

# SOUTHWESTERN

## LAW SCHOOL Los Angeles, CA

### Online Privacy Policy

**Administrative policy approved April 2019.**

**Revision history:** Technical revisions made in December 2025; substantive updates made in April 2026; technical edits made in September 2026.

**Related policies:** Privacy and Information Security Laws and Regulations Policy; Website and Digital Accessibility Policy; Acceptable Use Policy; Student Records—FERPA

**Scheduled Review Date:** May 2027 (Communications & Marketing and Information Technology)

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## **A. Policy Statement**

This policy describes how Southwestern Law School (“Southwestern” or “the law school”) collects, uses, and protects the information obtained through its websites (www.swlaw.edu and www.swlaw.edu/selfservice) (collectively, “Site”), and the choices available to users regarding how Southwestern uses the information a user provides. Southwestern follows applicable privacy laws in collecting, using, and safeguarding personal information.

Southwestern provides the Site as a service to its students, alumni, faculty, staff, admissions and job applicants, visitors, and other individuals with an interest in the law school. Nothing in this policy constitutes an inducement, promise, or contract of any kind. Southwestern is committed to respecting personal privacy and has implemented practices designed to safeguard personal information.

Southwestern’s official contact information appears at the end of this policy.

This policy does not apply to information collected from or about current or former employees, contractors, volunteers, and other Southwestern workers in the context of their employment or working relationship with Southwestern.

Southwestern complies with the Family Educational Rights and Privacy Act (FERPA) regarding student education records. FERPA permits Southwestern to disclose certain “directory information” at its discretion, consistent with published policies. Submitting personal information through the Site does not, by itself, authorize the release of education records; such records are handled in accordance with [Southwestern’s Student Records Policy – FERPA](#), available on Southwestern’s Institutional Policies webpage.

## **B. Information Southwestern Collects**

The information Southwestern collects and processes depends on the user’s relationship with Southwestern and the nature of their interaction or transaction with us. Southwestern collects the following categories of information:

**1. Contact information**

Includes user's name, mailing address, telephone number, mobile phone number, and email address.

**2. Financial information**

Includes information collected when required for specific transactions or legal obligations, such as processing financial aid or donations. This information may include Social Security numbers, passport or other government-issued identification numbers, financial aid or scholarship application information, payment history, donation amounts, and tax-related records.

Important note: Southwestern does not store full credit card numbers or bank account credentials on its servers. Payment card and banking information is processed through secure third-party payment platforms (e.g., GiveCampus, PayPal, ACI, GoMerchant, or Venmo), which are subject to their own privacy and security practices.

**3. Academic and enrollment information**

Includes educational history, transcripts, reference letters, areas of academic interest, admissions date, graduation date, student identification number, and enrollment or alumni status.

**4. Health information**

In limited circumstances, such as disability or accommodation requests, Southwestern collects health-related information that a user provides voluntarily (e.g., medical documentation or accommodation needs). This information is collected and maintained through secure systems and handled in accordance with applicable laws.

**5. Demographic and identification information**

Includes age, birthdate, marital status, gender or gender identity, race or ethnicity, income range, citizenship or immigration status, passport data or images, and visa or immigration documentation, primarily where required for federal financial aid or other legally mandated processes.

**6. Profile and account information**

Includes usernames, passwords, user or constituent identifiers, institutional IDs, user's relationship to Southwestern (e.g., applicant, student, faculty,

staff, alumni, donor), and preferences or inferred interests used to personalize communications or content.

## **7. Technical information**

Information collected automatically when a user visits the Site, such as:

- device type and unique device identifier
- Internet Protocol (IP) address
- browser type and version, operating system, and time zone setting
- login information and browser plug-in details
- mobile network information and platform

## **8. Site usage information**

Includes information about how a user interacts with the Site and digital communications, such as pages visited, links clicked, time spent on pages, interactions with content or advertisements, and related analytics data used to improve our services and communications.

# **C. How Southwestern Uses Provided Information**

## **1. Personally identifiable information (PII) or personal information**

Personally Identifiable Information or personal information is any recorded information about a user from which the user can be identified. If a user is located in the European Economic Area ("EEA"), "PII" or "personal information" includes "personal data," as defined under applicable European data protection laws, including the General Data Protection Regulation. This definition also includes special categories of personal data (sometimes referred to as sensitive personal information), which are subject to heightened protections under those laws.

Personal information allows Southwestern to provide users with products, services, and information, and enables the law school to offer a customized experience on the Site. Southwestern uses personal information for the purposes described in this policy or otherwise disclosed on the Site.

