose your information to the government or to law enforcement agencies in connection with the investigation of unlawful activities.

### **4. International data transfers**

The information that we collect from you may be transferred to, processed and stored at a destination outside the European Economic Area (“EEA”). Middlebury operates as a college in the United States of America, and your information may be sent to its offices in Middlebury, Vermont. We may also transfer your information to any of our service providers or collaborating organisations who operate outside the EEA. By submitting your information to us, you agree to this transfer, processing or storing. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy.

### **5. Access to information**

The Data Protection Act gives you the right to access information held about you. Any access request will be subject to a fee of GBP 10 to meet our costs in providing you with details of the information we hold about you.

### **6. Your consent**

By using our Website and submitting your information to us, you consent to our use of that information as set out in this policy. If you provide us with sensitive personal data (for example, if you provide comments to us that include details of your racial or ethnic origins, your state of health or learning needs) you expressly consent to us using that data for the purpose you have given in that correspondence.

### **7. Cookies**

Many websites now use cookies to provide useful features to their visitors by providing customizable and personalized services.

## Website Privacy and Cookies Policy

A cookie is a small amount of data that is sent to your browser from a web server and stored on your computer's hard drive. For example, a website may use cookies to store and sometimes track information about you, your preferences or the pages you last visited.

Your browser software can be set to reject all cookies, or to ask if you would like to accept or decline a cookie from a particular site before it is set. Most browsers offer instructions on how to reset the browser to reject cookies in the Help section of the toolbar. You should know, however, that if you reject a cookie, certain functions and conveniences of a site may not work properly.

We use cookies on our Website for the following purposes:

- Store and sometimes track visitor preferences.
- Record session information.
- Customise web page content on visitors' browser type or other information that the visitor sends.
- Analysis and evaluation of our advertising campaigns.
- We will never link the cookie to your personal information.

For certain advertising campaigns and general web traffic analysis, we will make use of 3<sup>rd</sup> party tracking solutions. Data collected by these 3<sup>rd</sup> parties on behalf of Middlebury will not be used, either by us or the 3<sup>rd</sup> party, for any use other than those stated above.

### **8. Security of information**

We recognize that many people are concerned about the privacy and protection of information as it is transmitted over the Internet. Unfortunately, we cannot guarantee that the transmission of information via the Internet is totally secure and you acknowledge that any transmission is at your own risk. You should keep in mind that the possibility exists for unauthorized individuals to intercept any email message you send over the Internet. In some cases, information can be encrypted (scrambled or encoded) to make it very difficult to read if it is intercepted during communication. Certain technology and practices allow websites to provide an increased level of security for your information when appropriate.

We use the following practices on our Website(s) to enhance the level of security for communication and the transmission of personal information:

- We have taken reasonable steps to ensure the integrity and confidentiality of personally identifiable information that you may provide.
- We use email forms to allow our customers to ask questions about our services and programmes. These are not hosted on a secure server. The possibility exists that unauthorized individuals may intercept email messages.
- We are not responsible for the privacy of email messages except those stored in our system.
- We have appropriate security measures in place in our physical facilities to protect against the loss, misuse or alteration of information that we have collected for you at our site.

**9. External websites**

Our Website may, from time to time, contain links to external websites (for example, links to our Facebook or Linked-In page). If you follow a link to any external websites, please note that these websites have their own privacy policies and website terms and we do not accept any responsibility or liability for these policies. Please check any such policies before you submit any information to any external website.

**10. Changes to this privacy policy**

Any changes we may make to our privacy policy will be posted on this page. Continued use of our Website will signify that you agree to any such changes.

**11. “Opting-out”, changing your contact information or contacting us**

If you have any questions, concerns, comments or requests regarding this privacy policy, would like to opt-out from receiving marketing communications from us, update any details or information we hold about you, or access to the information we hold about you, please contact us using the details at [www.cmrs.org.uk/contact-us](http://www.cmrs.org.uk/contact-us).