

# **PRIVACY POLICY**

## **FULL VERSION**

Updated: June 14, 2016

This policy applies to website visitors, current and potential students, alumni and any other user of services offered through our Sites, including any websites or mobile applications operated by or on their behalf. This policy applies to both online and offline collection, storage, processing and transfer of Personal Information.

Veterinary Technical Institute may amend or otherwise modify this Privacy Policy at any time, so please revisit this page periodically to check for updates. The date of last revision is shown at the top of this document.

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## 1. Definitions

As used in this Privacy Policy, the following terms have the following meanings:

“Business Associates” means third-party, service providers which Veterinary Technical Institute may contract with to provide services on our behalf, including but not limited to: Social Networking, hosting, web analytics, Online Behavioral Advertising, lead generation, academic, business, career or financial services.

“Do Not Track” or “DNT” means a browser based signal that, when set, signifies an Internet user’s desire not to be tracked online.

“Education Partners” means a.) VetKey, AVC Succes, VetThinkLab and affiliates including educational companies or institutions that Veterinary Technical Institute may be providing educational or other related services to under contract and b.) Third-party companies who may participate in Veterinary Technical Institute career initiatives (e.g., potential employers).

“Financial Information” means specific Personal Information of a financial nature such as your credit card number.

“Information” means any Information collected and includes: “Personal Information,” “Financial Information,” “Web Analytical Information” or any other Information collected from you through our Sites.

“Personal Information” means Information that may be used, alone or in combination, to identify a specific individual and includes Financial Information.

“Online Behavioral Advertising” means the collection of data from a particular computer or device regarding web-viewing behaviors over time and across websites for the purpose of using such data to predict user preferences or interests to deliver advertising to that computer or device based on the preferences or interests inferred from such web-viewing behaviors.

“Site” or “Sites” means websites operated by or exclusively on behalf of Veterinary Technical Institute regardless of domain name or IP address.

“Social Network” means various Internet communication technologies provided on Sites that facilitate conversation and interaction between people online and includes, but is not limited to, blogs, discussion forums, wikis, chat sessions, news groups, etc.

“Social Network Content” (or “SNC”) means user-generated content you consent to share via a Social Network and includes, but is not limited to, Personal Information, digital sounds and pictures that you upload to a Social Network. It also includes your Personal Information that may be displayed on other users’ Social Network pages.

“Your School” means Veterinary Technical Institute.

“We,” “us” and “our” refer to Your School.

“Unrelated Entities” means third-parties that are not Education Partners and who are not providing services as Business Associates.

“Web Analytical Information” means Internet-generated Information we collect when you visit our Sites or open emails sent by us. This Information may be linked with Personal Information.

When linked with other Information identifying you personally, either alone or in combination with other Information, then such Information also will be considered Personal Information.

## **2. How We Collect Information**

We collect various types of Information from you through our Sites and other websites where you can express interest in our services, through our mobile applications, via email, over the phone, via printed forms and in person. Some Information is collected automatically through various web and Internet technologies including Social Networking tools used by your School. Other Information is collected when you provide it to us voluntarily.

We may also obtain Information from Education Partners, Business Associates and Unrelated Entities and combine that with Information we collect about you.

## **3. Information Collected Automatically on the Sites**

Each time you visit one of our Sites, or open one of our emails, Web Analytical Information is automatically gathered. In general, this Information does not identify you personally. Examples of Web Analytical Information include, but are not limited to:

- IP address
- Collection date
- Publisher name
- Connection speed
- Day of week, time of day (hour)
- Language settings
- Country, state, designated market area (DMA), city (relating to IP address, if available)
- Domain (.com, .net, .mil, .org, .edu, etc.)
- Web pages viewed
- Email clicks or other actions taken
- This Information may be linked with Personal Information to accomplish the purposes described in this Privacy Policy.

## **4. Information You Provide to Us**

In addition to the Web Analytical Information automatically collected when you visit our Sites, Veterinary Technical Institute also collects, uses and discloses Personal Information that you provide to us voluntarily online or offline when you respond to an advertisement, a survey or a request for information; register for classes; apply for financial aid; order educational or other products and services; set up a Social Network or other Site profile; or use one of our career resources, learning assessments or other interactive tools. While the exact nature of the Personal Information may vary depending on the type of response or service requested, the following is a non-exclusive list of the types of Information that may be collected to the extent it is necessary and applicable for the intended purposes:

- First, middle and last name, previous names
- Street address, city, state, country, postal code
- Date of birth

- Place of birth
- Gender
- Race
- Ethnicity
- Country of origin
- Employment history
- Native language
- Address type
- Email address
- Valid day or evening telephone number
- Cell phone number
- Confirmation of the age of majority
- Education Partner interested in
- Current diploma program of interest
- Publisher code (Site ID)
- Citizenship
- Number of previous credits earned or attempted
- Military affiliation
- Credits earned
- Prior education history
- Certificate, licensure or other professional information
- High school diploma or GED
- Lead source
- Individual Record Number (IRN) or Social Security number
- Credit card number
- Other Financial Information and information related to financial aid eligibility
- Social Networking content
- Learning, skill or career assessment data
- Career goals
- Video and / or audio media
- Other Information after you become a student such as course assignments, grades and other educational records relating to your enrollment at your School and that may be required to be collected in the normal course of your studies

## **5. How We Use and Disclose This Information**

We will not sell, rent or lease your Personal Information to others except in accordance with this policy.

