



SNAAP SURVEY PRIVACY POLICY

PURPOSE

The SNAAP survey is an online survey, data management, and institutional improvement system designed to enhance the impact of arts-school education. SNAAP provides national data on how artists develop. SNAAP helps identify the factors needed to better connect arts training to artistic careers, and allows education institutions, researchers, and arts leaders to look at the systemic factors that help or hinder the career paths of arts-school alumni.

COMMITMENT TO PRIVACY

SNAAP takes individual privacy seriously. This privacy policy (“Privacy Policy”) provides important information about individual privacy in connection with communication and use of SNAAP survey systems and software. *NOTE: This policy is concerned with the protection of personally identifiable information only.*

This policy describes the following practices:

- Collecting personal information
- Sharing personal information
- Securing and maintaining personal information

GENERAL

This Privacy Policy governs only the information (a) collected by SNAAP from a Participating Institution, (b) voluntarily provided by a survey Participant and (c) provided to SNAAP by a Third Party (e.g., AlumniSync, or a similar alumni tracking company, or an educational institution), etc.) about a person in connection with their communication with or use of SNAAP. It does not cover any other information collected in any other manner, or by any other entity, unless specifically stated. Where a person has provided their personal information to third parties such as affiliated entities, marketing companies, platform operators, technology providers, including Third Party Services, and have agreed to share that information with us, we may obtain such personal information and combine it with the information we collect, and, if we do so, our use of the resulting combined information will be subject to this Privacy Policy.

When we use the term “Personal Information” we mean any information that we collect that would allow someone to identify a person or contact them, such as their full name, address, e-mail address, or telephone number. When we use the term “Additional Information”, we mean any information that we collect other than Personal Information (Personal Information and Additional Information shall be collectively referred to as “Information”).

Please note that certain of our agreements with an affiliated Institution may, in certain instances, limit some of the terms and conditions of this Privacy Policy (e.g., limiting our use of certain Personal Information, etc.) absent our provision of additional notice to a Participant or our obtaining additional consent, as the case may be.

INFORMATION WE COLLECT



Participating institutions may provide SNAAP with protected participant data elements pursuant to a survey Participation Agreement (e.g., first and last name, gender, mailing address, phone number, email address, degree pursued, major, level of degree pursued, cohort or graduation year, department/school/college information, and other information chosen by Participating Institution).

FERPA Compliance. In connection with all Personally identifiable FERPA protected information that SNAAP may receive from a participating Institution pursuant to a survey Participation Agreement, SNAAP is designated by the Participating Institution as a school official with a legitimate educational interest in and with respect to such FERPA Records, to the extent to which SNAAP is required to receive or maintain FERPA Records to carry out the Institution Participation Agreement. Personally identifiable FERPA protected information that SNAAP may receive from a participating Institution is the property of the participating Institution and will not be used or sold by SNAAP for any purpose not directly related to the services outlined in the Institution Participation Agreement without the written permission of the Institution.

Informed Consent. In order to participate in the survey services provided by SNAAP, Individual Participants will be provided an IRB approved Informed Consent disclosure and requested to provide specific personal information about them, such as name, address, telephone number and e-mail address. By agreeing to the Informed Consent and using SNAAP's survey software and services, the participants acknowledge that they will be voluntarily providing SNAAP with information about them in the course of answering questions about them posed through the survey software, that may be considered to be personal information – all such personal information will be stored and maintained in accordance with this privacy policy.

Occasionally, SNAAP will obtain information about prospective participants from Third Parties, such as mailing list providers, or third-party application or account providers. Third Parties providers are responsible for obtaining consent for the release of personal information to SNAAP from those individuals identified on mailing lists, surveys, or through other collection methods.

In the event that a person deletes their account with a Third Party, SNAAP will retain any Information provided by that Third Party service. Similarly, if a person requests to delete or remove their Personal Information on SNAAP, any Information that SNAAP has shared with Third Party services (in accordance with this Privacy Policy) may be retained by those Third Party services.

HOW WE USE INFORMATION

SNAAP uses reasonable precautions to protect Personal Information and store it securely. Access to a person's Personal Information is restricted to those authorized personnel who need it, and SNAAP takes commercially reasonable steps to prevent the unauthorized use or disclosure of Personal Information. SNAAP may combine a person's information with other information into a de-identified aggregate form, so their information no longer personally identifies them. SNAAP may then disclose the de-identified aggregate information to third parties, so they can obtain an overall picture of SNAAP services and reports.



SHARING AND DISCLOSURE OF INFORMATION

SNAAP provides a person's personal information to third parties only for purposes to which they have consented – which consent shall be deemed if a person provides an Informed Consent and chooses to respond to surveys or questionnaires through the SNAAP software and services. SNAAP reserves the right to use, share, disclose and/or sell any anonymous aggregated de-identified data that SNAAP collects in connection with a participant's use of the SNAAP, including, but not limited to, for the purposes of Research described in Sections above. An Institution may obtain their own affiliated participant's Personal Information from SNAAP and be able to use their affiliated Participant's Personal Information in accordance with this Privacy Policy.

SNAAP provides participant information to third parties only for purposes to which a participant has consented – which consent shall be deemed if a participant voluntarily provides Informed Consent and chooses to respond to surveys or questionnaires through the SNAAP software and services – and we require such third parties to keep participant information confidential.

