

## ACADEMIC ANALYTICS PRIVACY POLICY

**Last Updated:** June 30, 2017

Academic Analytics, LLC (“**Academic Analytics**”, “**we**”, “**us**” or “**our**”) is a provider of high-quality, custom business intelligence data and solutions for research universities in the United States and Europe. As part of our work for our clients, we may obtain information that is personal and identifiable to individuals.

We understand that privacy is valued by both the universities with whom we work with and the persons to whom any personal identifiable data relates. We will do our best to maintain the privacy and confidentiality of Personal Information (as defined below) that we collect in accordance with this privacy policy (this “**Policy**”).

### **A. GENERAL POLICY**

#### **Personal Information We Collect**

The information we collect as part of our work may include personally identifiable information, such as (among other things) names, positions or job titles, levels of education and professional affiliations – including the schools and departments where individuals work or received degrees, papers published by individuals and the academic groups or professional bodies to which an individual belongs (collectively, “**Personal Information**”). Generally, we collect information in the following ways:

- Personal Information is usually provided to us directly by our clients (and rarely from the individuals to whom the Personal Information relates).
- We obtain publicly available information as part of our work – such as information posted on publicly available web sites or in academic journals.
- Licensed third-parties with whom Academic Analytics has a contractual arrangement may provide us with information (including Personal Information).
- We may collect information regarding a person’s visit to our websites such as the visitor’s IP address, type of browser and the date/time of visit – this information would generally not be directly identifiable to an individual.
- In some instances, individuals (who are representatives of our clients) may access non-publicly available parts of our website and input personally identifiable information about themselves, but such information is solely provided to us in their capacity as representatives of our clients. We do not collect such information for the purposes of selling goods or services to individual consumers.

## **Purposes for Which We Use Your Personal Information**

Academic Analytics uses the Personal Information we collect for a number of purposes. Personal Information collected may be used to determine scholarly research accomplishments in areas such as publications, funding and honorific awards. This allows us to provide universities and university systems with objective data that administrators can use in a number of ways, including to support their strategic decision-making processes, benchmarking in comparison to other institutions, etc.

We also use information we collect as part of visits to our websites (such as IP addresses) to detect fraud or abuses of our website.

In cases where we receive Personal Information directly from our clients (and not from the individuals to whom the Personal Information relates), we will cooperate with our clients' reasonable requests to assist them in providing notice to the impacted individuals regarding how we use Personal Information.

## **Third Parties with Whom We May Share Your Personal Information**

Academic Analytics may, in accordance with this Policy, share your Personal Information with the following types of third parties:

- Service providers
- Contractors
- Subscribers to our services and web portal

We may share your Personal Information with such third parties for the following purposes:

- in order for such third parties to provide products or services to Academic Analytics; and
- to provide our services to our customers and subscribers.

In the event we are acquired by, or merge or consolidate into, another entity, or if there is a sale of our assets, Personal Information may be transferred to the entity acquiring Academic Analytics or our assets or that survives the merger or consolidation.

Academic Analytics shall take reasonable steps to ensure that any third party receiving Personal Information from Academic Analytics is subject to contractual obligations to comply with the requirements of this Policy (and, with respect to Personal Information provided to us directly by our clients, any reasonable instructions of our clients).

## **B. ADDITIONAL PROVISIONS APPLICABLE TO CALIFORNIA RESIDENTS**

In addition to any other provisions of this Policy applicable to Personal Information, the following provisions apply to California residents and Academic Analytics' collection and use of their Personal Information.

## Access to Your Personal Information

Except as otherwise set forth below, upon written request, Academic Analytics shall allow individuals to review and request changes to Personal Information collected by Academic Analytics. The individual will need to provide sufficient identifying information to Academic Analytics at the address provided below in the section entitled "[CONTACT US](#)". In some circumstances, we may charge a reasonable fee, where warranted, for access to such Personal Information.

## California Do Not Track Disclosures

At this time, Academic Analytics does not respond to browser 'Do Not Track' signals, as we await the work of interested stakeholders and others to develop standards for how such signals should be interpreted.

## Cookies

Academic Analytics uses cookies to collect information, such as IP addresses, related to visits to our websites. A cookie is a small amount of data, which often includes an anonymous unique identifier, which is sent to a browser from a web site's servers and stored on a computer's hard drive. Academic Analytics uses cookies to detect fraud and other abuses of our websites.

## C. ADDITIONAL PROVISIONS APPLICABLE TO PERSONAL INFORMATION RECEIVED FROM THE EUROPEAN UNION AND SWITZERLAND

### EU-U.S. and Swiss-U.S. Privacy Shields

Academic Analytics complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework (collectively the "**Frameworks**") as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information transferred from the European Union and Switzerland to the United States, respectively. Academic Analytics has certified that it adheres to the Privacy Shield Principles (as defined below). If there is any conflict between the policies in this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov>.

The U.S. Federal Trade Commission has investigative authority and enforcement jurisdiction over Academic Analytics' compliance with the Frameworks.

In compliance with the EU-U.S. and Swiss-U.S. Privacy Shield Principles (collectively, the "**Privacy Shield Principles**"), Academic Analytics commits to resolve complaints about your privacy and our collection or use of your Personal Information. European Union and Swiss individuals with inquiries or complaints regarding this privacy policy should first contact Academic Analytics at the address provided below under the section of this Policy entitled "[CONTACT US](#)".

