



# Privacy Policy

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Department of Quality Assurance and Institutional Development





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Vertex International University ("the University," "we," or "us") places the highest priority on protecting the privacy of individuals. This Privacy Policy outlines how we collect, use, and safeguard personal data related to individuals who interact with our digital platforms and educational services.

"Personal Information" or "Personal Data" refers to any information that identifies, relates to, or can be reasonably linked, directly or indirectly, to an individual. This may include—but is not limited to—name, email address, government-issued identification number, or IP address.

The University recognizes that certain local and international data protection laws (such as the General Data Protection Regulation (GDPR) or applicable U.S. state privacy laws) provide users with specific rights. These rights will be respected in accordance with all applicable legal requirements.

By accessing the University's website or using any of its digital services, you consent to the collection and use of your personal data in accordance with this Privacy Policy.

### 1. Scope of the Privacy Policy

This Privacy Policy applies to all Personal Information collected through the official website of Vertex International University, its affiliated applications, internet services (such as Wi-Fi access points), and any other digital or interactive services provided by the University (collectively referred to as "Services").

It also applies to Personal Information collected from a variety of individuals who engage with the University, whether online, via phone, or through offline interactions, including:

- Current students
- Prospective applicants
- Alumni
- Learners participating in training programs
- Website and platform visitors
- Partners and representatives of external organizations

If you are an employee, contractor, or job applicant, this Privacy Policy applies to you only when you are using the University's Services outside your official role. Information collected in the context of employment or job applications is governed by separate employee or applicant privacy policies.



Some Services offered through the University's platforms may be subject to additional privacy policies or terms of use—such as biometric data policies or specific service agreements. In the event of a conflict between this Privacy Policy and an additional service-specific policy, the latter shall prevail.

## Student Educational Records

If you become an enrolled student at Vertex University, your educational records will be subject to applicable laws and institutional policies, including:

- The U.S. Family Educational Rights and Privacy Act (FERPA)
- Any applicable local regulations
- The University's internal academic policies

In cases where this Privacy Policy conflicts with FERPA or other applicable student rights laws, FERPA and those governing laws shall take precedence. Students have the right to limit access to their educational records and may request copies in accordance with the University's FERPA policy.

## 2. Definitions

For the purposes of this Privacy Policy, the following terms shall have the meanings set forth below:

- **Account:** A unique account created for a user to access the University's digital services or any of its components.
- **University / We / Us:** Refers to Vertex International University, the entity that owns and operates the platforms and services described herein.
- **Cookies:** Small files stored on your device through the website, containing information such as browsing preferences and usage history to enhance your experience.
- **Country:** Refers to the jurisdiction in which the University is legally registered, currently the United States - State of California.
- **Device:** Any technological equipment used to access the University's services, such as a computer, smartphone, tablet, or similar device.
- **Personal Data:** Any information that relates to an identified or identifiable natural person, including but not limited to name, email address, government-issued ID, or IP address.
- **Anonymized Data:** Data that has been stripped of identifiers or otherwise processed to prevent association with any specific individual.
- **Service Providers:** Third parties contracted by the University to perform services on its behalf, such as technical support, data analytics, systems management, and related functions.
- **Usage Data:** Information collected automatically as a result of using the services, including browsing times, pages visited, browser type, and similar technical data.



- **Service:** The University's official website, its e-learning platforms, and associated applications and systems.
- **Third-party Social Media Services:** Platforms such as LinkedIn, Facebook, Google, and others through which users may log in or share content related to the University's services.
- **Social Network Content (SNC):** Content created and shared by the user through social media platforms with consent, including images, videos, and personal data.
- **You:** Any individual accessing or using the University's services, including but not limited to students, staff, visitors, or representatives of third-party entities.

### 3. Collection of Personal Information

Vertex International University collects Personal Information from individuals through various sources, as outlined below:

#### 3.1 Information Collected Directly

We collect Personal Information that you voluntarily provide to us, whether online or offline. This may occur, for example, when you:

- Complete an application for admission
- Enroll in courses or academic programs
- Apply for scholarships or financial aid
- Interact with University advertisements or platforms
- Use our services or apps (e.g., career assessment tools, learning platforms, or student resources)
- Contact us via email, SMS, or chat features
- Participate in surveys or contests
- Create a user profile on the University's platforms or affiliated academic social networks

The types of Personal Information collected in these cases may include: name, contact information, date of birth, educational background, government-issued identification, financial information, employment status, profile photos, interests, demographic data, and more.

