

**Privacy Policy for the Parking System for**

Master of Science

Information Technology

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## Privacy Policy for the University Parking System

Effective Date: March 31, 2025

Last Updated: April 12, 2025

This Privacy Policy explains how the University Parking System (“we,” “our,” or “the System”) collects, uses, shares, and protects your personal information when you register and use the parking services provided by the university.

By using the University Parking System, you agree to the terms outlined in this Privacy Policy.

### THE BUSINESS

This Privacy Policy is between you and the following organization:

- Company Name: DU Parking & Mobility Services
- Address: University of Denver, 2199 S. University Blvd, Colorado, 80208
- Phone: 303-871-2706
- E-Mail: [Steven.Veloff@du.edu](mailto:Steven.Veloff@du.edu)
- Website URL: [https://duparking.t2hosted.com/cmnauth\\_ext.aspx](https://duparking.t2hosted.com/cmnauth_ext.aspx)
- Website Name: University of Denver - Customer Authentication
- Mobile App Name: DU Parking
- Available on: Apple App Store (iOS) + Google Play Store (Android)

### PERSONAL INFORMATION COLLECTED

#### *Identifiers*

Full name or alias, University-issued ID, University email address, home phone number or mobile phone number, postal address, bank account number, credit card number, debit card

number or other financial information, driver's license number or state identification card number, passport number, or other similar identifiers.

#### *Protected Classification Characteristics*

Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Commercial Information. Records of personal property, products or services purchased, obtained considered, or other purchasing or consuming histories or tendencies.

#### *Inferences Drawn From Other Personal Information*

Profile reflecting a person's preference characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Biometric Information. Genetic, physiological, behavioral, and biological characteristics or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

#### *Geolocation Data*

Physical location or movements. For example, city, state, country, and ZIP code associated with your IP address or derived through Wi-Fi triangulation; and, with permission in on your mobile device settings, and precise geolocation information from GPS-based functionality on your mobile devices.

*Emergency Contact Information*

Such as the name phone number, address, and e-mail address of another person in the context of having an emergency contact on file. Personal information necessary for us to collect and retain to administer benefits for you and another person relating to you (e.g., your spouse, domestic partner, and dependents) such as their name, Social Security Number, date of birth, telephone number, e-mail, and address.

*Non-Public Education Information (per the Family Educational Rights and Privacy Act (20 U.S.C Section 1232g, 34 C.F.R Part 99)*

Educational records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records. Hereinafter known as “Personal Information.”

*Creating a User Profile or Account*

We may collect information directly from you or an agent authorized to act on your behalf. For example, if you or someone acting on your behalf provides your name and e-mail to create a profile or an account. We also collect information indirectly from you or your authorized agent. This can be done through information we collect from you while providing content products or services.

COOKIES POLICY

Currently, our website and mobile app uses cookies to provide you with the best experience possible. We, in addition to our service providers affiliates, agents, advertisers, or other parties in connection with the website and mobile app, may deploy cookies, web

beacons, local shared objects, and other tracking technologies for various purposes such shall be for business use marketing purposes fraud product prevention, and to assist in the day-to-day operations of the website and mobile app.

- **“Cookies” Defined:** Cookies act as data that is communicated between the users' web browser and a website or application. They are stored in your device to help track their areas of interest, provide the best experience possible and customize the content, products, services offerings, and advertisements served on the website and mobile app. Most web browsers adjust to your browser's settings to decline or delete cookies, but doing so may degrade the experience with our online services.
- **1-Pixel Images:** Clear GIFs, pixel tags, or web beacons, which are generally 1-pixel, are transparent images located on a web page or in an e-mail or other trackable source and may be used on our website and mobile apps in addition to any other communication offered by us. They are often used in connection with advertisements served to you that are interacted with, whether on our website and mobile app or another offline service and shared with us. This type of tracking is specifically meant to recognize users, assess traffic patterns, and measure site or campaign engagement.
- **Flash Cookies:** Local Shared Objects, sometimes known as “flash cookies” may be stored on your device using a media player or other software. Flash cookies are similar to cookies in terms of their operation but may be managed in your browser in the same manner.
- **1st Party & 3rd Cookies:** First (1st) party cookies are stored by a domain (website and mobile app) you are visiting directly. They allow us to collect analytics data, remember

preferred settings (e.g., language, currency, etc.) and perform related functions. 3<sup>rd</sup> party cookies are created by domains other than those you are visiting directly, hence its name “3<sup>rd</sup> party.” They may be used for cross-tracking and retargeting and ad-serving.

