

Touro University California Website Privacy Policy

This website is administered by Touro University California. The primary purpose of this website is to be a dynamic resource and educational tool. We want you to feel secure when visiting our site and are committed to maintaining your privacy when doing so.

Thus, Touro University California is committed to protecting the privacy of the personal information of its employees and students, potential employees and potential students, independent contractors, vendors, and other stakeholders. We value the trust of those we deal with, as well as the general public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that you chose to share with us. During the course of our various educational programs and activities, including the maintenance and operation of our website and university, we frequently obtain and use personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of or other dealing with this information is subject to consent. Our privacy practices are designed to achieve this.

The following privacy guidelines apply to the Touro University California website (Site). We invite you to visit our Site to search or browse the site without revealing who you are or registering with us. However, if you choose to give us personal information via the Internet that we may need, it is our intent to let you know how we will use such information. If you tell us that you do not wish to have this information used as a basis for further contact with you, we will endeavor to respect your wishes. However, Touro University California accepts no liability for information supplied via an unsecure connection.

Registration

Registration is not required to gain access to the Site. However, there are sections of the web site which do require a password to grant access to TUC resources such as email, Blackboard, Library Circulation and sites managed by our educational partners.

Collection of IP addresses and the use of "Cookies"

When you visit our Site, some information such as your Internet protocol address, Internet service provider, operating system, the site from which you arrived, and the time and date of your visit may be collected automatically as part of the operation of this Site. This intake of information is not personally identifiable. Touro University California uses this information solely for internal marketing purposes, for example, to see what pages are most frequently visited in order to improve the Site.

We may also collect information through the use of a technology called "cookies." A cookie is a small file that a web site can send to your browser, which is then stored on your system by your browser. The use of cookie technology on Touro University California is solely for internal marketing purposes. If you are uncomfortable accepting cookies from our Site or any other, you can set your browser to notify you when a Site attempts to send you a cookie, giving you the opportunity to decide for yourself whether or not to accept the cookie. You can also set your browser to turn off cookies.

Resume and Data Collection

The Site provides a capability for users to submit their resumes and other data to Touro University California via the internet. Any resume or data so received by Touro University California will be held in confidence and used only for the purpose of considering the submitting party for employment. Such information is not shared with third parties external to Touro University California domestic and international branches. Remember, sensitive and personally identifying information should be password protected when being sent via email.

Children's usage of the Site

This Site is intended for adult use only. It is not intended for children, and we ask that minors not submit any personal information to us.

Nature of Data on the Internet

It is Touro University California's intent to guard any personal information that you submit to us, and Touro University California will continue to take steps to maintain the security of this Site. However, as a multi-national institution, the data we collect from you may be internationally distributed throughout the Touro College and University System (of which Touro University California is a part) and the open nature of the Internet is such that data may flow over networks without security measures and may be accessed and used by people other than those for whom the data is intended. Therefore, in submitting personal information to the Site from an unsecured and unencrypted connection, you assume the risk of a third party obtaining that information. Please do not supply Touro University California with personal information in such a manner.

Personal Information

Any time Touro University California collects information that you voluntarily submit, it is Touro University California's intent to inform you of why this information is being requested and how it is going to be used. We may collect personal information from you including phone, electronic mail address, and other information you choose to provide at various times, for example, when you complete an online form or request. Touro University California uses the personal information we collect online to process your requests, inform you of educational opportunities that we believe you might find interesting, and to understand your needs so that we can provide you with the highest quality education and service. Touro University California intends to protect and secure the personal information that you submit to this Site. Touro University California will not sell, distribute, or give your personal information to any third party without your knowledge and consent. Touro University California shall not be liable for any personal information that you submit to external vendors or to any web site linked to this Site.

Defining Personal Information

Personal information is any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual's opinions or beliefs, as well as facts about, or related to, the individual. Exceptions include directory information and business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories - these are not considered personal information. Where an individual uses his or her home contact information as business contact information as well, we consider that the contact information provided is business contact information, and is not therefore subject to protection as personal information.

Privacy Practices

Various jurisdictions have different laws regarding privacy. This policy contains ten (10) principles associated with privacy legislation. Using each of the ten principles, Touro University California has developed the following practices:

(1) ACCOUNTABILITY

Touro University California is responsible for all personal information under its control.

- The Chief Information Security Officer (CISO) for the Touro College and University System is Patricia Ciuffo. This is communicated both internally and externally for public knowledge. The CISO is responsible for understanding the broad impact of privacy, for the implementation of policies and procedures, and handling any complaints.
- Touro University California is responsible for personal information in its possession or custody.