Academic Analytics has further committed to refer unresolved privacy complaints under the EU-U.S. and Swiss-U.S. Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU

PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgement of your complaint, or if your complaint is not satisfactorily addressed, please visit <http://www.bbb.org/EU-privacy-shield/for-eu-consumers> for more information and to file a complaint.

Finally, as a last resort and, under certain limited conditions, EU and Swiss individuals with unresolved complaints may invoke binding arbitration before a Privacy Shield Panel.

### **Onward Transfer**

Academic Analytics does not disclose Personal Information to any third parties except to fulfill the purposes for which the information was disclosed or for the purposes described in this Policy – for further information, see the section of this Policy entitled [“Third Parties With Whom We May Share Your Personal Information”](#).

With respect to any Personal Information related to EU or Swiss individuals, Academic Analytics will only provide such Personal Information to third parties as permitted by the Privacy Shield Principles and our relevant contracts with our clients providing us such Personal Information. We will ensure that any third party receiving such Personal Information from us has entered into a written agreement with Academic Analytics requiring that such third party provide at least the same level of privacy protection as the Privacy Shield Principles.

Academic Analytics has responsibility for the processing of Personal Information pertaining to EU and Swiss individuals that it receives and subsequently transfers to a third party acting on its behalf. Academic Analytics remains liable under the Privacy Shield Principles if any such third party processes such Personal Information in a manner inconsistent with the Privacy Shield Principles, unless Academic Analytics can prove that it is not responsible for the event giving rise to the damage.

### **Data Security**

Academic Analytics takes reasonable and appropriate steps to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Academic Analytics cannot guarantee the security of Personal Information on or transmitted via the Internet.

### **Access**

EU and Swiss individuals have the right to access their Personal Information. Except as otherwise set forth below, upon written request (at the address provided below under the section of this Policy entitled [“CONTACT US”](#)), Academic Analytics shall allow such individuals to amend, correct or delete any of their Personal Information possessed by Academic Analytics that is inaccurate or that is being processed in violation of this Policy. The individual will need to provide sufficient identifying information. In some circumstances, we may charge a reasonable fee, where warranted, for access to such Personal Information.

## **Data Integrity & Limitations on Data Use**

Academic Analytics shall only process and use Personal Information in a way that is compatible with and relevant for the purpose for which it was provided to Academic Analytics. To the extent necessary for those purposes, Academic Analytics shall take reasonable steps to ensure that Personal Information in our possession is accurate, complete, current and reliable for its intended use.

## **Choice**

In accordance with this Policy and the Privacy Shield Principles, and except in connection with transfers to third parties performing tasks directly on our behalf and pursuant to our instructions, where we receive Personal Information directly from an EU or Swiss individual to which such Personal Information pertains, we will offer the individual the opportunity to choose (opt out) whether his/her Personal Information is (1) disclosed to a third party; or (2) used for a purpose other than the purpose for which he/she provided consent. Anyone wishing to opt out can do so by contacting Academic Analytics at the address provided below under the section of this Policy entitled "[CONTACT US](#)"

Where we receive Personal Information pertaining to EU and Swiss individuals directly from our clients (and not the individual to whom the Personal Information relates), we will cooperate with our clients' reasonable requests to:

- assist them in informing the impacted individuals about (a) the possibility that we may disclose such individuals' information to third parties and (b) the individual's ability to opt out of such disclosures (except for disclosures to third parties performing tasks directly on our behalf and pursuant to our instructions); and
- reasonably ensure that we process the information for purposes compatible with those for which it was originally collected or subsequently authorized by the impacted individuals.

Our clients will then inform us if any such individuals have opted out of such disclosures.

We do not intend to receive any "**Sensitive Personal Information**" (which may include Personal Information relating to medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, the sex life of the individual, ideological views or activities, social security measures pertaining to an individual, or administrative or criminal proceedings and sanctions). We also do not intend to share any such Sensitive Personal Information with third parties. Neither our clients nor any individuals should provide any Sensitive Personal Information to us.

## **Verification of Privacy Shields**

Academic Analytics has undertaken a self-assessment verifying that this Policy conforms to the Privacy Shield Principles. We will continue to undertake annual self-assessments to verify that this Policy remains compliant with the Privacy Shield Principles and the Frameworks.

## **Exceptions to the Privacy Shield Principles**

As it relates to Personal Information pertaining to EU and Swiss individuals, please be aware that there are certain exceptions to the Privacy Shield Principles. For instance our adherence to the Principles may be limited to the extent necessary to meet national security, public interest or law enforcement requirements. Please note that where an exception applies to the Privacy Shield Principles, we may make use of such exception.

## **C. LEGALLY REQUIRED DISCLOSURES**

Be aware that we may be required to disclose Personal Information pursuant to subpoenas, warrants, court or government agency orders, legal process, lawful requests by public authorities (including to meet national security or law enforcement requirements) or otherwise as required by law.

## **D. CONTACT US**

Questions, comments or complaints regarding this Policy or our data collection and processing practices can be emailed to [privacy@academicanalytics.com](mailto:privacy@academicanalytics.com) or mailed to the following address:

Academic Analytics, LLC  
Data Privacy Matters  
8008 Corporate Center Drive, Suite 201  
Charlotte, NC 28226

Academic Analytics encourages interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information.

## **E. EFFECTIVE DATE OF POLICY AND UPDATING THIS POLICY**

This Policy is effective as of June 30, 2017. Academic Analytics reviews this Policy from time to time and may make changes this Policy in connection with such review. We will post any changes to this Policy on these web pages following such change. You should check this page regularly to ensure you are familiar with any changes. You agree that any posted changes to this Policy will be binding on you.