

Online Privacy Policy

****This Policy Has Been Modified****

Effective Date of This Online Privacy Policy

This Online Privacy Policy is effective as of November 16, 2010.

Scope of This Policy

This Policy describes how Capella Education Company protects your privacy when you use any Web site that we own and that displays a link to our [Privacy Center](#). This Policy applies only to Web sites that display a link to our [Privacy Center](#), including but not limited to the following Sites, which we own:

- Capella's primary public site (<http://www.capella.edu>)
- iGuide/Campus (<http://campus.capella.edu>)
- Courseroom (<http://courseroom2.capella.edu>)
- Capella Commons (<http://capellacommons.com>)
- Any site with a Blogs.Capella.edu hostname

If you are a learner (or are applying to become a learner) at Capella, your Personal Information may also be protected under the Family Educational Rights and Privacy Act ("FERPA"). The provisions of FERPA supersede and govern over any contrary provisions in this Policy. To learn more about FERPA and Capella's FERPA Compliance Program, click here:

http://www.capella.edu/inc/pdf/pol_FERPA.pdf

Privacy Notices

Where additional information is needed to explain our privacy practices on a certain Site, we will post a supplementary privacy notice at our [Privacy Center](#). Particular pages of a Site may also contain supplementary privacy notices providing more details about the information we collect on those pages. These additional notices are collectively referred to as "Privacy Notices" and are part of this Policy. Privacy Notices may advise you that different policies and practices apply to the information collected through those pages, in which case those different policies and practices will supersede this Policy.

Country-Specific Notices

Privacy requirements vary from country to country. To meet these requirements we may include certain "country-specific notices" as part of this Policy. If any of the terms of a country-specific notice are different than the general terms of this Policy, the terms of the country-specific notice will supplement or amend this Policy, but only to the extent that the laws of that country apply to the collection of Personal Information through our Sites.

This Policy is Part of Our Terms of Use

This Policy is referenced in and is an integral part of the [Terms of Use](#) governing your use of our Sites. Please take a few minutes to review our [Terms of Use](#), if you have not already done so.

Your Consent to This Online Privacy Policy

By using any Site that displays a link to our [Privacy Center](#), you are consenting to the collection, use, and transfer of your Personal Information as described in this Policy (and any relevant Privacy Notice). If you do not consent to the collection, use and transfer of your Personal Information as described in this Policy (and any relevant Privacy Notice), you may not use our Sites.

This Privacy Policy May Change

We reserve the right to update or modify this Policy and any Privacy Notice, at any time and without prior notice, by posting the revised version of the Policy or Privacy Notice at our [Privacy Center](#). If we modify this Policy or any Privacy Notice, the modifications will only apply to the Personal Information we collect after we have posted the revised Policy or Privacy Notice at our [Privacy Center](#).

Your use of our Sites following any such change constitutes your agreement that all information collected from or about you after the revised Policy or Privacy Notice is posted will be subject to the terms of the revised Policy or Privacy Notice. You may access the current version of this Policy at any time by clicking on the “Privacy Center” link at the bottom of each page of the Sites governed by this Policy. To alert you when we modify this Policy or any Privacy Notice, we will provide a notice at the top of this Policy or the relevant Privacy Notice for at least thirty days after the new effective date.

From time to time, for example, because of changes in the law or technology or the way we operate our business, we may ask your permission to use the Personal Information we have collected from you in the past in new or different ways. We will do this by sending you a notice by e-mail or postal mail at the last e-mail or postal address you provided to us, asking you to agree to the change. If you do not expressly agree to the change, we may, at our discretion, delete all or some of your Personal Information from our databases to avoid using your information in ways to which you have not consented.

Your Choices

We respect your right to make choices about the ways we collect, use, and share your Personal Information. We generally ask you to indicate your choices at the time and on the page where you provide your Personal Information. Depending on the nature of your choices and applicable law, we may also give you ways to change your privacy preferences.

If we provide a means for you to change your privacy preferences, you must give us enough information and a reasonable amount of time to process your request. Your new preferences will

only apply prospectively. For example, if you give us permission to share your Personal Information with our affiliates and later withdraw your permission, you may still receive e-mail from one of our affiliates, if we shared your Personal Information before you withdrew your permission.

Definitions

The term “Policy” refers to this Online Privacy Policy.

Personal Information is information that identifies you personally, alone or in combination with other information available to us.

The terms “Capella,” “we,” “us,” and “our” refer to Capella Education Company

References to “our Sites” refer to Web sites owned by Capella Education Company that display a link to our [Privacy Center](#).

User Generated Content means all of the text, photographs, images, illustrations, graphics, sounds, video and audio-video clips, and other content you post on or through our Sites.

