# Cookie Policy of bennington.edu

To find more information on California consumers and their privacy rights, Users may read the privacy policy.

To find more information on Virginia consumers and their privacy rights, Users may read the privacy policy.

To find more information on Colorado consumers and their privacy rights, Users may read the privacy policy.

To find more information on Connecticut consumers and their privacy rights, Users may read the privacy policy.

To find more information on Utah consumers and their privacy rights, Users may read the privacy policy.

This document informs Users about the technologies that help this Website to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with this Website.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent, depending on the applicable law. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

This Website uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

# Activities strictly necessary for the operation of this Website and delivery of the Service

This Website uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

# **Third-party Trackers**

# **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on this Website in a centralized fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

#### Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

In order to understand Google's use of Data, consult their partner policy and their Business Data page.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

# Other activities involving the use of Trackers

# **Experience**

This Website uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

# Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Website. The interaction and information obtained through this Website are always subject to the User's privacy settings for each social network. This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on this Website isn't being connected back to the User's profile.

#### X Post button and social widgets (X Corp.)

The X Post button and social widgets are services allowing interaction with the X social network provided by X Corp.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy.

Storage duration:

• personalization\_id: 2 years

# Interaction with online survey platforms

This type of service allows Users to interact with third-party online survey platforms directly from the pages of this Website. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

#### Hotjar Poll & Survey widgets (Hotjar Ltd.)

The Hotjar Poll & Survey widgets are services that enable interaction with the Hotjar platform provided by Hotjar Ltd. Hotjar honors generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's <u>opt-out information here</u>.

Personal Data processed: Trackers, Usage Data and various types of Data.

Place of processing: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

- \_hjAbsoluteSessionInProgress: 30 minutes
- \_hjCachedUserAttributes: duration of the session
- \_hjClosedSurveyInvites: 1 year
- \_hjDonePolls: 1 year
- hjFirstSeen: duration of the session
- hjIncludedInSessionSample: 30 minutes
- \_hjLocalStorageTest: duration of the session
- \_hjMinimizedPolls: 1 year
- \_hjSession\*: 30 minutes
- \_hjSessionRejected: duration of the session
- \_hjSessionResumed: duration of the session
- \_hjSessionTooLarge: 1 hour
- \_hjSessionUser\*: 1 year
- \_hjSessionUser\_\*: 2 years
- hjShownFeedbackMessage: 1 year
- hjTLDTest: duration of the session
- \_hjUserAttributesHash: duration of the session
- hjViewportId: duration of the session
- \_hjid: 1 year

# Measurement

This Website uses Trackers to measure traffic and analyse User behaviour to improve the Service.

# **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics 4 (Google LLC)

Google Analytics 4 is a web analysis service provided by Google LLC ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting Google's official documentation.

In order to understand Google's use of Data, consult their partner policy and their Business Data page.

Personal Data processed: number of Users, session statistics, Trackers and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Storage duration:

- \_ga: 2 years
- \_ga\_\*: 2 years

#### Meta Events Manager (Meta Platforms, Inc.)

Meta Events Manager is an analytics service provided by Meta Platforms, Inc. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on this Website.

Personal Data processed: country and Trackers.

Place of processing: United States – Privacy Policy – Opt out.

Storage duration:

• \_fbp: 3 months

#### Heat mapping and session recording

Heat mapping services are used to display the areas of this Website that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyze web traffic and keep track of User behavior. Some of these services may record sessions and make them available for later visual playback.

#### **Hotjar Heat Maps and Recordings (Hotjar Ltd.)**

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd. Hotjar honors generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's opt-out information here.

Personal Data processed: Trackers, Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

# Storage duration:

- \_hjAbsoluteSessionInProgress: 30 minutes
- \_hjCachedUserAttributes: duration of the session
- \_hjClosedSurveyInvites: 1 year
- \_hjDonePolls: 1 year
- \_hjFirstSeen: duration of the session
- \_hjIncludedInSessionSample: 30 minutes
- \_hjLocalStorageTest: duration of the session
- \_hjLocalStorageTest: duration of the session
- \_hjMinimizedPolls: 1 year
- hiSession\*: 30 minutes
- hjSessionRejected: duration of the session
- hjSessionResumed: duration of the session
- \_hjSessionTooLarge: 1 hour
- \_hjSessionUser\*: 1 year
- \_hjSessionUser\_\*: 2 years
- \_hjShownFeedbackMessage: 1 year
- \_hjTLDTest: duration of the session
- hjUserAttributesHash: duration of the session
- hjViewportId: duration of the session
- \_hjid: 1 year

# **Marketing**

This Website uses Trackers to deliver personalised marketing content based on User behaviour and to operate, serve and track ads.

# Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Website, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Website. For more information, please check the privacy policies of the relevant services. Services of this kind usually allow Users to opt out of such tracking. Users may learn how to opt out of interest-based advertising more generally by visiting the relevant opt-out section in this document.

# Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta Audience Network with actions performed on this Website. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy – Opt out.

Storage duration:

• \_fbp: 3 months

• fr: 3 months

# How to manage preferences on this Website

Users can set or update their preferences via the relevant privacy choices panel available on this Website.

With regard to any third-party Trackers, Users can manage their preferences and withdraw their consent (TO BE REMOVED) via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

# How to control or delete Cookies and similar technologies via your device settings

Users may use their own browser settings to:

- See what Cookies or other similar technologies have been set on the device;
- Block Cookies or similar technologies;
- Clear Cookies or similar technologies from the browser.

The browser settings, however, do not allow granular control of consent by category.

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- Google Chrome
- Mozilla Firefox
- <u>Apple Safari</u>
- Microsoft Internet Explorer
- Microsoft Edge
- Brave
- Opera

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

#### How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by <u>YourOnlineChoices</u> (EU and UK), the <u>Network</u> <u>Advertising Initiative</u> (US) and the <u>Digital Advertising Alliance</u> (US), <u>DAAC</u> (Canada), <u>DDAI</u> (Japan) or other similar services.

Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

# **Consequences of denying the use of Trackers**

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help this Website to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

# **Owner and Data Controller**

Bennington College One College Drive Bennington, VT 05201-6003

Owner contact email: website@bennington.edu

Since the use of third-party Trackers through this Website cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by this Website.

# **Definitions and legal references**

#### Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### **Usage Data**

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

# **Data Subject**

The natural person to whom the Personal Data refers.

# **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

# **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

# This Website (or this Application)

The means by which the Personal Data of the User is collected and processed.

#### Service

The service provided by this Website as described in the relative terms (if available) and on this site/application.

# **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

# Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

# **Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

# **Legal information**

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to this Website, if not stated otherwise within this document.

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