Southwestern processes personal information for purposes arising from a user's activities on the Site. Southwestern will use personal information only for the purposes for which it was collected, unless Southwestern reasonably determines that the law school needs to use it for another

related reason and that reason is compatible with the original purpose. If Southwestern needs to use personal information for a purpose unrelated to the original purpose, Southwestern will seek the user's consent to use it for that new purpose.

Southwestern uses personal information and other information it collects about users, whether provided directly by a user or collected through third-party vendors, for the following purposes, which reflect the law school's primary uses of information. Southwestern uses personal information only for purposes that are consistent with these activities and in accordance with applicable law.

- To provide and administer programs and services:
  - Process applications, registrations, and enrollments for our programs, services, or events;
  - Manage a user's participation in Southwestern activities such as classes, financial aid, housing, or other events; and
  - Administer requests from users (e.g., preparing identification cards or parking permits).
- To communicate with users:
  - Provide information users' request and respond to users' questions, comments, or complaints;
  - Send administrative and operational messages (e.g., confirmations, security alerts, policy updates, or event notices);
  - Share Southwestern news, announcements, and opportunities that may be of interest to users, including through personalized communications and outreach based on users' interactions with us, consistent with applicable laws and users' communication preferences; and
  - Engage with and coordinate activities involving volunteers and supporters.
- To support advancement and engagement:
  - Collect and process donations, gifts, and donor information;
  - Manage alumni and donor relations, stewardship activities, and event participation; and
  - Conduct research and analysis to better understand alumni and donor interests and engagement, including wealth screening and donor prospect research conducted in accordance with applicable laws.
- To operate and improve our website and digital services:

- Maintain, operate, and enhance the functionality, performance, and security of our website and online systems;
  - Monitor usage trends and user experience to improve site content and accessibility; and
  - Review and correct personal information for accuracy, completeness, and integrity.
- To protect legal and institutional interests:
  - Prevent, detect, and investigate potential fraud, abuse, or illegal activities;
  - Comply with applicable legal obligations, policies, and reporting requirements; and
  - Help maintain the safety and security of our campus community and digital systems, including sending emergency notifications and security-related communications.
- To enable optional and consent-based features:
  - Allow users to participate in interactive features on the Site; and
  - Carry out any other purpose described at the time a user's information is collected, with the user's explicit consent when required.

Southwestern shares personal information with trusted third-party service providers that perform services for Southwestern. These providers help the law school operate the Site, process payments and donations, manage event registrations, send email communications, maintain customer and alumni records, support accessibility accommodations, print and mail materials, and analyze website performance. These service providers are authorized to use personal information only as necessary to perform services on the law school's behalf. Where a user's personal information is shared with third parties, Southwestern will seek to share the minimum amount necessary. For more information on third-party service providers, see the section below titled Third-Party Tracking Technologies (Analytics, Advertising, and Integrations).

Southwestern uses third-party email services (e.g., MailChimp) to send promotional materials and emails about recruitment and enrollment, upcoming programs, and events; a user may opt out at any time by clicking the unsubscribe link on any email the user receives from us or by emailing the law school at [co-mark@swlaw.edu](mailto:co-mark@swlaw.edu).

Southwestern also uses social media platforms (e.g., Facebook, YouTube, LinkedIn, and Instagram) to deliver and measure advertising about recruitment and enrollment, upcoming programs, and events; a user can manage certain advertising preferences through the settings provided by those platforms and, where available, the law school's cookie controls.

For more information on third-party service providers, see the section below titled Third-Party Tracking Technologies (Analytics, Advertising, and Integrations).

All Southwestern's third-party service providers are required to take appropriate security measures to protect users' personal information in line with our policies.

Southwestern may also share a user's personal information with a government authority that requests the information or with third parties if the law school is under a duty to disclose or share the user's personal information in order to comply with laws, regulations, or any legal obligation, or in order to enforce or apply the Site terms of use or to protect the rights, property or safety of the Site, our users, and others.

Personal information is shared within Southwestern among authorized departments, personnel, and institutional systems as necessary to support the activities described above.

We may input your personal information into generative artificial intelligence systems for business purposes. As with other third-party vendors and service providers, we will endeavor to ensure that any generative artificial intelligence system that we use affords adequate privacy protections in accordance with this policy.

Southwestern may use aggregated or de-identified demographic information for institutional research, planning, reporting, benchmarking, and participation in educational surveys or similar initiatives. This information does not identify individual users.

Southwestern does not sell or rent users' personal information to third parties for their own commercial uses.

## **2. Non-PII**

Southwestern automatically receives and retains certain types of information whenever a user interacts with the Site. This information may be used to monitor Site traffic, assist with navigation, generate statistics,

measure Site activity, improve the usefulness of the Site, or deliver customized online advertising relating to upcoming programs.

