

INTERNET2 WEBSITE PRIVACY STATEMENT

Last Updated: November 13, 2024

Effective Date: December 12, 2024

INTRODUCTION

This Internet2 Website Privacy Statement (“**Privacy Statement**”) outlines Internet2’s (“**Internet2**,” “**we**,” “**us**,” or “**our**”) practices with respect to information collected from community members and others (“**you**,” “**your**,” or “**Visitors**”) who access websites operated by Internet2 located at either <https://www.internet2.edu> or <https://ms-cc.org/> (collectively, the “**Website**”). Please carefully review this Privacy Statement, as it assists in enhancing your understanding of our privacy practices. If you have any questions about how your Personal Information is being used, you can contact us through the contact methods provided at the end of this Privacy Statement.

We value your privacy and are committed to protecting your privacy interests. This Privacy Statement describes the types of information we collect and how we collect, use, disclose, and safeguard it, and your rights concerning it.

Personal Information refers to details that can identify you, such as your name, address, phone number, email, or company name. Information that is public, aggregated (e.g., statistics), or de-identified (i.e., stripped of identifiers) is not considered Personal Information for the purposes of this Privacy Statement.

Specifically, this Privacy Statement covers:

- The types of Personal Information we may collect from you when you visit our Website;
- The purposes for collecting this information;
- The methods by which information, including your Personal Information, might be used and disclosed; and
- The security measures we undertake to prevent the misuse of data collected by Internet2.

Our Website may contain links to other websites. Please be aware that Internet2 is not responsible for the data collection and privacy practices of third parties and third-party websites. We encourage you to be cautious when you leave our Website and to read the privacy statements of other websites that may collect information from you.

Internet2 may provide separate privacy notices that apply to specific data collection activities, in which case this Privacy Statement does not apply. Where this Privacy Statement does apply, we also may provide additional or supplemental privacy notices at the time of data collection, and those supplemental privacy notices will govern how we may process the information collected at

that time. In the event of a conflict between any supplemental notices and this Privacy Statement, the supplemental notices will take precedence.

PERSONAL INFORMATION WE COLLECT

Internet2 collects Personal Information from Visitors in two ways: (i) automatically when you navigate through our Website, and (ii) directly from you, such as when you submit an inquiry, connect with us, or complete an online transaction.

A. INFORMATION WE COLLECT AUTOMATICALLY WHEN YOU NAVIGATE THROUGH OUR WEBSITE

Automatic Technologies Used on our Website

We use cookies, web beacons, and similar technologies on our Website to track use of our Website in order to improve its performance, ensure we are providing content that is of interest to Visitors, and to make our Website more user-friendly.

Web Beacons: Small, transparent images embedded in emails or web pages to track interactions and analyze Website traffic.

Cookies: Text files sent from a web server to your browser and may be stored by your browser or on your device's hard drive.

The text file is then sent back to the server each time the browser requests a page from that server. Our cookies cannot read data off your hard drive and will not damage your system. Specifically, our Website utilizes the following types of cookies:

- **Functionality Cookies**: These cookies allow our Website to remember choices you make. For example, these cookies can remember your search preferences and any associated filters, so you don't have to reset them each time you use the search feature.
- **Analytics Cookies**: Our Website utilizes various third-party analytic tools to enhance Visitor experience and improve our services. These tools help us gather and analyze information about how Visitors interact with our Website. The data collected may include IP addresses, browser types, internet service providers, referring/exit pages, and timestamps. We use this information solely for statistical purposes to (i) understand trends, (ii) analyze Website traffic, (iii) track Visitor movement around our Website, and (iv) gather demographic information. For more information on how analytics data provided by you to us, is collected, disclosed, and used we recommend reviewing the Privacy Policies provided by our third-party providers:
 - [Google Analytics](#)
 - [Pardot](#)
 - [Meta Analytics](#)

Types of Personal Information Collected by Automatic Technologies

We may collect Personal Information about your computer system and your interactions with our Website to enhance your browsing experience and improve our services. This information includes, but is not limited to:

- **IP address and geographical location:** To address technical issues and understand regional distribution.
- **Domain type:** Recording the type of domain you use helps us gather demographic information.
- **Browser type:** We track the browser you use to optimize compatibility across different platforms.
- **Referral source:** Knowing how you found our Website assists in refining our marketing strategies.
- **Visit details:** Including visit duration, date, time, page views, and downloaded materials, to analyze engagement and content relevance.
- **Material downloaded:** Monitoring the materials you download provides feedback on our resources' relevance and popularity.
- **Other Website activity:** We track various activities on our Website to ensure functionality and security.