We may collect, use and disclose Personal Information for the following purposes:

- To determine your admissibility and to register you for your selected educational programs
- To contact you regarding your status with the School
- To provide requested products and services
- To respond to your inquiries and provide customer support
- To administer promotions in which you have indicated an interest

- For our internal marketing purposes, which include, but are not limited to, sending you material about products, services, updates, etc. that we think may be of interest to you
- For fostering communication and collaboration among members of your School community through Social Networks
- For sharing with our Education Partners who may contact you with respect to their educational or other services
- For sharing with our Education Partners or Business Associates who are performing services on our behalf
- To analyze how Sites and services are being accessed and used
- For investigation of information security and information asset protection-related incidents
- To test, correct and improve our content, applications and services
- To develop new applications, products and services
- For Online Behavioral Advertising purposes
- To improve Site and service performance and delivery
- To prevent potentially illegal activities (including illegal downloading of copyrighted materials in accordance with our Copyright Policy)
- To investigate suspicious information that denotes illegal activity such as financial aid fraud
- To analyze academic and learning outcomes and preferences
- For external academic research and scholarship done by Business Associates or Unrelated Entities
- To analyze risk and business results
- To obtain payment for services that we provide to you
- To provide you with information concerning arrangements and other options for the repayment of funds loaned to you for your education
- To maintain educational and business records for reasonable periods
- To enforce our Terms of Use
- To provide to Education Partners, Business Associates or Unrelated Entities in connection with the contemplated or actual reorganization, merger, acquisition, financing, securitization, insuring, sale or other disposal of all or part of our business or assets, including for the purposes of determining whether to proceed with such transaction or fulfilling any records or other reporting requirements to such parties. In the event of any actual reorganization, merger or acquisition, such Information may be transferred as part of the transaction to the acquirer
- And/or as may be required or permitted by legal, regulatory, industry self-regulatory, insurance, audit or security requirements applicable to the School, our Education Partners or our Business Associates

## **6. Express Consent to Receive Prerecorded Voice Messages and/or Text Messages**

If you have provided prior express written consent in the process of requesting information from the School about its educational offerings or services, or if you have provided prior express consent after

becoming a student to receive communications related to purposes other than marketing, prerecorded voice messages, and text messages to communicate with you.

In the case of text communications, you may receive text messages periodically regarding Veterinary Technical Institute. Message and data rates may apply. You may opt out at any time by texting STOP to cancel future text messages. By sending STOP, you agree to one additional confirmation message stating that you've opted out and will no longer receive text messages from Veterinary Technical Institute. To get help, text HELP. You may also get additional support or help by sending an email to [info@VTISchool.com](mailto:info@VTISchool.com) or by calling: (239) 592-1219.

By consenting to receive texts you specifically authorize Veterinary Technical Institute to send text communications or receive a call with a prerecorded voice. Your participation and/or your consent is not a condition of purchasing any goods or services. Your consent also provides authorization for the specific telephone number that may be contacted via this program.

#### Financial Information

Your Financial Information will be used to provide requested products and services, to analyze operational and business results, to analyze risk, and for concluding your registration or other transaction you have initiated with us. It will not be sold, rented or otherwise transferred to an Education Partner, Business Associate or Unrelated Entity outside of these purposes, except in the case of a reorganization, merger or acquisition of our shares or assets.

## 7. Student Educational Records

If you become a student, your educational records are subject to the U.S. Federal Family Educational Rights and Privacy Act (FERPA), state laws and your School's policies. Students have the right to limit access to FERPA-defined directory Information about them.

You may also contact us via one of the below methods:

Mail: Veterinary Technical Institute

Attn: Registration Office

4061 Bonita Beach Rd. 103-C

Bonita Springs, FL 34134, US

Phone: (239) 592-1219

Email: [info@VTISchool.com](mailto:info@VTISchool.com)

## 8. Location of Information Processing

We operate or may process information in multiple jurisdictions, and some Education Partners and Business Associates may be located outside of the jurisdiction in which you reside. In such cases, your Personal Information may be collected, used, disclosed, stored and processed in these other jurisdictions for the purposes described in this Privacy Policy. The data protection and other laws of the United States

and other countries might differ from your jurisdiction. We require our Education Partners and Business Associates to use your Personal Information in accordance with this policy and to take reasonable steps to ensure that your privacy is protected in accordance with applicable laws.

## **9. Do Not Track and Online Behavioral Advertising**

Do Not Track (DNT) is a browser based signal that, when set, signifies your desire not to be tracked online. Because there is not yet a consensus on how companies should respond to web browser-based or other DNT mechanisms, neither Veterinary Technical Institute respond to web browser-based DNT signals.

