

Online Privacy Policy

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

This Online Privacy Policy is effective as of June 30, 2015

Scope of This Policy

Capella Education Company or one of its wholly owned subsidiaries (collectively, “Capella”) owns and operates this website. This Policy governs how we process information—including Personal Information—collected through any Capella-owned website that displays a link to our Privacy Center (collectively, “our Sites”). This Policy does not apply to information collected offline, such as in person, on paper, or by phone. It also does not apply to any website that does not contain a link to our Privacy Center, even if Capella owns that site.

If you are a learner (or are applying to become a learner) at Capella, your 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.

Your Consent to This Policy

By using our Sites, you are consenting to the collection, use, and transfer of your information, including Personal Information, as described in this Policy (and any relevant Privacy Notice or Country-Specific Notice). If you do not consent to the collection, use and transfer of your information as described in this Policy (and any relevant Privacy Notice or Country-Specific Notice), you may not use our Sites.

Privacy Notices

Where additional information is needed to explain our privacy practices on a certain Site, we will post a supplemental privacy notice at our Privacy Center. Particular pages of a Site may also contain supplemental 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 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 (<http://www.capella.edu/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.

This Policy May Change

We reserve the right to update or modify this Policy and any Privacy Notice or Country-Specific Notice, at any time and without prior notice, by posting the revised version at our Privacy Center. If we modify this Policy or any Privacy Notice or Country-Specific Notice, the modifications will only apply to the information we collect after we have posted the revised version.

Your use of our Sites following any such change constitutes your agreement that all information collected from or about you after the revised version is posted will be subject to the terms of the revised version. 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.

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 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 agree to the change in the manner prescribed by applicable law, we may, at our discretion, delete all or some of your information from our databases to avoid using it 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 information. We generally ask you to indicate your choices at the time and on the page where you provide your 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 information with our affiliates and later withdraw your permission, you may still receive e-mail from one of our affiliates, if we shared your information before you withdrew your permission.

In addition, you have choices about the types of email communications you receive and the manner in which your online activities are tracked:

Email preferences: You cannot opt out of transactional emails related, for example, to your enrollment or tuition. However, you can opt out of promotional emails we send to you. If you

wish to stop receiving promotional emails, simply select “unsubscribe” located at the bottom of each communication.

Online tracking and third-party cookies: California law requires this Policy to address how we respond to any “Do-Not-Track signal” delivered by your browser. Because of the changing state of technology and indecision within the industry regarding the meaning of Do-Not-Track signals, we currently do not make any guarantee that we will honor them. However, you can opt out of cookies delivered to your computer by Capella or third parties. To learn how, click [here](#).

Information We Collect and How We Use It

The categories of information we collect through our Sites are listed below. We generally use the information we collect for the following purposes:

- to provide the information, products and services you request;
- to provide you with effective customer service;
- to provide you with a personalized experience when you use our Sites;
- to contact you with information and notices related to your use of our Sites;
- to contact you with special offers and other information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us);
- to invite you to participate in surveys and provide Feedback to us (in accordance with any privacy preferences you have expressed to us);
- to improve the content, functionality and usability of our Sites;
- to better understand your needs and interests;
- to improve our products and services;
- to improve our marketing and promotional efforts;
- for security, credit or fraud prevention purposes; and
- for any other purpose identified in an applicable Privacy Notice, click-through agreement or other agreement between you and us.

Information You Manually Provide. Capella collects the information you manually provide (using your mouse, keyboard, or touchscreen) when you use one of our Sites. The information we collect depends on how you use our Sites, but, in many cases, it will be Personal Information. 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 create an account, post User-Generated Content, or contact us with questions or comments. 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.

Information Others Provide. Others may also post information about you, primarily (but not exclusively) as User-Generated Content. 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. (<http://www.capella.edu/terms-of-use/>)

Information From Third-Party Social Media Platforms. You may be able to register with, log on to, or enhance your profile on our Sites by choosing to automatically populate the requested data fields with information you previously provided to a third-party social media platform (such as Facebook or Twitter). By doing this, you are asking the third-party platform to send us information, including Personal Information, from your profile on that platform. We treat that information as we do any other information you give to us when you register, log on, or enhance your profile.

Information Sent to Us by Your Web Browser. We collect information that is sent to us automatically by your Web browser or mobile device. 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 website 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. 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 Other Technologies. We use “cookies” and other Web technologies to collect information and support certain features of our Sites. For example, we may use cookies to:

- collect information about the ways visitors use our Sites—which pages they visit, which links they use, and how long they stay on each page;
- support the features and functionality of our Sites—for example, to save you the trouble of reentering information already in our database or to prompt the settings you established on previous visits;
- personalize your experience when you use our Sites; and
- improve our marketing efforts, including through use of targeted advertising.

Information collected by cookies not identify you personally. However, we may link information collected by cookies to information that identifies you personally. 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.

Information About Third-Party Cookies

In addition to the cookies Capella delivers to your computer or mobile device through our Sites, certain third parties may deliver cookies to you for a variety of reasons. For example, we use

Google Analytics, a web analytics tool that helps us understand how visitors engage with our Sites. To learn more about Google Analytics, [click here](#).

Other third parties may deliver cookies to your computer or mobile device for the purpose of tracking your online behaviors over time and across nonaffiliated websites and/or delivering targeted advertisements either on our Sites or on other websites.