What Information Is Collected on Our Sites and How is it Used?

Information you knowingly and voluntarily provide. Capella collects the information you knowingly and voluntarily provide (using your mouse and keyboard) when you use one of our Sites. The information we collect depends on how you use our Sites, but, in many cases, it will identify you personally. For example, if you submit an application, we collect the information you provide as part of the online application process. Likewise, we collect the information you provide when you request information, create an account, or contact us with questions or comments. If you post photographs or comments on one of our Sites—for example, to your public profile or on one of our blogs—we collect that information also. All postings must comply with the requirements for User Generated Content as set forth in our [Terms of Use](#).

Our various Sites serve different purposes. To fully understand the types of information you may provide to Capella through a particular Site and the manner in which Capella uses that information, visit our [Privacy Center](#) and read the relevant Privacy Notice.

In general, however, Capella uses the Personal Information you volunteer to provide the information, services and products you request. We may also use your contact information to follow up with you after you have expressed an interest in our programs. Finally, we may use the Personal Information collected through our Sites to improve our programs and services, to improve the content, functionality, navigation, and usability of our Sites; to better understand the needs and interests of learners, alumni, and the other constituencies we serve; and to better market our programs, services, and products. We may also remove all the personally identifiable information and use the rest for historical, statistical, or scientific purposes.

Information Others Provide. The User Generated Content others post on our Sites may contain your Personal Information. For example, if you attend a graduation ceremony, someone may post photographs of you and others that he/she took at the ceremony. All postings must comply with the requirements for User Generated Content as set forth in our [Terms of Use](#).

Information Sent to Us by Your Web Browser. We collect information that is sent to us automatically by your Web browser. This information typically includes your IP address, the name and version of your operating system, the name and version of your browser, the date and time of your visit, the Web site you were visiting before you visited one of our Sites, and the pages on our Sites you visit. Please check your browser if you want to learn what information your browser sends or how to change your settings.

This information does not identify you personally. Generally, we use this information to improve our Site and make it more compatible with the technology used by our visitors. On some Sites, however, we may link information sent by your browser to information that identifies you personally. For example, if you have created a user identity by signing up to use a password-protected area of our Sites, we may link your IP address to information that identifies you personally. In addition, if we suspect criminal activity, we may share our server logs with the appropriate investigative authorities who could use that information to trace and identify individuals.

Cookies and Similar Technologies. We use “cookies” and similar Web technologies to collect information and support certain features of our Sites. For example, if you visit some of our Sites, including Capella.edu or iGuide (<http://campus.capella.edu>), a cookie may be placed on your browser so that we can recognize you in the future as someone who has expressed interest in Capella or who is a Capella learner. A cookie is a piece of Web code that is used primarily for one or more of the following: analysis of Web site traffic and user behavior, application functionality, and data storage. We use two types of cookies: “session cookies” and “persistent cookies.”

We use session cookies to assign a randomly generated unique identification number to your computer. Assigning your computer a number permits us to follow you as you move from page to page. A session cookies expires after you close your browser.

We use session cookies to collect statistical information about the ways visitors use our Sites—which pages they visit, which links they use, and how long they stay on each page. We analyze this information (known as “clickstream data”) to better understand our visitors’ interests and needs and to improve the content and functionality of our Sites. Session cookies do not identify you personally. If, however, you have created a user identity on a visit to one of our Sites, we may link the information collected by our session cookies to information that identifies you personally.

We use persistent cookies (cookies that do not expire when you close your browser) for several purposes. Like session cookies, they are used to assign a unique identifier to your computer, but because they are persistent, they permit us to recognize your computer each time you use it to access the Site. By using persistent cookies, we can collect and analyze clickstream data from

more than one visit to the Site. Cookies are also used to store information you have previously provided such as your user identity or shipping address that can be displayed back to you automatically each time you visit the Site. Persistent cookies remain on your computer until you delete them or until they expire. Expiration durations vary and are set by Capella and/or our third-party service providers.

Finally, both types of cookies (persistent and session) are occasionally used to facilitate the proper functioning of our applications and features of the Site.

If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. Although you are not required to accept cookies when you visit our Sites, you may be unable to use all of the functionality of our Sites if your browser rejects our cookies. In fact, if you are a Capella learner, you may not be able to fulfill course requirements if you set your browser to reject cookies.

How Does Capella Share Your Personal Data?