- **Essential Cookies:** Such cookies are technically necessary to provide website and mobile app functionality. They act as a basic form of memory used to store the preferences selected by a user on a given website or application. They are essential to browsing functionality and cannot be disabled users. As an example, an essential cookie may be used to recognize a past user from having to log in each time they visit a new page in the same session.
- **Performance and Function Cookies:** Such cookies are used to enhance the performance and functionality of a website and mobile app but are not essential to its use. However, without these cookies, certain functions (like videos) may become unavailable.
- **Advertising Cookies:** Such cookies are used to customize a user's ad experience on a website and mobile app. When using data collected from cookies, it can prevent the same ad from appearing multiple times in the same session or that does not offer a pleasant experience. Advertising cookies may be used to serve a user with related services, products, or offerings that they may have shown a level of related interest in their past user history.
- **“Do Not Track” (“DNT”):** We may revise this policy if a standardized response protocol is established and adopted. In the meantime, you can opt out of tracking and certain types of targeted advertising through industry-standard methods such as:
  - Adjusting cookie settings in your browser.



- Using opt-out tools provided by the Network Advertising Initiative and the Digital Advertising Alliance.

If you would like to know more about cookies and how they're used please visit

[www.allaboutcookies.org](http://www.allaboutcookies.org).

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

#### HOW WE USE PERSONAL INFORMATION

We may use or disclose your Personal Information for the following purpose:

- **Feedback:** To get feedback on website and mobile app improvements and generally provide an overall better experience.
- **Testing:** For testing, research, and analysis, of user behavior on the website and mobile app.
- **Protection:** To protect against fraud, safeguard data, and the general security of the website and mobile app.
- **Security:** To detect security incidents, verify human users, and avoid being subject to malicious, deceptive, fraudulent, or illegal activity.
- **Law Enforcement:** To respond to law enforcement requests as required by applicable law, court order, or governmental regulations.
- **Intended Purpose:** As described for the intended purpose when collecting your personal information.

- **Assessment:** To evaluate or conduct a merger, divestiture, restricting, reorganizing, dissolution, or outright sale, either wholly or partially, of our assets in which your Personal Information becomes a part of such sale.

Our usage of your Personal Information may change over time, and when such changes occur, we will update this Privacy Policy accordingly.

#### SELLING PERSONAL INFORMATION

Our policy is that we DO NOT sell your personal information. If this should change, you will be notified and this Privacy Policy will be updated.

#### SHARING PERSONAL INFORMATION

We disclose your Personal Information to 3<sup>rd</sup> parties for business purposes. The general categories of 3<sup>rd</sup> parties that we share are as follows:

- Our 3<sup>rd</sup> party service providers that, without their services, our website and mobile app would not be able to function in its current manner;
- Affiliated websites and businesses in an effort to bring you and our users improved services, products, and offerings;
- 3<sup>rd</sup> parties to whom you, or an authorized agent on your behalf, authorized us to disclose your Personal Information;
- 3<sup>rd</sup> parties or affiliates in connection with a corporate transaction, such as a sale, consolidation, or merger of our financial institutions or affiliated business; and
- Other 3<sup>rd</sup> parties to comply with legal requirements or to disclose Personal Information to government authorities per the rule of law.

In the last 12 months, it is recognized that we have disclosed the aforementioned categories of Personal Information for business purposes.

#### RIGHT AND CHOICES

This Section describes your rights and choices regarding how we collect, share, use and protect your Personal Information, how to exercise those rights, and limits and exceptions to your rights and choices.

- **Exceptions:** The rights and choices in this Section do not apply to you if the information being collected is:
  - Aggregate consumer information;
  - Deidentified Personal Information; and
  - Publicly available information.
- **Access to Information:** If the above exceptions do not apply, and you have not made this request more than once in a 12-month period, You have the right to request that we disclose certain information to you about your collection and use of your personal information over the past 12 months from the date we receive your request. Once we receive and confirm your request on your behalf, we will disclose it to you or your representative:
  - The categories of Personal Information we collect;
  - The categories of sources for the Personal Information we collect;
  - Our business or commercial purpose for collecting or selling such Personal Information;