Non-Personally Identifiable Information includes, but is not limited to:

- Requested URL (Uniform Resource Locator);
- IP (Internet Protocol) address (this may or may not identify a specific computer);
- Domain name from which a user accesses the internet;
- Referring URL;
- Software (browser/operating system) used to access the page; and
- Date and time pages were visited.

## **D. Changing User Information**

Users can correct and revise their personal information collected by Southwestern by logging into their profile on the Site or by emailing [privacy@swlaw.edu](mailto:privacy@swlaw.edu) for assistance. For any other inquiries or requests regarding a user's personal information, the user may email us at [privacy@swlaw.edu](mailto:privacy@swlaw.edu).

Southwestern will consider and respond to all privacy-related requests in accordance with applicable law and school policies. While certain deletion or access rights may apply only to users in specific jurisdictions (e.g., the General Data Protection Regulation in the EEA), Southwestern values the privacy of all the law school's website visitors and will attempt to accommodate requests where feasible.

Depending on the circumstances and the nature of a user's request, it may not be possible for us to fulfill the user's request. For example, where it is a statutory or contractual requirement for Southwestern to process a user's personal information, it would not be possible for us to fulfill our legal obligations if Southwestern were to stop.

Southwestern will respond to a user's request without undue delay and, in any event, in accordance with applicable law. Please note that Southwestern may keep a record of a user's communications to assist the law school in resolving any issues a user raises.

## **E. Retaining User Information**

Southwestern retains different categories of personal information for different periods, depending on the purpose for which they were collected and in accordance with any legal or institutional requirements. For instance, alumni records may be kept indefinitely for alumni relations purposes unless deletion is

requested, whereas web server logs may be kept only for a few months. When personal information is no longer needed, Southwestern will ensure it is securely deleted or anonymized. See Southwestern's [Record Retention and Disposal Policy](#), available on Southwestern's Institutional Policies webpage.

## **F. International Transfer of User Information**

If a user located outside the United States provides us with their personal information, it may be transferred to other countries, such as the United States, where data protection laws may differ from those in the user's home country. By providing Southwestern with information, a user acknowledges that it may be transferred to and processed on servers located in the United States. However, Southwestern will take reasonable steps to protect user privacy in accordance with the applicable data protection laws.

## **G. Cookies**

Southwestern uses "cookies" (small files placed on a user's computer) that enable the law school to recognize a user's browser to capture and remember certain information. For example, Southwestern uses cookies to identify a user and maintain the user's signed-in status, which helps the law school remember and process the courses in the user's shopping cart. Southwestern also uses cookies to identify a user's preferences based on previous and current Site activity, and to help the law school aggregate Site traffic and behavioral data.

When a user first visits the Site, the user will see a banner notifying the user of the law school's use of cookies on the Site. A user can choose to accept or decline non-essential cookies at any time by adjusting their browser settings.

Cookies are required to use certain features on the Site. A user can decline cookies if their browser permits, although doing so may interfere with their use of the Site. Some cookies are "session cookies," meaning that they are automatically deleted from the user's hard drive at the end of a session, such as when the user's browser is closed. The user's web browser may allow the user to select a "Do Not Track" setting, which sends a signal to websites that the user does not want information about their internet activity to be collected or tracked. Like many websites, the Site does not respond to internet browser "Do Not Track" signals.

Cookies may be set by an organization other than Southwestern. These "third-party cookies" may, for example, originate from websites such as, but not limited to, YouTube, X, Facebook, Instagram, or other social media services for which the law school has implemented plug-ins. Since the cookie policies of these sites

change over time, users should determine their policies by visiting their privacy policy pages directly.

## **H. Third-Party Tracking Technologies (Analytics, Advertising, and Integrations)**

Southwestern employs web analytics technology that helps the law school better manage content on the Site. This technology can track user behaviors and activities on the Site.

### **1. Social media integration**

The Site may enable a user to connect or share information through social media platforms, such as Facebook, LinkedIn, X, or similar platforms. If a user chooses to interact with the Site through a social media platform, Southwestern does not receive the user's social media login credentials; however, Southwestern may receive certain public profile information (such as a profile name) from the social media platform in accordance with the platform's data-sharing permissions and the user's settings.

Information collected by Facebook or other social media platforms through these integrations (for example, indicating that a user visited the Site or used a plugin) is governed by the respective platform's privacy policies. Users are encouraged to review those privacy policies and settings before using these features. Southwestern uses information received from social media platforms in accordance with this policy.