(2) IDENTIFYING PURPOSES

Touro University California will identify the purposes for which personal information is collected, at or before the time the information is collected.

- The primary purposes for the collection of personal information is to deliver services and to keep individuals informed and up-to-date on the activities of Touro University California, including programs, services, special events, projects, employment opportunities, solicitations and more through periodic contacts.
- When personal information that has been collected is to be used for a purpose not initially identified, the new purpose shall be identified prior to use.
- Personal information may be supplied in connection with a job application or educational inquiry, whether advertised on this website or otherwise, you may provide us with information about yourself, such as a resume or curriculum vitae. We may use this information throughout Touro University California and its related entities for the purpose of employment consideration or your educational inquiry. Except where you tell us not to, we will keep the information for future consideration.
- If you request something from our website, for example, course materials, educational information, a callback, or specific marketing materials, we will use the information you provide to fulfill your request. To help us do this, we may share information, with others, for instance, other parts of Touro University California, its educational partners, financial institutions, shipping companies, postal or government authorities (for example, financial aid processors) involved in fulfillment. In connection with a transaction we may also contact you as part of our customer satisfaction surveys or for market research purposes.
- The information you provide to Touro University California on our websites may also be used by Touro University California and selected third parties for marketing purposes. However, as you will notice on our marketing emails we will offer you the opportunity to choose whether or not to opt-out of having your information used in this way.
- If you represent a Touro University California educational partner, you may visit a Touro University California website intended specifically for Touro University California educational partners. We may use information provided on that site to administer and develop our relationship with you, the partner you represent, and other partners generally. For instance, this may involve using your information to send you details of Touro University California partner or affiliated programs. In connection with a particular transaction or program, we may also contact you as part of student satisfaction surveys or for market research purposes.
- If you represent a Touro University California supplier, vendor or consultant, you may visit a Touro University California website intended specifically for use by you. We may use the information provided on that site in connection with entering into or performing a transaction with you. For example, this may include sharing information with other parts of Touro University California, Touro University California's partners, , financial institutions, government authorities involved in our offerings. It may also be used to administer and develop our relationship with you, the entity or consultants you represent and/or other Touro University California vendors and suppliers generally.

(3) CONSENT

Knowledge and consent by the individual for the collection, use and disclosure of personal information will be obtained by Touro University California. Indeed, your submission/input of your personal information is tacit consent to collection, use and disclosure of personal information obtained by Touro University California.

- This privacy policy is therefore provided in a prominent manner and specifies the nature of the information uses. You have the ability to notify Touro University California to opt-out at any time (subject to later agreed to legal or contractual restrictions and reasonable notice).
- As you can readily discern, this consent is stated in such a manner that individuals supplying personal information can reasonably understand how the information will be used or disclosed.

(4) LIMITING COLLECTION

The collection of personal information shall be limited to that which is necessary for the purposes identified by Touro University California. All personal information shall be collected by fair and lawful means.

- Touro University California does not collect personal information indiscriminately. Both the

amount and type of information collected is limited to that which is necessary to fulfill the purposes identified.

- Any new purposes for the use of an individual's personal information will require the individual's consent.
- We will only collect personal information by fair and lawful means and we will never collect information by misleading or deceiving individuals about the purpose for which information is being collected. Thus we require and obtain your consent with respect to collection, use or disclosure and never will we obtain such consent through deception.

(5) LIMITING USE, DISCLOSURE AND RETENTION

- Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.
- Personal information will be stored in confidence and accessed only by authorized Touro University California employees, faculty and agents or consultants retained by Touro University California.
- Personal information will be retained only as long as necessary for the fulfillment of those purposes.

(6) ACCURACY

By supplying your personal information you affirm that such information is accurate, complete and up-to-date as is necessary for the purposes for which it is used by Touro University California, taking into account its use and the interests of the individuals.

- Personal information shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information be used to make a decision about the individual.
- Touro University California will update an individual's personal information only when necessary to fulfill the specific purposes for which it was collected.

(7) SAFEGUARDS

Touro University California will take steps to protect personal information from theft and loss, as well as unauthorized access, disclosure, copying, use or modification. The methods of protection include:

- Physical measures (locked filing cabinets, restricted access to files and offices);
- Technological measures (passwords, encryption, firewalls, and audits);
- Organizational measures (clearances, "need-to-know" access, etc.); and
- Staff training that includes the sharing of all Touro University California privacy policies and procedures.