#### 3.2 Information Collected Automatically

The University's Services may use cookies, pixel tags, server logs, and analytics tools to automatically collect usage-related information, including but not limited to:

- Device type, operating system, IP address, browser type
- Language, approximate geographic location, connection speed



- Pages visited, access times and durations, user interaction
- Email engagement activities (e.g., link clicks)
- Recorded conversations from chat sessions
- Telephone calls, which may be recorded for training and quality assurance

purposes

This automatically collected information may be linked to other Personal Information to support the purposes described in this Privacy Policy.

### 3.3 Information Collected from External Sources

We may also obtain your Personal Information from third-party sources, including:

- Education Partners
- External service providers
- Previous academic institutions
- Government agencies (e.g., for grants and funding)
- Employers or training institutions
- Online platforms integrated with our Services

### 3.4 Categories of Personal Information We May Collect

Depending on your interaction with the University, the types of Personal Information we may collect include:

- **Identity and Contact Information:** full name, email address, phone number, mailing address, account ID, signature, etc.
- **Financial Data:** bank account information, tuition payment records
- **Educational Data:** qualifications, grades, transcripts, attendance, awards, submitted coursework, online contributions
- **Demographic Data:** age, gender, nationality, religion, marital status, ethnic background
- **Government Identifiers:** passport number, national ID, driver's license
- **Digital Behavior:** browsing history, search history, interaction with website content or advertisements
- **Audio-Visual Data:** photographs, voice or video recordings, chat transcripts
- **Health or Disability Data:** when submitted in support of specific requests or to meet regulatory requirements
- **Employment History:** previous job titles, professional experience
- **Inferred Profiles:** behavioral or educational profiles generated through data analysis



## 4. Use of Personal Information

Vertex International University may use the Personal Information it collects about you for the following purposes:

### 4.1 Admissions, Enrollment, and Financial Services Management

- Processing applications for admission and enrollment
- Verifying submitted information and evaluating eligibility
- Registering students in selected academic programs
- Managing tuition payments, scholarships, and financial aid requests
- Maintaining academic and administrative records
- Communicating with you regarding your student status at the University

### 4.2 Delivery of Academic Support and Services

- Providing access to digital platforms and University services
- Responding to inquiries and providing technical assistance
- Fulfilling service requests and processing payments
- Enabling interaction and collaboration within the University community, including through Education Partners and Service Providers
- Using live chat or AI-powered chatbots to communicate with you; any information submitted via chat may be used to personalize interactions and improve the service

### 4.3 Marketing and Promotional Purposes

- Marketing and promoting the University's current and future services
- Sending newsletters, offers, or other content that may be of interest
- Managing advertising campaigns, contests, and promotional initiatives

### 4.4 Content Personalization and User Experience

- Customizing content based on your geographic location or interests
- Displaying personalized instructions or support
- Delivering more relevant advertisements and analyzing ad campaign performance

### 4.5 Analysis, Development, and Improvement

- Understanding user behavior and analyzing service usage
- Enhancing educational platforms and developing additional programs or services
- Supporting student retention efforts and improving digital services and experiences



#### 4.6 Protection of Rights and Systems

- Securing University digital assets and network infrastructure
- Detecting and investigating fraud, unauthorized access, or misuse
- Responding to incidents of academic dishonesty or policy violations
- Taking necessary actions to address safety risks or compliance breaches

#### 4.7 Legal Compliance

- Complying with court orders or regulatory requirements
- Cooperating with law enforcement or national security authorities as required by applicable law

#### 4.8 Administrative and Operational Support

- Managing accounting, billing, and recordkeeping
- Analyzing operational performance and risk management
- Maintaining business and educational records

#### 4.9 Artificial Intelligence

The University and its Service Providers may use artificial intelligence (AI) technologies to support any of the above purposes, including personalized experiences, data analytics, and automated support.