### **2. Siteimprove (analytics and accessibility)**

Southwestern uses certain third-party analytics and site improvement tools, such as Siteimprove, to help the law school understand how the Site is used and to maintain the quality and accessibility of the Site.

Siteimprove may use cookies and scripts to process visitor IP address and non-personally identifiable information about a user's visit (for example, which pages the user visits, click patterns, and technical information about a user's browser or device). This data helps Southwestern identify broken links, improve content, and ensure the Site meets accessibility standards. The information gathered through Siteimprove is used for the law school's internal website management purposes only and is not used by Siteimprove for any commercial purpose beyond providing these services to Southwestern. For more details on Siteimprove's privacy practices, users can refer to Siteimprove's privacy policy. By using the Site, users acknowledge the analytics data processing as described.

### **3. Google Tag Manager and Google Analytics**

The Site uses Google Analytics, implemented via Google Tag Manager, to collect information about how visitors use the Site. Google Analytics uses cookies and similar identifiers to gather data such as a user's IP address, browser type, the pages a user visits on the Site, and the time spent on each page. Southwestern uses these insights to analyze Site traffic and usage patterns, which helps the law school improve content and user experience. The information collected by Google Analytics is aggregated and does not directly identify a user to Southwestern. Google may also use the collected data for its own analytics purposes. If a user wishes to opt out of Google Analytics tracking, Google provides a Browser Add-on that a user can install (see Google's site for the opt-out tool). Please note that Southwestern's use of Google Tag Manager is solely to manage these analytics and other functional scripts on the Site; the Tag Manager itself does not collect personal information, but it facilitates the loading of other tags as described here. By continuing to use the Site, the user consents to the processing of data about their visit by Google as outlined. For more details, users can review [Google's Privacy Policy](#).

### **4. Social sharing tools (AddToAny)**

The Site includes social sharing functionality provided by AddToAny, which allows users to share Southwestern's content through platforms such as Facebook, LinkedIn, X, email, and other services. When social sharing tools are displayed on a page, AddToAny and the social media platforms a user chooses to use may collect certain technical and usage information, such as user device type, browser information, IP address, and the pages a user visits on the Site. If a user chooses to share content, the social media platform may also receive information about the content the user shared and their interaction with the sharing feature. These third parties may set cookies or use similar technologies in accordance with their own privacy policies.

Southwestern does not receive personal data collected directly by AddToAny or by the social media platforms users may use to share content. Southwestern may receive aggregate information, such as the number of times content is shared, to help the law school understand engagement with the Site.

A user's interactions with social sharing tools are governed by the privacy policies of AddToAny and the social media platforms involved. Users can limit tracking by adjusting their browser settings, using available privacy controls provided by those platforms, or choosing not to use the social sharing features. For more information, users should review the [AddToAny Privacy Policy](#) and the privacy policies of any social media services they choose to use.

## **5. Intercom**

Southwestern uses Intercom to post banners on the Site. Intercom may employ cookies or local storage to track banner usage. The information collected via Intercom is used by Southwestern solely for assisting users and improving our services.

### **I. Chatbots**

Chatbots are software programs that use artificial intelligence to simulate a conversation. Chatbots may be used to provide customer service. Any personal information that a user provides in the chat is automatically collected and processed by the third-party chatbot provider and by Southwestern for the purposes described at the point of collection. Any personal information collected by the third-party chatbot provider will be handled in accordance with the third party's privacy policy, which will be available in the chat window. Do not submit sensitive personal information unless it is necessary for your request.

### **J. Data Security**

To prevent unauthorized access, maintain data accuracy, and to ensure the appropriate use of information Southwestern gathers about users, the law school has taken commercially reasonable steps to protect the integrity of the Site and the information contained within. Southwestern maintains industry-standard security controls to ensure the integrity and security of the data the law school collects.

While Southwestern takes reasonable precautions to protect user data, no security measures can be 100% secure, and Southwestern cannot guarantee the security of user data.

Users can help protect their accounts and information by:

- Protecting their login information and keeping it secure and unique.
- Creating a sufficiently complex password that would be difficult to guess.
- Avoid storing their password in a place where others can view it.

- Logging out of the Site. Not logging out could allow other individuals to inappropriately access user account and personal information.
- Avoiding posting any account information, including links, in public forums. This could include posting pictures of account information on services like Instagram, X, etc.

## **K. Disclosure**

All user information (PII and otherwise) discussed in this policy may be transferred to third parties in the event of the sale or merger of Southwestern, a transfer of its assets, or in the event of a bankruptcy.

