

Touro College Website Privacy Policy

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

Thus, Touro College is committed to protecting the privacy of the personal information of its employees, potential employees, faculty, independent contractors, vendors, suppliers, students and other stakeholders. We value the trust of those we deal with, and of the 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 college, 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.

Touro College has adopted this privacy policy in order to ensure users of our commitment and dedication to privacy. The following privacy guidelines apply to the website (Site). Touro College respects your right to privacy. 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. You may only supply personal information to our website if you are utilizing a secure and encrypted internet connection, Touro College accepts no liability for information supplied via an unsecure or unsecure wireless 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, some examples include the intranet subsites.

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 software operation of this Site. This intake of information is not personally identifiable. Touro College uses this information solely for internal marketing purposes, for example, to see what pages are most frequently visited in order to improve the Site. After it is used for internal marketing purposes, this information is discarded.

We 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 College 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 Collection

The Site provides a capability for users to submit their resumes to Touro College via email. Any resume so received by Touro College 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 College domestic and international branches. Remember, resume submission should be conducted with a secure and encrypted internet connection only.

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 College's intent to guard any personal information that you submit to us, and Touro College 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 Touro College 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 College with personal information in such a manner.

Personal Information

Any time Touro College collects information that you voluntarily submit, it is Touro College'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 College 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 College intends to protect and secure the personal information that you submit to this Site. Touro College will not sell, distribute, or give your personal information to any third party without your knowledge and consent. Touro College 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 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 that we have found form the backbone much privacy legislation. Using each of the ten principles, Touro College has developed the following practice:

(1) ACCOUNTABILITY

Touro College is responsible for all personal information under its control and remains responsible when personal information is processed by third parties on their behalf.

- The Chief Information Security Officer (CISO) for Touro College 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 College is responsible for personal information in its possession or custody, including information that has been received by a third party and requiring their adherence to privacy legislation.

(2) IDENTIFYING PURPOSES

Touro College 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 College, 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 College 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 College, Touro College's Educational Partners, financial institutions, shipping companies, postal or government authorities (for example, immigration or customs authorities) 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 College on our websites may also be used by Touro College and selected third parties for marketing purposes. We may use it, 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 College Educational Partner, you may visit a Touro College website intended specifically for Touro College 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 College partner or alliance programs. It may also include sharing certain information with other Business Partners (subject to any confidentiality obligations that may exist), or Touro College students or prospects. 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 College supplier, vendor or consultant, you may visit a Touro College 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 College, Touro College's partners, shipping companies, financial institutions, postal or government authorities involved in fulfillment. It may also be used to administer and develop our relationship with you, the entity or consultants you represent and/or other Touro College 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 College. Indeed, your submission of your personal information over a secure and encrypted internet connection is tacit consent to collection, use and disclosure of personal information obtained by Touro College.

- 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 College 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 College. All personal information shall be collected by fair and lawful means.

- Touro College 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.

(4) 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 College employees, faculty and agents or consultants retained by Touro College.
- Personal information will be retained only as long as necessary for the fulfillment of those purposes. Personal information that is no longer required will be destroyed, erased or made anonymous in accordance with current Touro College Document/Records Retention Policy.

(5) 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 College, 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 College will update an individual's personal information only when necessary to fulfill the specific purposes for which it was collected.

(6) SAFEGUARDS

Touro College 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, encryptions, firewalls, and audits);
- Organizational measures (clearances, "need-to-know" access, etc.); and
- Staff training that includes the sharing of all Touro College privacy policies and procedures.

(7) OPENNESS

Touro College will make readily available to individuals specific information about Touro College's policies and practices relating to the management of personal information. Touro College 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, by telephone, in publications and, as you can see, on the Touro College website. The information made available will include:

- the name or title and business address of the person who is accountable for Touro College'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 College;

- a description of the type of personal information held by Touro College, including a general description of its use and disclosure.

(8) INDIVIDUAL ACCESS

Upon request by an individual, Touro College 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 College will advise the individual of the reason for denying the access request.
- Touro College 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 College 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 College will provide a list of organizations to which it may have disclosed information about the individual.

(9) CHALLENGING COMPLIANCE

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

- Touro College has put these procedures in place to receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal information. The complaint procedures is accessible and simple to use. To initiate a complaint all an individual must do is notify Chief Information Security Officer and provide information and assistance to allow Touro College to properly investigate the claim.
- Touro College shall investigate all complaints. If a complaint is found to be justified, Touro College will take appropriate measure, including, if necessary, amending its policies and procedures.

(10) CONTACT

If you have any specific questions, comments or challenges with respect to our privacy policy or compliance, please contact Touro College's Office of the General Counsel:

- by email at michael.newman@touro.edu
- by phone at 212.463.0400 x5127
- or by mail at: 43 West 23rd Street, New York, New York 10010

Further information on privacy and your rights in regard to your personal information may be found on our website

IMPORTANT NOTE:

By submitting any information to Touro College and using or viewing this website the individual agrees to submit all controversies, claims, and disputes that may arise between the individual and Touro College 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. INDIVIDUAL KNOWINGLY AND VOLUNTRILY 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 Edison, New Jersey 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 College 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.