

## PRIVACY POLICY

*intoCareers*, a unit of the University of Oregon, develops and maintains the Career Information System (CIS) and CareerTrek (collectively, the “Services”) to help individuals explore education and career opportunities and create plans for their future. This Privacy Policy applies to both CIS and CareerTrek applications, which share the same data management, security, and privacy practices. Access to our Services is available through the school or organization providing you career development resources.

Privacy and security are a high priority for *intoCareers* and our applications. We work diligently to maintain our users’ privacy. Our Services adhere to guidelines created by the Children’s Online Privacy Protection Act (COPPA) and the Family Educational Rights and Privacy Act (FERPA). All personal information entered by users or provided by schools remains the property of the individual user, the school, or the organization providing career services. *intoCareers* does not claim ownership of this data. This Privacy Policy explains how we collect, use, and protect your data, and how you can exercise your privacy rights. By using our Services, you acknowledge that you have read and understood this Privacy Policy.

If you have any questions or concerns about the information in this Privacy Policy, please contact us at [cishelp@uoregon.edu](mailto:cishelp@uoregon.edu).

### Definitions

For the purpose of this Privacy Policy:

- “*intoCareers*,” “we,” “our,” or “us” refer to *intoCareers*, a unit of the University of Oregon, which develops and maintains the Career Information System (CIS) and CareerTrek.
- “Services” refers collectively to CIS and CareerTrek, including all features, content, and tools provided through these platforms.
- “User” refers to any individual who accesses or uses the Services, including students, educators, administrators, parents, or other authorized personnel.
- “School” or “Organization” refers to the educational institution or service provider that offers access to our Services.
- “Service Coordinator” refers to the individual or designee at the school or organization responsible for providing access to our Services.
- “Portfolio” refers to a user account within the Services that stores information entered or created by the user.
- “Personal Information” means any information that can reasonably be used to identify an individual, either directly or indirectly, such as name, username, email address, or other unique identifier.
- “Data” refers to any information collected, provided, or generated through the use of our Services, including personal information, user preferences, and portfolio content.

### **Special Note About Children’s Data**

*intoCareers* designs our Services in compliance with the requirements of the Children’s Online Privacy Protection Act (COPPA). Children under the age of 13 are unable to independently create their own portfolios within our Services. Schools and organizations that provide our Services to students under the age of 13 need to obtain written authorization from a parent or legal guardian before an online portfolio is created for their child. The parent or guardian must also agree to the terms of this Privacy Policy.

Parents and guardians may access their child’s portfolio, either by contacting the school’s Service Coordinator or by using the child’s username and password. At any time if a parent or guardian wishes to withdraw consent and prohibit future use of our Services, the Service Coordinator can delete the child’s portfolio.

The Family Educational Rights and Privacy Act (FERPA) protects the privacy of student education records. Sections of all student portfolios at a school are accessible to the Service Coordinator. However, under FERPA, school officials must have a “legitimate interest” to view student information. Service Coordinators and their designees may only access the notes and personal reflections stored in a portfolio if the student has opted in to sharing. Schools may set a policy that requires all students opt in rather than allowing individual choice. If a school requires all students to opt in, every student will receive a notification of this policy the first time they log in. At schools that allow individual choice whether to share their information, students can opt in or opt out of sharing at any time in their account settings.

### **Information You Provide**

To take advantage of our Services, users may need to create a personal portfolio. To create a personal portfolio, you are required to provide your first name, last name, school or organization, expected graduation year, and answers to two (2) security questions for the purpose of account recovery. You must also create a username and password or use a school-approved login method. For students under the age of 13, login credentials are provided by the school or organization rather than created by the student.

To make the most of our Services, you may choose to enter additional information in your portfolio, such as your career interests, education preferences, personal goals or notes. This information is used to personalize your experience and help you learn about future education and career opportunities.

### **Information We Collect**

We collect only the data reasonably necessary to provide and support the Services as described in this policy. Specifically, we collect the following categories of data:

- Account information (e.g., name, username, school)

- Portfolio content (e.g., assessments, reflections, notes)
- Usage and activity data (e.g., feature use, session duration)
- Device data (e.g., IP address, browser type, operating system)

In addition to information you provide, we automatically collect information about your site usage when you access our Services through the use of cookies. This information helps us maintain and improve our applications. The information we collect includes how often content is accessed, the frequency of responses to assessment questions, and the average length of user sessions. This information may be compiled in aggregate reports for the purposes of evaluating and improving our Services. Any aggregate reports shared with others cannot be used to identify individual users.