- The categories of third parties to whom we sold or disclosed the category of Personal Information for a business or commercial purpose;
  - The business or commercial purpose for which we sold or disclosed the category of Personal Information; and
  - The specific pieces of Personal Information we collected about you in a form that you can take with you (also called “Data Portability Request”).
- **Deletion (Erasure) Request Rights:** You have the right to request that we delete any of your Personal Information that we collect from you and retain, subject to certain exceptions. Once we receive and verify your request, we will delete and direct our service providers to delete your Personal Information from our records unless an exception applies. We may deny your deletion request if retaining the Personal Information is necessary for us or our service providers to:
    - Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
    - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those for such activity;
    - Debug to identify and repair errors that impair existing intended functionality;
    - Exercise free speech, or exercise another right provided by law;
    - Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws

when the businesses' deletion of the Personal Information is likely to render impossible or seriously impair the achievement of such research if you previously provided informed consent;

- Enable solely internal and lawful uses of such Personal Information that are compatible with the context in which you provided it.
- **Exercising Access, Data Portability, and Deletion Rights:** To exercise the access, data portability, deletion rights, or any other rights mentioned herein, a consumer or a consumer's authorized agent may submit a verifiable request to us by using the contact details mentioned herein.
- **Requests:** You may only make a verifiable consumer request for access or data portability in relation to this Section. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information is related to you.

Making a verifiable customary request does not require you to create an account with us. We will only use Personal Information provided via a verifiable consumer request to verify the requester's identity or authority to make the request.

- **Authorized Agent:** An authorized agent is any person or legal entity registered with the Secretary of State or similar office that you have authorized to act on your behalf. If a request is made by an authorized agent acting on your behalf, we may require the following:
  - Submission of evidence by you with your permission for the authorized agent to submit a verifiable request on your behalf;

- For you to directly acknowledge, via electronic communication, that the authorized agent is allowed to act on your behalf;
- Require the authorized agent to verify their identity; or
- For a power of attorney document to be submitted that is signed in accordance with state law.

We reserve the right to deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf and cannot verify their own identity to us.

- **Response Timing and Format:** As required under privacy laws, we agreed to respond to any verifiable consumer requests within 45 days of its receipt. If we require more time, with a maximum of 90 days, we will inform you, in writing, of the reason. Such notification will be by e-mail unless there is another preferred communication method provided.

If applicable, the response we provide will also explain the reasons we cannot comply with the request. For data portability requests, we will select a format to provide your Personal Information that is readily usable and should allow you to transmit the Personal Information from one entity to another entity without hindrance.

No fee will be charged to process or respond to your verifiable consumer request.

- **Right of Non-Discrimination:** We do not discriminate against you for exercising any of your rights in this Privacy Policy and under applicable laws. Unless permitted by law, we will not:
  - Deny you goods or services;

- Charge you different prices or rates for goods, services, and offerings, including through granting discounts or other benefits, imposing penalties; or
- Provide you with a different level of quality of goods or services.

#### CHANGES AND AMENDMENTS

We reserve the right to amend this Privacy Policy at our discretion and at any time.

When we make changes to this Privacy Policy, we agree to notify you by e-mail or other preferred communication methods.

#### LINKING TO 3RD PARTIES

We may provide links to 3<sup>rd</sup> party sources such as websites, applications, content, or software (“3<sup>rd</sup> Parties”). When you use a link online to visit 3<sup>rd</sup> Parties, you will be subject to their privacy policy and the jurisdiction of governing law. It is recommended to familiarize yourself with its terms and disclosures regarding your Personal Information. We are not responsible for the landing of your Personal Information when using, accessing, or visiting 3<sup>rd</sup> Parties.

#### SECURITY & PROTECTION

We use reasonable physical, electronic, and procedural safeguards that comply with federal standards to protect and limit access to Personal Information. This includes device safeguards used in accordance with industry standards. We use reasonable physical, technical, and administrative safeguards to protect your Personal Information from unauthorized access, use, loss, misuse, disclosure, or destruction. These measures include but are not limited to encryption, secure socket layer (SSL) technology, password protection, access controls, firewalls, intrusion detection, and regular security assessments. Despite our efforts, no method of

transmission over the Internet or electronic storage is 100% secure. Therefore, we cannot guarantee absolute security. If a data breach affecting your Personal Information occurs, we will notify you in accordance with applicable laws.

#### CONTACT

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Information, your choices, or your rights regarding such use, or wish to exercise your rights, please do not hesitate to contact us by using the details mentioned in this Privacy Policy.