In a few situations, SNAAP may be required to disclose individual participant information without their prior consent. For example, SNAAP may disclose participant information if SNAAP is required to do so by law, or if SNAAP believes in good faith that such disclosure is necessary to:

- Comply with law or legal process.
- Protect and defend SNAAP's rights and property, or the rights and property of a third party.
- Protect against deleterious misuse or unauthorized use of any of SNAAP products, software, services, or other proprietary materials.
- Protect the personal safety of any person.
- Allow for a change of ownership of SNAAP and associated transfer of all personal information to the new owner of SNAAP – this does not affect the protection of your information under this Privacy Policy.

The SNAAP survey may provide a participant and other user with an opportunity to voluntarily provide a narrative or open-ended response and comment on the SNAAP survey or software which may, at their discretion, include information that can be classified as, or associated with, Personal Information. SNAAP Informed Consent authorizes SNAAP to disclose any such Personal Information relating to a participant that they voluntarily provide in connection with the SNAAP survey or software to their affiliated institution, and by voluntarily submitting such narrative or open ended information or comment on the SNAAP, such a participant affirmatively consents to the distribution of such Personal Information to their affiliated institution in the context of that response or comment and have no additional expectation of privacy or confidentiality in connection therewith.

Participants acknowledge that once voluntarily submitted, their narrative or open-ended responses and comments may be distributed to their affiliated institution with access to such



content and information, and that the SNAAP does not completely control who at their affiliated institution views or distributes such content and information. Accordingly, a participant should not submit, post, publish or otherwise make available any such responses or comments they wish to remain private or confidential or which may contain any sensitive information.

SECURITY

SNAAP contracts with Indiana University's Center for Survey Research (CSR) to provide security for SNAAP software, data, and survey administration. The servers storing SNAAP data are managed by CSR. The computing environment at CSR requires and maintains a high level of computer and data security per *IU information and information technology (IT) policies* at: <https://policies.iu.edu/information-it/index.html>. CSR has robust physical, electronic, and procedural security system safeguards and uses industry standard best practices as its security procedures.

SNAAP survey participant information is encrypted in transit and at rest. CSR uses 2048-bit public key encryption with a 128-bit SSL connection to ensure the security of survey and other sensitive data that are transmitted across the Internet. The security procedures used by CSR are equal to or surpass the requirements for transmitting confidential information.

SNAAP strictly limits access to protected SNAAP data to its own employees, contractors, and those individuals who are authorized by SNAAP for the proper handling of such information.

SNAAP's sole obligation is to maintain security respecting communicated personal information while such information is within SNAAP systems.

PRIVACY POLICY CHANGES

This privacy policy may change from time to time to reflect SNAAP internal needs, user and institutional feedback or changes in applicable privacy legislation. SNAAP will post all such changes on our website, so please visit this page regularly.

From time-to-time SNAAP may modify this Privacy Policy to reflect industry initiatives or changes in the law, our Information collection and use practices, the features of the SNAAP, or technology, and such modifications shall be effective upon posting. It is therefore important that participants review this Privacy Policy regularly to ensure they are updated as to any changes. If SNAAP materially changes its practices regarding collection, use or disclosure of participant Personal Information, such Personal Information will continue to be governed by the privacy policy under which it was collected unless a participant has been provided notice of, and has not objected to, the change.

ACCURACY

It is a participant's responsibility to give SNAAP current, complete, truthful, and accurate information, including Personal Information, and to keep such information up to date. SNAAP cannot and will not be responsible for any problems or liability that may arise if a participant



does not give SNAAP accurate, truthful, or complete information or Personal Information or a participant fails to update such information or Personal Information. SNAAP will reject and delete any entry that SNAAP believes in good faith to be false, fraudulent, or inconsistent with this Privacy Policy.

INDIVIDUAL RIGHTS

SNAAP has established the following practices regarding the maintenance of an individual participant's personal information.

A participant can request access to their personal information at any time.

If, for any reason, a participant wishes to review their personal information that SNAAP has in its possession, that person can contact the SNAAP Privacy Officer, who will be pleased to provide a participant with their personal information that SNAAP has on file.

Sometimes, it may be necessary for a participant to update their personal information SNAAP has on file. A participant can request changes to their personal information at any time. If they wish to make any changes or corrections to their personal information, please contact the SNAAP Privacy Officer who will implement the changes. This will help us ensure SNAAP records are always up to date.

A situation may arise where a participant desires to have all of their personal information that is contained in SNAAP's records deleted or destroyed. If this is what they wish, they should contact the SNAAP Privacy Officer, who will take care of removing their personal information from all of SNAAP's records. However, there may be situations where SNAAP is obligated to retain one archival copy of a person's information to allow SNAAP to comply with laws or respond to legal processes. SNAAP will inform the participant of all such situations, and will only use a participant's retained personal information to the limited extent necessary to comply with such laws or respond to legal processes.

CONTACTING SNAAP PRIVACY OFFICER

If a person has any questions about our privacy practices or any of the terms or conditions of this Privacy Policy, please feel free to contact SNAAP at privacy@snaaparts.org or by mail:

Lee Ann Scotto Adams
SNAAP Privacy Officer
P.O. Box 25682
Providence, RI 02905

This privacy policy supplements any agreements you already have with SNAAP or a participant's affiliated Institution. SNAAP privacy policy does not replace the terms of those agreements. Unless otherwise prohibited by law, by agreeing to those terms and using SNAAP's website, surveys, software, and services, participants are consenting to the collection and use of their personal information by SNAAP. in accordance with this privacy policy.