#### 4.10 Anonymized Information

The University may de-identify Personal Information to create anonymized data sets that are used for:

- Analytical reporting
- Service and program improvement
- Benchmarking reports
- Scientific research and development purposes

### 5. Disclosure of Personal Information

Vertex International University may disclose the Personal Information we collect to third parties under the following circumstances:



## 5.1 Service Providers

We may share your Personal Information with third-party service providers contracted to perform services on behalf of the University. These providers may include:

- Electronic payment processors
- Identity or bank account verification providers
- Software and artificial intelligence developers
- Digital content providers
- Hosting and technical support providers
- Debt collection agencies
- Legal, financial, or compliance advisors and auditors
- Advertising and marketing partners
- Customer service and technical support agents

Some of these providers may use artificial intelligence technologies in delivering services on our behalf.

## 5.2 Education Partners

We may share your Personal Information with our Education Partners with whom we collaborate to offer joint academic programs, courses, professional initiatives, or who conduct academic or institutional research related to digital education.

## 5.3 Legal Compliance

The University may disclose your Personal Information as required by law, including in response to:

- Subpoenas
- Court orders
- Official requests from regulatory or law enforcement authorities

## 5.4 FERPA Compliance

We may also disclose educational records and related information in accordance with the Family Educational Rights and Privacy Act (FERPA), and in compliance with the University's internal FERPA-related policies.

## 5.5 Protection of Rights and Interests

We may disclose your Personal Information where we believe it is necessary to:





- Respond to legal claims or disputes
- Enforce our Terms of Use or contractual agreements
- Prevent or investigate fraud, misuse, or threats
- Protect the rights, interests, and safety of the University, students, partners, or other stakeholders

## 6. International Data Transfers

Due to the global nature of Vertex International University as a digital institution, your Personal Information may be processed in multiple locations worldwide, including within or outside the United States, either by the University itself or by its trusted partners and service providers.

This means that your data may be transferred to, processed, or stored on systems located outside of your geographic region or country of residence, where data protection laws may differ from those in your jurisdiction.

By using the University's services and submitting your Personal Information, you acknowledge and consent to the transfer of such data to these international locations.

The University is committed to taking all reasonable measures to ensure that your data is handled securely and in accordance with this Privacy Policy. No transfer of your Personal Information will occur unless appropriate safeguards are in place, including technical and organizational measures designed to protect your data.

## 7. Cookies and Similar Technologies

Vertex International University uses cookies and other tracking technologies such as pixel tags, tags, local storage objects (LSOs), and web beacons for the following purposes:

- Enabling technical functionalities of the website and learning platforms
- Enhancing security and detecting fraudulent activities
- Collecting information about the use of our website and services
- Personalizing advertising content and user experience
- Analyzing user behavior and improving performance and service delivery

### 7.1 Cookies

Cookies are small text files stored on your device via your web browser. They are used to record information such as:

- User preferences (e.g., language settings)



- Login sessions
- Pages visited on the website
- Interactions with email messages or on-site content

There are different types of cookies, including:

- **Session Cookies:** These are deleted automatically when you close your browser
- **Persistent Cookies:** These remain on your device until you delete them manually

You may configure your browser settings to refuse cookies or to alert you when cookies are being sent. However, disabling cookies may impact the functionality of some parts of the website.

## 7.2 Pixel Tags and Web Beacons

Pixel tags and web beacons are tiny, invisible graphic elements embedded in webpages or emails. They are used to:

- Track the number of users visiting specific pages
- Monitor engagement with emails
- Optimize and personalize advertising content
- Analyze the effectiveness of digital marketing campaigns

## 7.3 Local Storage Objects (LSOs)

Our services may use LSOs (such as Flash cookies or HTML5 storage) to store user preferences or browsing settings locally on your device.

You can manage LSOs through your device's system or browser settings, or by using Flash Player management tools available from Adobe.

## 7.4 Do-Not-Track (DNT) Signals

Some web browsers offer a "Do-Not-Track" (DNT) feature, which signals your preference not to be tracked online.

Our systems may not respond to all DNT signals, but we strive to honor privacy-related settings such as **Global Privacy Control (GPC)** wherever feasible. You may also manage certain tracking settings through our on-site **Privacy Preference Center**.



## 8. Interest-Based Advertising

Vertex International University may collaborate with third-party service providers (such as Google, Facebook, LinkedIn, and Adobe) to display advertisements on the University's platforms or to manage advertising campaigns across other websites.