We may share Personal Information collected through our Sites with companies and organizations that perform certain functions on our behalf. For example, we may share such information with companies that provide support services to us or that help us improve and/or market our products and services (such as third-party advertising companies and colleges with whom we have referral relationships). These third parties are required by contract to use the Personal Information we share with them only to perform services on our behalf and to treat your Personal Information as strictly confidential. Among the third-party service providers we use are Omniture, which helps us track use of our Sites, and Doubleclick, which helps us serve advertisements to individuals we believe may be interested in our products and services. To learn how Omniture use cookies and other technologies, go here:

<http://www.omniture.com/en/privacy/product>. For similar information about Doubleclick, click here: <http://www.google.com/doubleclick/privacy/>. You may also inquire about these and other third-party service providers that we use by e-mailing us at privacy@capella.edu or by calling us at 888-227-2736.

We may also share statistical information with our third-party service providers. This statistical information is aggregated and anonymized and does not identify you personally. The information helps us understand the needs and preferences of the groups we serve and improve the content and functionality of our Sites, services, and products.

There are other limited circumstances in which we may share or transfer the Personal Information in our databases to unrelated third parties. For example, we may provide Personal Information to a third party when we believe it is necessary to comply with U.S. Department of Education reporting requirements or the reporting requirements of accrediting bodies; to prevent or investigate a possible crime, such as fraud or identity theft; to comply with a court order or subpoena; to comply with a legal requirement; to enforce a contract; to protect the rights, property, or safety of Capella, our users or others; to protect your vital interests; or in connection with a corporate sale, purchase, merger, reorganization, liquidation, dissolution, or similar event. In particular, we exchange Personal Information in our databases with other companies and

organizations for fraud protection and credit risk reduction purposes. When we disclose information under these or similar circumstances, we will take appropriate steps to protect the confidentiality of your Personal Information.

Finally, User Generated Content uploaded to one of our Sites may be shared with anyone who has access to the portion of that Site, on which the User Generated Content appears, including, in some cases, the general public. For example, the general public has access to User Generated Content you post to most blogs with the blogs.capella.edu hostname. Likewise, certain members of the Capella community may have access to any User Generated Content that comprises your public profile on iGuide (<http://campus.capella.edu>). Your classmates and instructors also have access to certain User Generated Content you post to Courseroom (<http://courseroom.capella.edu>) as part of a class assignment.

In addition, we may repurpose User Generated Content you or others submit for use in advertising campaigns and other promotions, and we may or may not use your name in connection with that use. However, we will not publicly disclose in any advertising campaign or other promotion User Generated Content you post on or through our Sites solely for purposes of fulfilling a course requirement. Nor will we publicly disclose in any advertising campaign or other promotion User Generated Content you submit solely for purposes of requesting a Capella product or service or for purposes of fulfilling an obligation you have to Capella.

You should have no expectation of privacy with respect to the User Generated Content you or others submit to portions of our Sites that are accessible to individuals other than our employees or our service providers who are contractually bound to protect the confidentiality of your information. For example, you should have no expectation of privacy with respect to the User Generated Content you or others submit to portions of our Sites that are accessible to other Capella learners or the public at large. Even if you post User Generated Content to a Site accessible only to members of the Capella community or to a page accessible only to individuals you have “friended,” it is possible that those individuals will distribute that content to the general public, for example, by posting it on another Web site. Therefore, you should not submit any User Generated Content to portions of our Sites accessible to third parties unless you wish to make that information available to the general public, and you must take special care to make sure your posts comply with our [Terms of Use](#). In particular, your posts must not violate the privacy or other rights of others.

If, at any time, you wish us to take down User Generated Content that contains your Personal Information, please e-mail us at privacy@capella.edu or call us at 888-227-2736 and we will work with you to remove the User Generated Content from our Sites. Please be aware, however, that if the User Generated Content has already been distributed to other Web sites or published in other media, we will not be able to recapture and delete it.

How our Third-Party Ad Servers Use Cookies, Web Beacons, and Similar Technologies

Capella uses reputable third-party advertising companies to present (“serve”) advertisements on our behalf. These third-party ad servers may use cookies, Web beacons, or similar technologies to help present and better target our advertisements, to measure the effectiveness of our

advertisements, or to customize the content of the advertisements presented to you. For more information about our third-party ad servers, the technologies they use, and how you can disable or “opt-out” from receiving their cookies, click here:

<http://www.google.com/doubleclick/privacy/>

Sometimes Capella uses third-party advertising companies to help us with our e-mail marketing campaigns. The e-mails these third-party advertising companies send on our behalf may contain links to our Sites. These links may be designed so that we can identify e-mail recipients who click on them and/or measure the effectiveness of the e-mail campaign. The e-mails may also include cookies. These cookies do not identify you personally. They are used to help the Web sites you visit recognize you as someone with an interest in online education and to customize the content of the advertisements presented to you. Your browser cannot screen out cookies that are sent by e-mail, but you can easily disable these cookies by visiting the ad server’s Web site and following the instructions posted there. To view links to our ad server’s Web site, click here: http://www.google.com/privacy_ads.html.