Managing Cookies:

You have the option to configure your browser to refuse any cookie or to notify you when a cookie is being sent. Please note, if you choose to refuse cookies you will need to refuse cookies on each browser and device you used to connect to the Website. If you refuse all cookies, some portions of the Website may not function optimally.

Below are links to information about managing your cookie preferences in common browsers:

- [Google Chrome Cookies](#)
- [Mozilla Firefox Cookies](#)
- [Internet Explorer Cookies](#)
- [Safari Cookies](#)
- [Microsoft Edge Cookies](#)

Google Analytics. We utilize Google Analytics to identify how Visitors engage with the Website and to provide us with information regarding our Visitors. For more information about Google Analytics, how it collects and processes Personal Information, and instructions on opting out of Google Analytics using a specific plug-in, please visit the following link:

<https://tools.google.com/dlpage/gaoptout>. Note that Google's opt-out mechanism is specific to Google activities.

How We Respond to "Do Not Track" Signals. Please note that your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services that you visit. There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, Internet2 does not alter its practices when it

receives a “Do Not Track” signal from a Visitor’s browser. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

B. INFORMATION WE COLLECT DIRECTLY FROM YOU

When you use our Website to register for any Internet2 or Internet2-hosted event, make an inquiry, report a problem, join one of our mailing lists, complete an online form, or register to use certain online services (e.g., the Internet2 Wiki), you may be asked to provide information, including Personal Information, such as your name; organization affiliation and/or position; home, business and/or billing address; telephone number; email address; and credit or debit card number. If you do not want us to collect your Personal Information, please do not provide it to us.

Credit or debit card numbers are used solely for payment processing. We use Braintree, Inc. for this, and your data is protected under Braintree’s security and privacy policies. Braintree is PCI DSS Level 1 compliant. For more details, visit <http://www.braintreepayments.com/security>.

Recipients of promotional emails from Internet2 have the option to unsubscribe from future messages via a link provided at the bottom of each email. However, it's important to note that we regularly communicate with our Visitors via email. For example, we may use your email address to confirm your request or to provide notices and other disclosures required by law. While you generally cannot opt out of these communications, they will primarily serve transactional or relationship purposes rather than promotional purposes.

Please note that separate privacy policies containing more service-specific details are applicable to certain areas of the Internet2 Website, such as Event Registration, and these policies are available at <https://internet2.edu/community/about-us/policies/>. Additionally, all policies pertaining to InCommon, which is operated by Internet2, can be found on the InCommon website located at <https://incommon.org>, and is not covered by this Privacy Statement.

C. NO INFORMATION FROM CHILDREN UNDER 13

Internet2 does not knowingly collect or solicit Personal Information from anyone under 13 years of age. Our services and Website are not directed to children under the age of 13. If for any reason we become aware that we have collected the Personal Information of a child under 13 without parental consent, we will delete the information. If you believe we may have any information from a child under 13, please contact us using the information provided at the bottom of this Privacy Statement.

HOW WE USE YOUR PERSONAL INFORMATION:

Internet2 collects Personal Information for various reasons, including:

- Recording traffic flows and monitoring Website usage;
- Improving Website functionality by providing personalized experiences, such as filling in forms;

- Conducting research on Visitors' demographics, interests, behaviors, and technology based on use of our Website and information you provide to us to enhance our Visitors' experiences.
- Facilitating communication with you or your organization, such as responding to inquiries, informing you about Internet2 initiatives and services, seeking feedback to improve services, or for other direct communication purposes; and
- Utilizing data as disclosed to you at the time of collection.

Please note that deidentified information also is utilized as described above and in other ways as permitted by applicable laws, including combining it with Personal Information. When we merge deidentified information with Personal Information, the combined data is treated as Personal Information for the purposes of this Privacy Statement. This means that we may be using and disclosing this combined data in the same manner as we use and disclose Personal Information.