## **L. Links**

This policy applies to the Site only. The Site may contain links to and from third-party websites that are outside of the law school's control. If a user follows a link to any of these websites, please note that these websites have their own privacy policies and that Southwestern does not accept any responsibility or liability for these policies. Southwestern is not responsible for the privacy practices of other sites and recommends users read their privacy statements before submitting any personal information.

## **M. EEA Data Subject Rights**

If a user is located in the EEA, the United Kingdom, or Switzerland, the user has certain rights with respect to personal data. These rights include the right of access, right of correction, right to be forgotten, right to restrict processing of identifiable personal information, right to notice related to changes/deletion/limits on processing, right to data portability, right to object, right not to be subject to decisions based solely on automated processing, right to withdraw consent, and right to complaint to a supervisory authority. Certain rights are subject to legal limitations or other conditions.

A user may contact Southwestern to exercise rights available under applicable law by using the contact information provided below, or by emailing [privacy@swlaw.edu](mailto:privacy@swlaw.edu). Southwestern's Chief Information Officer is Southwestern's Data Protection Officer. The Data Protection Officer can be contacted at [privacy@swlaw.edu](mailto:privacy@swlaw.edu).

As used below, "Data Subject" refers to individuals in the EEA, the United Kingdom, or Switzerland whose personal data Southwestern processes. For purposes of applicable European data protection laws, Southwestern is the "data controller" of personal information collected through the Site.

Southwestern may process a Data Subject's personal data under the following conditions:

- Consent: the Data Subject has given their consent for processing personal data for one or more specific purposes.
- Performance of contract: provision of personal data is necessary for the performance of an agreement with the Data Subject or for any pre-contractual obligations thereof.
- Legal obligations: processing personal data is necessary for compliance with a legal obligation to which Southwestern is subject.
- Vital interests: processing personal data is necessary to protect a Data Subject's vital interests or those of another natural person.
- Public interests: processing personal data is related to a task that is carried out in the public interest or in the exercise of official authority vested in Southwestern.
- Legitimate interests: processing personal data is necessary for the purposes of Southwestern's legitimate interests.

Southwestern will respond to a Data Subject's written request without unreasonable delay and in accordance with any deadlines imposed by law. Southwestern will not charge any fee in connection with the exercise of a Data Subject's rights. If a Data Subject is not satisfied with Southwestern's response, the Data Subject has the right to complain to or seek advice from a supervisory authority and bring a claim against Southwestern in any court of competent jurisdiction. As a general rule, the Data Subject can contact the Supervisory Authority of their usual place of residence, work, or place of the alleged infringement. Data Subjects can find their local Supervisory Authority here [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en). Within the United Kingdom, Data Subjects can submit complaints to the Information Commissioner's Office. Within Switzerland, Data Subjects can submit complaints to the Federal Data Protection and Information Commissioner.

## **N. California Privacy Rights**

Although the California Consumer Privacy Act (as amended by the California Privacy Rights Act) does not apply to Southwestern, the law school endeavors to uphold strong privacy principles. California residents may contact Southwestern with questions about their personal information.

## **O. Additional Notice to Nevada Residents**

Under Nevada Revised Statutes Chapter 603A (the "Nevada Privacy Act"), Nevada residents who have purchased goods or services from Southwestern may notify

the law school not to sell their covered personal information. Covered personal information includes first and last name, address, email address, phone number, and identifiers that allow a specific person to be contacted. If a user is a Nevada resident, they may submit a request to Southwestern not to sell their covered information by emailing [privacy@swlaw.edu](mailto:privacy@swlaw.edu).

## **P. Protection of Minors**

Southwestern does not knowingly collect or maintain PII through the Site from individuals under 13 years of age, and no part of the Site is intended for individuals under 13 years of age. Individuals under 13 should not use or access the Site at any time or in any manner. Southwestern will take appropriate steps to delete any PII of persons less than 13 years of age that has been collected through the Site without verified parental consent upon learning of the existence of such PII.

## **Q. Policy Revisions**

Southwestern expressly reserves the right to change or modify any aspect of this policy at any time, with or without notice. If Southwestern makes any changes to this policy, Southwestern will change the "Revision history" date above. In some cases, Southwestern may provide users with additional notice, such as adding a statement to the Site. Southwestern encourages users to review this policy whenever they access the Site to stay informed about the law school's information practices and the ways users can help protect their privacy.

## **R. Contacting Us**

If a user has questions or concerns regarding Southwestern's privacy practices or this policy, the user may contact Southwestern by email at [privacy@swlaw.edu](mailto:privacy@swlaw.edu) or at:

Southwestern Law School  
Attn: Information Technology  
3050 Wilshire Boulevard  
Los Angeles, CA 90010