The use of cookies, web beacons and similar technologies by these third-party advertising companies is subject to their own privacy policies and is not covered by this Privacy Policy.

How Does Capella Protect Personal Information?

Although Capella cannot guarantee against any loss, misuse, unauthorized disclosure, alteration or destruction of Personal Information, we take measures to prevent such occurrences. Our servers and databases are protected by firewalls and passwords. In addition, we use Secure Sockets Layer (SSL) software to encrypt data as it travels between your computer and our servers. When you see a solid key or a locked padlock icon at the lower portion of your browser window, this indicates that your transmission will be protected by SSL technology.

Does Capella Collect Personal Information From Children Through Its Sites?

Capella does not knowingly collect Personal Information from children under the age of thirteen through our Sites. If you are under thirteen, please do not give us any information that identifies you personally. If you have reason to believe that your child has provided Personal Information to Capella through its Sites, please e-mail us at privacy@capella.edu or call us at 888-227-2736, and we will use reasonable efforts to delete that information from our databases.

What About Other Sites That May Be Linked To Our Sites?

Some of our Sites link to each other. Our Sites also contain links to Web sites that are owned and operated by unrelated third parties. For example, Capella.edu links to a government Web site where you can apply for financial aid, as well as several third-party social networking sites such as Facebook, Twitter, and YouTube. In addition, our Sites contain links to Web sites operated by third parties who provide services to Capella. For example, Capella uses a third-party service provider to process credit card transactions.

This Policy applies only to Personal Information that we collect through Capella-owned Sites that display a link to our [Privacy Center](#). It does not apply to Personal Information collected on any Capella-owned site that does not display a link to our [Privacy Center](#). It does not apply to Personal Information collected on the Web sites of our service providers or other third parties. When you access a Web site to which this Policy does not apply, please take a few minutes to review the terms of use and privacy statement posted on that site.

How Can You Access and Correct Your Personal Information?

We strive to maintain the accuracy and integrity of the Personal Information in our databases. We provide ways for you to access your Personal Information as required by applicable law, so that you can correct inaccuracies or update your Personal Information. For example, if you create an account through one of our Sites, you may log on at any time and update your profile.

If you cannot access or correct your Personal Information online, please e-mail us at privacy@capella.edu, call us at 888-227-2736, or send a letter to:

Capella University
ATTN: Online Policy Manager
Capella Tower
225 South Sixth Street
Minneapolis, MN 55402

We will respond to reasonable requests within the time limits established by applicable law or within a reasonable time if no time limit is established by applicable law. For your protection, we may ask you for additional information to verify your identity. In most cases, we will provide the access you request and correct or delete any inaccurate Personal Information you discover. In some cases, however, we may limit or deny your request if applicable law permits or requires us to do so. We generally do not charge for this service, however, we reserve the right to charge a fee as permitted by applicable law.

Retention of Personal Information

Capella retains the Personal Information collected on our Sites as long as necessary to provide the services, products, and information you request or as permitted by applicable law. Our servers are located in the United States. While it is in our possession, your Personal Information will generally be stored in Capella databases or databases maintained by our service providers. Most, if not all, of these databases are stored on servers and storage devices located in the United States.

Information for Visitors Accessing Our Sites from Outside the United States

Capella is a U.S. corporation headquartered in the United States. Our Sites are currently hosted on servers located in the United States, although we reserve the right to relocate our Sites to other servers elsewhere in the world. Your Personal Information may be stored on servers located within the United States or in another country. In addition, we may transfer your

Personal Information to our service providers and others located in the United States or another country for the purposes described in this Policy. Different countries have different privacy laws and requirements, and some provide less legal protection for your Personal Information than others. Please know, however, that no matter where your Personal Information is collected, used, transferred or stored, if it was collected through this Policy, it will be protected by the terms of this Policy and any Privacy Notices or other agreements that apply to you.

BY USING OUR SITES, YOU ARE CONSENTING TO THE COLLECTION, USE, AND TRANSFER OF YOUR PERSONAL INFORMATION IN OR TO THE UNITED STATES OR TO ANY OTHER COUNTRY IN THE WORLD SUBJECT TO THE TERMS OF THIS POLICY.

Governing Law

Capella University is a U.S. corporation. The servers that support our Sites are located in the United States of America. This Policy shall be governed under the laws of the State of Minnesota, United States of America, without regard to its conflicts of law provisions.

Questions about this Policy or our Data Practices

If you have questions or concerns about this Policy or any Privacy Notice, please e-mail us at privacy@capella.edu, call us at 888-227-2736, or send a letter to:

Capella University
ATTN: Online Policy Manager
Capella Tower
225 South Sixth Street
Minneapolis, MN 55402

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