A "cookie" is a small file sent from our website that is temporarily stored on your computer or device while accessing our Services. Cookies may transmit information about your use of the site, such as Internet protocol (IP) addresses, browser type, operating system, clickstream data and timestamps. The cookie is removed when you log out of your account, close your browser, or after 24 hours of inactivity. We use cookies to ensure personal information is securely stored in the appropriate user account, assist in resolving technical issues, and better understand how users interact with our Services.

### **How We Use Information**

*intoCareers* does not sell or rent any personal information to third parties for any purpose. We do not use your personal data for targeted marketing or advertising. No advertisements are displayed while using our Services. We use the information we collect for the sole purpose of providing, evaluating, and improving our Services. Specifically, we use your information to:

- Manage and authenticate individual accounts
- Provide technical and user support
- Analyze usage trends to improve the design of our Services
- Generate de-identified or aggregate reports for research and evaluation
- Allow authorized educators and administrators to view identifiable student information for legitimate educational purposes

Schools and organizations that provide access to our Services can compile user information in the form of various usage reports. These reports are designed to help Service Coordinators evaluate user participation and engagement with our Services.

We share personal information with third parties only in the following limited circumstances:

- When required by law or regulation
- When necessary to correct issues within our Services

- When sharing de-identified or aggregate data that cannot reasonably be used to identify individual users
- When a school offers Peterson’s practice testing through our Services, in which case the minimum information necessary to enable access is shared, as described in the *Links to Other Sites* section below

### **Links to Other Sites**

Our Services may contain links to third-party websites not owned and operated by *intoCareers*. If you click on a third-party link, you will be directed to that third party’s website. External websites will open in a new browser window.

If your school offers Peterson’s practice testing through our Services, the user’s first name and a system-generated, non-functional email address are shared solely to enable access to the practice testing platform. Users may choose not to share information with this third party by refraining from accessing Peterson’s practice tests through our Services.

Third-party websites may provide services that require users to register and provide additional personal information. *intoCareers* is not responsible for the content, privacy policies, or practices of any third-party website or service. This Privacy Policy does not apply to third-party websites or services. We strongly encourage users to review the Privacy Policy of any external website they visit. Users will be notified of any material changes to the use of third parties in our Services.

### **Data Security**

*intoCareers* protects personal data using industry-accepted security measures. User accounts are protected by a password or other school-approved authentication method. Schools may choose to provide single sign-on (SSO) authentication through our Services. Users can help protect their accounts by choosing strong passwords and keeping their password confidential at all times. Our Services enforce strong password creation and employ session time-outs to improve account security.

Information entered within our Services is encrypted during transmission over the Internet using standard encryption protocols (TLS). Internal databases are password protected and segregated by firewalls. Backups are encrypted at rest. Access to personal data is restricted to authorized personnel with an educational, administrative, or technical support purpose.

While the security of your personal information is very important to us, please be aware that the Internet is not 100% secure. As such, we are unable to guarantee the absolute protection of information we collect from you. In the unlikely event *intoCareers* becomes aware of a data breach involving personal information, we will promptly notify the affected schools or organizations and take appropriate action to mitigate potential harm.

### **User Rights**

At any time, users may access, modify, or delete data saved within their portfolio through their account settings. Deleted data is permanently removed from our databases. If you would like to delete your entire portfolio, you should contact the Service Coordinator at your school or organization. For children under the age of 13, parents and guardians have the right to access their child's information and request deletion by contacting the Service Coordinator at their child's school.

### **Data Retention**

User data is retained for as long as an account remains active. Active accounts are maintained until the user or authorized school representative deletes the portfolio. When an account is deleted or remains inactive for five (5) years, the associated data is moved to a password-protected archive. Archived data is not visible within the Services but may be retained for administrative, legal, or record-keeping purposes. Upon verified request, archived data is permanently deleted.

At any time, you may request permanent deletion of all data associated with your account by contacting [cishelp@uoregon.edu](mailto:cishelp@uoregon.edu). Requests are reviewed and processed promptly. *intoCareers* will complete deletion within seven (7) days of the verified request.

### **Updates to this Privacy Policy**

We reserve the right to update this Privacy Policy at any time. We will notify our users about any material changes to this Privacy Policy by posting a notice on the Services' homepage. Your continued use of our Services constitutes your acknowledgement and acceptance of the revised policy.

Updated and effective January 8, 2026