These networks and platforms use tracking tools such as cookies, pixel tags, and device identifiers to collect information about your online activity over time—both on University platforms and across unrelated websites.

Based on this information, you may be presented with targeted advertisements that reflect your interests and browsing behavior, even if such ads are not visibly displayed at the time of data collection.

Device-specific data—particularly in the context of mobile advertising—may also be used to help deliver advertisements and measure the performance of marketing campaigns.

You may manage your preferences related to tracking tools and interest-based advertising through the University's **Privacy Preference Center**.

## 9. Individual Rights and Choices

This section outlines the rights you have and the choices you can make regarding our use and disclosure of your Personal Information.

### 9.1 Marketing Communications

You may choose to opt out of receiving marketing communications from the University through any of the following methods:

- Clicking the "Unsubscribe" link located at the bottom of any marketing email
- Informing a University representative during a phone call that you wish to opt out

**Note:** Opting out will remove you only from the University's marketing list and will not affect third-party mailing lists that are managed independently.

If you do not wish to receive SMS (text) messages, you can unsubscribe by replying with the word **"STOP"** to any future message. For assistance, reply with **"HELP"**, or contact us at: [TextSupport@vertexuniversity.edu.eu](mailto:TextSupport@vertexuniversity.edu.eu)



## 9.2 Social Networking Content

You may adjust the settings related to sharing your Personal Information in your user profile on University-affiliated social platforms. These changes are subject to any contractual, academic, legal, or technical restrictions and will take effect following reasonable notice.

Please note that withdrawing from social network activities may affect your access to certain University services or features.

## 9.3 Cookies and Similar Technologies

You may manage your preferences for third-party cookies and tracking technologies through our **Privacy Preference Center**, except for those cookies classified as “essential” for the proper functioning of our website.

You may also disable cookies directly via your browser settings. However, doing so may impact the availability or functionality of certain features on the University’s website.

## 10. Children’s Privacy

Vertex International University does not knowingly collect Personal Information from children under the age of 16.

If we become aware that we have collected or received Personal Information from a child in circumstances where parental consent is required under applicable law, we will promptly delete that information.

If you believe we may have collected information from a child under the age of 16 without the required parental consent, please contact us using one of the methods listed in the “Contact Us” section below.

## 11. Security Measures

Vertex International University implements a range of security measures designed to protect Personal Information from loss, misuse, and unauthorized access, alteration, or disclosure.

While we adhere to high security standards—including encryption, authentication protocols, and access control policies—no method of data transmission over the Internet is entirely secure or error-free.



As such, you share your Personal Information at your own risk and are responsible for safeguarding it when communicating through unencrypted email, social media platforms, or public channels.

We strongly recommend that you follow best practices for personal information protection and avoid transmitting sensitive data through unsecured methods.

## 12. Monitoring of Communications

Vertex International University may monitor, record, and retain all incoming and outgoing communications for the following purposes:

- Training University staff and support representatives
- Ensuring the quality of services
- Complying with the University's records retention policies
- Fulfilling legal and regulatory obligations

This includes communications conducted through the University's online chat functionality available on its website and applications.

Where such data is retained, it is maintained in accordance with the University's approved records retention policy.

## 13. Third-Party Websites and Links

Some of our Services may contain links to websites or services operated by third parties, whether independently or on behalf of multiple entities.

We encourage you to carefully review the privacy policies of any third-party websites or services you visit, as each may have its own practices and terms for handling Personal Information.

Vertex International University is not responsible for the privacy practices, content, or policies of any websites or services that are not directly operated by the University.

Your use of such third-party websites and any collection, use, or disclosure of your Personal Information on those platforms is subject to the respective third parties' privacy policies.

## 14. Changes to the Privacy Policy

Vertex International University may update or revise this Privacy Policy from time to time.



Your continued use of our services or provision of Personal Information after any such changes constitutes your acceptance of the revised policy.

In the event of any material changes to this Privacy Policy, we will make reasonable efforts to notify you in advance through one or more of the following methods:

- Posting a prominent notice on the University's website
- Sending a direct notification via email (where applicable)

## 15. Contact Us

If you have any questions or concerns regarding Vertex International University's privacy practices or this Privacy Policy, please contact us through our official **Contact Center**.

We are committed to responding promptly and addressing your inquiries in accordance with applicable privacy regulations.