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**THE TRUSTEES OF TRINITY COLLEGE**
**PRIVACY POLICY**

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**Trinity College Policy No. 6.3**

**Policy Statement**

Individual privacy is important to Trinity College ("College"). This policy defines the College's framework for the protection of sensitive and personally identifiable information it collects, maintains, and uses, including the circumstances under which such information may be disclosed to others.

This policy applies to all Trinity College technology resources that are owned or managed by the College, that connect to the College network, that connect to another College technology or service, or that store College data or information. This policy applies to all College faculty, staff, students, contractors, and any other entity or individual using College information, technology resources, or data.

**Definitions**

*Data*

"Data" means any data or information, regardless of format – electronic or printed – or location, that is created, acquired, processed, transmitted, or stored on behalf of Trinity College. College data includes the data processed or stored by the College in hosted environments in which the College does not own or operate the technology infrastructure. The term *data* may be used interchangeably with the term *information* in this standard.

*Data Classification*

Data Classification refers to the categorization of College data and the consistent application of data handling requirements based on such categorization.

*Data Handling*

Data Handling refers to the actions that data users should take to use, process, transmit, store, archive, and destroy data in a secure manner that aligns with the classification of the data.

*Technology Resources*

"Technology resources" means:
- any computer or electronic resources that are used in the search, access, acquisition, transmission, storage, retrieval, or dissemination of Trinity College data;
- any technologies or services that are owned or managed by the College, that connect to the College network, connect to another College technology or service, or store College data or information; and
- any services or applications used by the College in hosted environments in which the College does not own or operate the technology infrastructure.

**Privacy Policy**

Trinity College is committed to protecting individual privacy. Trinity College understands that information is entrusted to the College for specific purposes related to its academic mission and respects the privacy of its students, faculty, and staff. Notwithstanding the foregoing, Trinity College may disclose information for legitimate business purposes, such as in the course of investigations and litigation, in response to subpoenas, for the proper functioning of the College, to protect the safety and welfare of individuals or the community, and as otherwise required or permitted by law.

The normal operation and maintenance of the College's technology resources require backup and caching of data and communications, the logging of activity, automatic monitoring of general usage patterns, and other such activities. College personnel may, with or without further notice to users, take any action deemed necessary to preserve, protect, and promote the interests of the College, its technology resources, or College data. The College may access and monitor its technology resources for any lawful purpose consistent with the College's duties or mission without notice.

**Privacy Principles**

We are dedicated to upholding the highest ethical standards in the collection, use, and protection of personal information. We will adhere to the following principles with respect to the collection and use of data:

- **Transparency**: We will be transparent about how we collect, use, and share personal information. We will provide clear and concise explanations of our data privacy practices.
- **Choice**: Where feasible, we will give individuals the ability to control how their personal information is collected, used, and shared.
- **Security**: We will take appropriate technical and organizational measures to protect personal information from unauthorized access, use, disclosure, alteration, or destruction.
- **Compliance**: We will comply with all applicable laws and regulations regarding the collection, use, and protection of personal information.
- **Accountability**: We will be accountable for ensuring that our data privacy policy is implemented and followed, and we will take appropriate action to address any violations of our policy.

End-users of College data are expected to be good stewards of the College's data, understand and apply College data classification levels, and handle College data (regardless of form) in a safe, responsible, ethical, and legal manner.
- Additional requirements regarding acceptable use are found in the College's Acceptable Use Policy
- Additional requirements regarding appropriate data handling are found in the College's Standard on Data Classification.

The College will develop, document, implement, and periodically update an information security program to protect the data entrusted to it.

- Additional information about the information security program is found in the College's Policy on Information Security.

The College will maintain a privacy notice on its main website describing its data collection and use practices.

**Additional Guidance for Special Situations**

Trinity College has adopted policies governing specific categories of data. To the extent that there is a conflict between this policy and any policy regarding a specific category of data, the specific policy will apply:

- Notice of Policies Regarding Student Access to Education Records protected by the Family and Educational Rights and Privacy Act of 1974 (FERPA)
- Policy on Background Checks
- Acceptable Use Policy
- Information Security Policy
- Policy on the Management of College Records
- Student Handbook
- Faculty Manual
- Employee Handbook
- Privacy Notice

**Responsibilities**

The roles and responsibilities for the administration of this policy include:

*President*

The President of the College has general responsibility and control of all the business and affairs of the College. The President and the President's Executive Leadership Team are accountable for providing executive oversight and support of campus policies and standards.

*General Counsel*

The General Counsel is responsible for providing guidance and advice on the interpretation of this policy and on any procedures for its implementation.

*Vice President for Library and Information Technology Services*

The Vice President for Library and Information Technology Services is responsible for overseeing the implementation and enforcement of the College's information security program and for providing guidance to Trinity College leadership concerning the appropriate use of data and information resources.

*Vice Presidents, Deans, Department Heads, and Supervisors*

Vice Presidents, Deans, Department Heads, and Supervisors are responsible for ensuring that units, staff, and end-users adhere to the standards of behavior outlined in this policy and in other policies regarding the use of data at Trinity College.

*End-Users*
All end-users of College technology resources, including students, faculty, and staff, are responsible for adhering to the standards of behavior outlined in this policy and in other policies regarding the use of data at Trinity College.

## Compliance
Violations of this policy or any law related to the use of College technology resources or College data, including, but not limited to the Family Educational Rights and Privacy Act of 1974 (FERPA), and the Gramm-Leach-Bliley Act (GLBA), may result in disciplinary action in accordance with the Student Handbook, Faculty Handbook, Employee Handbook, as appropriate, and/or any other applicable rules governing employment at Trinity College.

## Responsible Officer
Vice President for Library and Information Technology Services or a designee appointed by the President

## Key Offices to Contact Regarding the Policy and Its Implementation
Questions or clarifications regarding this policy should be reported to: privacy@trincoll.edu

**The effective date of this policy is: 2/23/2026**