HOW WE DISCLOSE AND RETAIN YOUR PERSONAL INFORMATION

Internet2 retains information for as long as necessary to offer our services to you or as required by applicable law. Unless otherwise specified herein or at the time of collection, Internet2 will not give, sell, or provide access to your Personal Information to any company, individual, or organization. However, we may disclose your Personal Information with the following organizations for the following purposes:

- **Disclosure to Unaffiliated Third-Party Contractors/Agents/Service Providers:** We may disclose your information with third party contractors or agents of Internet2 for those third parties to fulfill their contractual obligations to us or to you or your organization. In such cases, we seek contractual assurances that the information is protected and used strictly for purposes within the scope of the contract.
- **Event Registration Information:** Certain information you give us in connection with registration for an event, including workshops, webinars, and in-person events jointly hosted with third parties, may be disclosed with event attendees, sponsors, and other members of the research and education community. Additionally, event attendee lists may be posted on the event website. For more information on our privacy practices with respect to event registration information, including ways in which you can opt out of such disclosure, please visit <https://internet2.edu/policies/privacy-event-registration/>.
- **Corporate Reorganization:** Your information may be disclosed to third parties as part of any corporate reorganization process including, but not limited to, mergers, acquisitions, and sales or transfers of all or some of our assets.
- **Law Enforcement Requests & Fraud Prevention:** We may disclose the information you give us with a government agency or other entity to comply with the law or in the good faith belief that such action is necessary in order to conform to the requirements of law, comply with legal process served on us, or protect and defend our rights or property and to protect against fraud.

IMPORTANT INFORMATION ON DATA TRANSFERS AND PROCESSING

Internet2 is based in the U.S., and our Website is hosted there. Personal Information you provide may be transferred to, stored, and processed by Internet2 or our service providers in the U.S. or other countries.

By using our Website, you consent to the transfer and processing of your Personal Information as described in this Privacy Statement. We take reasonable measures to protect your data and ensure it is handled securely on our servers or those of our service providers.

If you do not agree to the transfer of your Personal Information, please refrain from using our Website or providing your information.

HOW WE SAFEGUARD YOUR INFORMATION

Internet2 is dedicated to safeguarding your Personal Information through a comprehensive approach. We use advanced encryption technologies and secure server configurations to protect your data, restrict access to authorized personnel based on their roles, and enforce stringent physical security measures at our facilities.

While we implement these measures, no method of transmission over the Internet or any network can be guaranteed as 100% secure. We disclaim liability for any loss, misuse, alteration, or unauthorized disclosure of your Personal Information. If a security breach affects you, we will attempt to notify you electronically as required by law.

If you have any questions about the security of your Personal Information, you can contact us via the contact information provided below.

VIDEO CONTENT DISCLAIMER

The Website may contain video content, audiovisual content, or content of a like nature (collectively, “**Video Content**”). Video Content is provided for the purpose of enhancing the Visitor experience within the Website and is, therefore, provided in connection with our providing our services. Internet2 is not in the business of renting, selling, or delivering Video Content in a commercial manner. By using the Website, you agree that Internet2 is not a “video tape service provider” as defined in the Video Privacy Protection Act (“**VPPA**”), 18 U.S.C.A. § 2710.

YOUR PRIVACY RIGHTS

California’s Shine the Light Law:

California residents have the right to request information about the Personal Information we disclose to third parties for their direct marketing purposes. We do not share your Personal Information with third parties for their direct marketing purposes.

Nevada Disclosure: Residents of Nevada have the right to opt-out of the sale of certain pieces of their information sold to third parties. Currently, we do not engage in such sales. If you are a Nevada resident and would like more information about our data practices, please contact us by email at: privacy@internet2.edu.

UPDATES AND CHANGES TO THIS PRIVACY STATEMENT

As our Website and communications practices evolve, we may update this Privacy Statement to reflect changes in the manner in which we handle your information, whether to comply with applicable regulations, self-regulatory standards, or otherwise.

The Privacy Statement posted here will always be current, with the effective date posted at the top of this page. We encourage you to review this Privacy Statement regularly, as any use of the Website following an update will be governed by the updated Privacy Statement as posted.

HOW TO CONTACT US IF YOU HAVE QUESTIONS

If you have any questions about this Privacy Statement, please contact privacy@internet2.edu or send mail to:

Internet2
Attn: General Counsel
1150 18th Street NW, Suite 750
Washington, DC 20036