

Carnegie Data Privacy Policy

1. Applicable Laws

In accordance with the Massachusetts Data Privacy Law (MIPSA) and the General Data Privacy Regulation (GDPR), Carnegie is committed to processing data in accordance with its responsibilities as defined by its obligation to “develop, implement, and maintain a comprehensive information security program,” which protects personal information.

2. General Statement

As an enrollment and marketing solutions-provider for higher education, it is vital that Carnegie defines our ethical, academic, and compliance related obligations when it comes to privacy requirements and standards over data and information that may be classified as “Personally Identifiable Information.”

This privacy declaration represents Carnegie’s commitment to respecting and protecting the privacy of its clients, partners, associates, staff, and anyone from whom Carnegie Personnel may collect or receive Personally Identifiable Information. Moreover, in accordance with the Massachusetts Data Privacy Law (MIPSA) and the General Data Privacy Regulation (GDPR), Carnegie is committed to processing data in accordance with its responsibilities as defined by its obligation to “develop, implement, and maintain a comprehensive information security program,” which protects personally identifiable information.

Carnegie is also committed to protecting the privacy of personally identifiable information within its direct and indirect control in a manner consistent with applicable laws, regulations, and company policies, procedures, and principles. Carnegie’s values of integrity, accountability and open communication direct our operational guidelines as we determine any actions relating to Personally Identifiable Information that may be collected, used, disclosed, retained, and disposed.

This policy applies to all personal data classified as “Personally Identifiable Information” that may be processed by Carnegie, and complies with the laws, regulations, and company policies, procedures, and principles, thereby demonstrating Carnegie’s commitment to maintaining a high degree of governance and accountability with managing Personally Identifiable Information that may be part of our operational stewardship.

Carnegie’s commitment to data security for Client supplied data includes assurance that all data remains under the ownership of the client and, as such, Carnegie will never share, sell, or commingle data except as contractually required to do so to fulfill the responsibilities of the contract with the Client. Carnegie commits to absolute respect of data and data security at all times.

3. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, Carnegie shall promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the Massachusetts Consumer Affairs and Business Regulation and Attorney General’s offices (further reference is available at mass.gov)