
Subject: Policy on Privacy Statements on Virginia Tech Web Sites

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1. Purpose

This policy sets forth the required communications to developers and consumers of Virginia Tech web sites regarding the privacy of any information collected by the web site.

2. Policy

This policy applies to Virginia Tech web sites, as defined in section 4 below. Related university policies and guidelines that must be respected by such individuals include the [Acceptable Use of Information Systems at Virginia Tech](#).

2.1 General Statement

The general privacy stance on web site privacy of Virginia Tech is that the institution collects no information unless it fulfills a specific purpose that:

1. is required for the business operations of the university, including research, teaching, outreach, administration and management;
2. provides or improves desired service to the user;
3. protects the security and integrity of the information; or,
4. protects the security and integrity of the web site itself and related computer resources.

2.2 Privacy statements

Virginia Tech web sites shall post a link to the privacy statement on each site. At a minimum, a link to the privacy statement will be posted on (1) the main page for each distinct server domain name; (2) pages likely to be browsed directly; and, (3) any page that collects personal information. The privacy statement will address the following issues.

2.2.1 Notice

The statement should note what information is collected, what the primary purpose of the information is, if there are any subsidiary purposes of the information, and how the information will be stored.

Notice of information collected should comment on the voluntary information collected by the web site, if any. In most cases, the web form is self-documenting with regard to collecting information voluntarily provided by the site. Notice of information collected should also comment as to whether cookies, modified URLs, embedded or hidden text, or other data collection mechanisms used to assist in maintaining state (i.e., persistence of information between pages or transactions) are being used.

2.2.2 Access

The statement should note who will have access to the information.

2.2.3 Security

The statement should note how the information will be kept secure.

2.2.4 Individual access and control

If appropriate, the statement should include information on how the user may review and/or request corrections to his or her own information, and how the user may give consent to uses of the information.

2.2.5 Children's Online Privacy Protection Act information (COPPA)

If the site is directed toward children under 13 years of age (12 years old and younger), the statement should include information on how protections guaranteed under COPPA are being provided.

2.2.6 Research on Human Subjects

When research involves humans as research subjects, approval from the Institutional Review Board for Research Involving Human Subjects (IRB) must be in place. Examples are surveys, interviews, observations of activities or behaviors, exercise tests, blood collections, psychological or medical measurements or intervention, and sensory responses to taste, smell, etc. Any research involving responses from people or access to records about people must have a review. When web sites are used to recruit research subjects or to collect information, a description of the privacy statements should be a part of the protocol review by the IRB.

2.2.7 Additional required notices

Each university web site will carry the statement "Virginia Tech complies with all statutory and legal requirements with respect to access to information." In addition, each privacy statement will remind users that privacy concerns vary with web site purposes, and that Virginia Tech does not control the privacy of pages outside of Virginia Tech that may be linked to university pages. Each web site should also post a contact email address so that site visitors may relay any privacy concerns.

3. Procedures

Virginia Tech owners of web sites are responsible for posting the privacy information.

4. Definitions

Virginia Tech web sites refers to pages maintained by or under the direction of the university or its departments and other organizational units.

5. References

[Privacy Statement Generator Tool](#)

[Acceptable Use of Information Systems at Virginia Tech](#)

6. Approval and Revisions

Approved December 1, 2000 by the Vice President for Information Systems, Earving Blythe.

- Revision 1

Added reference to online tool for generating privacy statements.

Approved April 15, 2002 by Vice President for Information Technology, Earving L. Blythe.

September 7, 2006: Technical revisions – (1) policy renumbered to Information Technology Policy 7030 from former General University Policy 2030; (2) reference removed to obsolete Policy 2020: Policy on Protecting Electronic Access Privilege.