You have choices about the collection of information by third parties on our Sites. For example, if you don't want information about your visit to our Sites sent to Google Analytics, you may download an Opt-out Browser Add-on by [clicking here](#). Please note that the Add-on does not prevent information from being sent to Capella.

In addition, if you would like to opt-out of having interest-based information collected by certain entities during your visits to our Sites or other websites, please [click here](#). You will be directed to an industry-developed website that contains mechanisms for choosing whether each listed entity may collect and use data for online behavioral advertising purposes. It may be that some of the third parties that collect interest-based information on our Sites do not participate in the industry-developed opt-out website, in which case the best way to avoid third-party tracking of your online behaviors may be through your browser settings and deletion of cookies.

How We Share Your Information

With Third-Party Service Providers. We may share information collected through our Sites with third parties that perform certain functions on our behalf. For example, we may share 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 service providers are permitted to use any Personal Information we provide to them only to perform services on our behalf and must treat it as strictly confidential.

With Other Users of Our Sites. You may be able to submit User-Generated Content on or through our Sites. Any information contained in UGC can be read, collected, or used by others. In addition, unless the UGC is posted solely to fulfill a course requirement, we may use UGC you submit for advertising campaigns and other promotions. We may or may not use your name in connection with such use, and we may or may not seek your further consent before using the content for such purposes. Therefore, you should have no expectation of privacy with respect to UGC you submit on or through our Sites.

If, at any time, you wish us to remove UGC that you posted, please e-mail us at privacy@capella.edu or call us at 888-227-2736. Although we do not promise to remove UGC simply because we receive a request to do so, we will consider reasonable requests and will remove UGC when applicable law requires us to do so. Please be aware, however, that if the UGC has already been distributed to other websites or published in other media, we will not be able to recapture and delete it.

With Third-Party Social Media Platforms. We may provide functionality on our Sites that allows you to automatically post information about the actions you take on our Sites to a third-party social media platform (such as Facebook or Twitter). If you choose to take advantage of this functionality, people with access to your profile on the third-party platform may be able to see the actions you have taken. Thus, you should have no expectation of privacy in those actions. Further, if you choose to link a profile on one of our Sites with an account on a third-party social media platform, we may share the information in the profile with that third-party platform.

With Other, Carefully Selected Business Partners. From time to time, we may share your information with selected third parties for their own marketing purposes. For example, we may partner with third parties to sponsor contests or other promotions, and we may share with these third parties the information you submit to us to participate in the contest or take advantage of the promotion. Before doing so, however, we may offer you the opportunity to “opt out” or “opt in,” as required by applicable law.

In Aggregate or De-Identified form. We use information collected through our Sites to create a compiled, aggregate view of usage patterns. We may share aggregate information with third parties so they can better understand our user base. We may also share with third parties information about how particular individuals use our Sites, but only on a de-identified basis (“Individualized Data”). Individualized Data is not personally identifiable, but it does reflect the usage patterns of a particular individual, as opposed to site users collectively. We may provide basic demographic information (gender and age) in conjunction with providing Individualized Data. Third parties typically use this information for analytical purposes and to market their own products and services. It is possible that third parties will attempt to “re-identify” de-identified data, and you should know that this is possible using external points of reference.

As Part of a Business Transfer. Your information may be transferred in connection with a corporate sale, purchase, merger, reorganization, liquidation, dissolution, or similar event. If such a transfer occurs, the successor organization’s use of your information will still be subject to this Policy and the privacy preferences you have expressed to us.

To Comply with Laws and Protect Our Rights and the Rights of Others. We may disclose your information when we, in good faith, believe disclosure is appropriate to comply with the reporting requirements of accrediting bodies or the U.S. Department of Education or to comply with the law, a court order or a subpoena. We may also disclose your information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of our Sites; to enforce or apply our online Terms of Use or other agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

As Described in a Privacy Notice or Country-Specific Notice. We reserve the right to disclose your information as described in any Privacy Notice or Country-Specific Notice posted on a page of our Sites where you provide that information. By providing your information on that page you will be consenting to the disclosure of your information as described in the notice. We also reserve the right to disclose your information as described in any click-through agreement to which you have agreed.

How We Protect Your 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.

A Note On Children's Privacy

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 us through our 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.

Links to Third-Party Sites

Some of our Sites link to each other. Our Sites also contain links to websites that are owned and operated by unrelated third parties. For example, Capella.edu links to a government website 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 websites 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 information that we collect through Capella-owned Sites that display a link to our Privacy Center. It does not apply to information collected on any Capella-owned site that does not display a link to our Privacy Center. It does not apply to information collected on the websites of our service providers or other third parties.

When you access a website 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.

Accessing and Correcting Your Personal Information

We strive to maintain the accuracy and integrity of the 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.

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

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.

Definitions

The terms “*Capella*,” “*we*,” “*us*,” and “*our*” refer collectively to Capella Education Company and its wholly owned subsidiaries.

The term “*Personal Information*” refers to information that identifies you personally, alone or in combination with other information available to us.

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

The term “*our Sites*” refers collectively to the websites owned by Capella that display a link to our Privacy Center.

The terms “*User Generated Content*” and “*UGC*” refer all of the text, photographs, images, illustrations, graphics, sounds, video and audio-video clips, and other content you and others post on or through our Sites using the social networking tools that we make available and that does not constitute “Feedback” (as that term is defined in our Terms of Use).

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