(8) OPENNESS

Touro University California will make readily available to individuals specific information about Touro University California's policies and practices relating to the management of personal information. Touro University California will make these policies and practices understandable and easily available through a variety of forms, including this very posting. Information about these policies and practices may be made available in person, in writing, in publications and, as you can see, on the Touro University California website. The information made available will include:

- the name or title and business address of the person who is accountable for Touro University California's privacy policies and practices and to whom complaints or inquiries can be forwarded;
- the means of gaining access to personal information held by Touro University California;
- a description of the type of personal information held by Touro University California, including a general description of its use and disclosure.

(9) INDIVIDUAL ACCESS

Upon request by an individual, Touro University California shall inform the individual of the existence, use and/or disclosure of his or her personal information and be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

- Individuals have the right to be given access to their personal information (except where it

contains references to other individuals or if it cannot be disclosed for legal, security or commercial proprietary reasons). Touro University California will advise the individual of the reason for denying the access request.

- Touro University California will respond to an individual's request within a reasonable time and at minimal or no cost to the individual related to retrieval, photocopying and delivery.
- In providing an account of third parties to which it has disclosed personal information about an individual, Touro University California will attempt to be as specific as possible. When it is not possible to provide a list of the organizations to which it has actually disclosed information about an individual, Touro University California will provide a list of organizations to which it may have disclosed information about the individual.

(10) CHALLENGING COMPLIANCE

An individual can challenge Touro University California's compliance with the above principles through the Chief Information Security Officer.

- Touro College and University receives and responds to complaints or inquiries about its policies and practices relating to the handling of personal information. To initiate a complaint, all an individual must do is notify the Chief Information Security Officer at CISO@touro.edu and provide information regarding the nature of the complaint, the date it occurred, and the individual or entity it is with [who, what, where, when, why], and assistance to allow Touro University California to properly investigate the claim.
- Touro University California shall investigate all complaints. If a complaint is found to be justified, Touro University California will take appropriate measure, including, if necessary, amending its policies and procedures.

CONTACT

If you have any specific questions, comments or challenges with respect to our privacy policy or compliance, please contact Touro College and University System's Office of Institutional Compliance:

- by email at elan.baram@touro.edu
- by phone at 212.463.0400 x5636
- or by mail at: 43 West 23rd Street, New York, New York 10010

IMPORTANT NOTE:

By submitting any information to Touro University California and using or viewing this website the individual agrees to submit all controversies, claims, and disputes that may arise between the individual and Touro University California to expedited binding arbitration. INDIVIDUAL APPRECIATES AND UNDERSTANDS THAT OTHER OPTIONS SUCH AS FEDERAL AND STATE ADMINISTRATIVE AND JUDICIAL REMEDIES MAY EXIST; THAT BY CONSENT THOSE REMEDIES ARE FOREVER PRECLUDED; AND THAT REGARDLESS OF THE NATURE OF THE COMPLAINT, INDIVIDUAL KNOWS THAT THE COMPLAINT CAN ONLY BE RESOLVED THROUGH ARBITRATION. INDIVIDUAL CONSENTS AND AGREES, CLEARLY AND UNAMBIGUOUSLY, TO ARBITRATE ANY AND ALL DISPUTED CLAIMS AND BY VIEWING AND USING THIS SITE THE INDIVIDUAL IS ACCEPTING THIS ARBITRATION PROVISION. INDIVIDUAL WAIVES THE RIGHT TO A TRIAL BY JURY OR PROCEEDING BY WAY OF CLASS ACTION. INDIVIDUAL KNOWINGLY AND VOLUNTARILY AND WITHOUT DURESS OR COERSION CONSENTS TO THIS ARBITRATION REQUIREMENT. This consent to binding arbitration covers and includes: any contract or tort claims, privacy claims (both statutory and common law), and claims of discrimination or harassment. The binding arbitration described in this paragraph shall be conducted by the American Arbitration Association ("AAA") in Vallejo, CA pursuant to the Federal Arbitration Act and utilizing AAA's Commercial Rules or its National Rules for the Resolution of Employment Disputes, as applicable. Any party may request arbitration. Requests to arbitrate must be filed with the other party and with AAA within ninety (90) calendar days after the claim or dispute arises or the act or acts as to which arbitration is brought occur. If an individual fails to file a request for arbitration with Touro University California and AAA within ninety (90) calendar days after the claim or dispute arises, that claim or dispute it will be conclusively resolved against the individual even if there is an applicable statute of limitations that may have given the individual more time. Any judgment upon the award rendered by the arbitrator may be entered in any court of competent jurisdiction.