We or our Business Associates may use data collected on this site for online behavioral advertising purposes, e.g., to customize ads to you on other websites as you browse the web. If you do not want your browsing behavior on the Sites to be collected for Online Behavioral Advertising purposes, you can set preferences for how Google advertises to you using the Google Ad Preferences page and if you prefer, you can manage cookies in your web browser or permanently using a browser plugin. Veterinary Technical Institute does not use any personally identifiable information (PII) for advertising purposes.

## **10. Opt Out**

### **Marketing Communications**

If you do not wish to receive marketing email communications from us, you may express your choice where indicated on the applicable email or other communication or unsubscribe.

If you do not wish to receive marketing telephone calls or mailings, you may express your choice to opt-out by emailing [info@VTIschool.com](mailto:info@VTIschool.com)

Marketing opt-out requests will only remove you from our list and the list of any Business Associate performing services on our behalf. We are not responsible for the use any other party may make of the Information once it has been transferred in accordance with this Policy, and you will need to contact such entity to have your Information removed from its database.

### **Student Educational Records and Social Networking Content**

Students who desire to prevent release of their directory and educational record Information in accordance with FERPA may place a FERPA Hold on their academic file.

You may change various user settings related to sharing your Personal Information contained in any user profile you set up as part of Social Network activities furnished by us, subject to contractual, academic, legal or technical restrictions and reasonable notice. Note that your withdrawal from Social Network activities might prevent us from providing you with certain products or services.

### **Other Collection, Use and Disclosure**

In any situation not covered by the foregoing, you may be able to opt out of our collection, use and disclosure of your Personal Information subject to applicable contractual, academic, legal or technical restrictions and reasonable notice. Note that if you opt out of certain uses of your Personal Information,

we may no longer be able to provide certain products or services. For more information on your ability to opt out, email the Registration Office.

We provide Florida residents the ability to opt out of disclosures to Education Partners for direct marketing purposes. To opt out of these disclosures at no cost, email: [info@VTIschool.com](mailto:info@VTIschool.com)

## **11. Our Security Measures**

We will take commercially reasonable measures to secure and store your Information to protect against the loss, misuse and alteration of the Information under our control. We utilize industry-standard security measures when accepting your credit card Information during the online ordering process, as well as whenever we ask you to log in to any of our Sites.

Unfortunately, no data transmission over the Internet can be guaranteed to be completely secure. As a result, although we will utilize such measures, we do not guarantee you against the loss, misuse or alteration of Information under our control, and you provide Information to us at your own risk. You should always take care how you handle and disclose your Personal Information and should avoid sending Personal Information through insecure email, Social Networks or other Internet channels.

## **12. Monitoring of Communications**

We may monitor and retain all incoming and outgoing communications for training of our representatives and for quality assurance purposes. To the extent such communications are selected, they are only retained as long as necessary to adequately discharge these purposes, unless a specific communication needs to be retained for legal reasons.

## **13. Internet Technologies Used**

Cookies, web beacons and other relevant Internet technologies are used in our emails and on our Sites to allow us to accomplish the uses set out above as well as to deliver Sites messaging and to keep track of your Information. These small pieces of program code reside in your computer and browser and can be removed. If you desire to remove such technologies you may do so, but this may render our Sites unusable to you. You can opt out of cookies or the other Internet technologies used by disabling these features in your browser program. Please note that the deletion of certain opt-out cookies may require you to renew your Online Behavioral Advertising opt outs periodically. Consult your browser's Help menu for assistance in changing cookie settings or removing cookie files.

## **14. Site Hosting and Links from Our Sites to Other Websites**

Some of our Sites may contain links to websites hosted by Education Partners, Unrelated Entities and Business Associates operating websites on their own behalf or on behalf of multiple entities. Some of

these websites may collect your Personal Information and may apply their own policies on how your Personal Information is used. In addition, some of our Sites may have Additional Policies that apply to the use of Personal Information collected on that Site. Please make sure to read the policies of any websites you visit on the Internet carefully. Please be aware that we are not responsible for the privacy practices or the content of any websites that are not operated by or exclusively for us, and the collection, use and disclosure of Information about you will be subject to the policies applicable on those websites.

## **15. Privacy Policy Changes**

Veterinary Technical Institute may update this Privacy Policy or revise it from time to time. You should contact us as described below or check back at this Site periodically to obtain a current copy of this Privacy Policy. We urge you to review this Privacy Policy frequently to obtain the current version. Your continued provision of Personal Information or use of our services following any changes to this Privacy Policy constitutes your acceptance of such changes. If we intend to use Information that personally identifies you in a manner materially different from what we stated at the time it was collected, we will attempt to notify you at least 30 days in advance. You will be given a choice as to whether or not previously provided Information may be used in a new way.

## **16. How to Access Your Information and Contact Us**

If you want access to or wish to update any of your Personal Information or have any questions about our privacy practices, please contact our Registration Office.

### **MAIL**

Veterinary Technical Institute  
4061 Bonita Beach Rd. 103-C  
Bonita Springs, FL 34134, US

### **EMAIL**

[info@VTIschool.com](mailto:info@VTIschool.com)

### **PHONE**

(239) 592-1219