

PRIVACY POLICY

The Pineville Beauty School will implement and maintain an Information Security Program to ensure the privacy and confidentiality of all nonpublic personal information. According to the Privacy and Access Policy and in compliance with the Gramm-Leach-Bliley Act (GLBA) and the Family Educational Rights and Privacy Act of 1974, all consumer's nonpublic personal information concerning students is private and will not be released. This information can only be released to the student, parent, guardian (if the student is still a minor) in written form to protect the rights of the student; written consent is not necessary for selected agencies, i.e., accrediting, governmental, or other agencies so authorized by law. Request to access the student's academic information may only be granted upon receiving consent from the student. In the event the student is still a minor, the student's parents or guardian shall be afforded the same rights as those of the student. The school requires written consent from the student, or guardian, for release of records in response to each third party request, unless otherwise required by law, before publishing a directory of information such as name, address and phone of student, date and place of birth, major field of study, dates of attendance, degrees and awards received, date of graduation, previous school attended, and/or date of graduation from previous school, allow the student, or guardian, to deny authority to publish one or more of these items. Pineville Beauty School guarantees the right to each student to gain access at any time to their academic and financial files. The student must contact the Administrator of the institution in order to do so by phone at (318) 445-1040 or by email at staff@pinevillebeauty.com.

Program Objectives:

The Gramm-Leach-Bliley Act (GLBA) regulates the collection, disclosure and protection of consumer's nonpublic personal information or personally identifiable information (PII) by financial institutions. It established the following information security standards for financial institutions:

The Pineville Beauty School shall establish a program standard for the institution for relating to administrative, technical and physical safeguards outlined in the Gramm-Leach-Bliley Act (GLBA). As a result, the objectives of this Program are as follows:

- Ensure the security and confidentiality of the Pineville Beauty School's students and employee's information.
- Protect against any anticipated threats or hazards to the security and integrity of such records.

Protect against unauthorized access to or use of the Pineville Beauty School's students and employee's information that could result in substantial harm or inconvenience to any customer.

Defining Language:

For purposes of the Pineville Beauty School's Program, the following terms shall be defined as follows:

Student Information: Any information about a Student's (as well as parents') and/or employee's, or information the institution receives about the student of another financial institution, that can be directly or indirectly attributed to the student. Student information shall be split into:

- **Personally Identifiable Information (PII):** All personal information associated with an individual and includes everything from their name to their Social Security Number.
- **Sensitive PII:** Requires more protection because its improper release could result in harm, embarrassment, inconvenience, or unfairness to the individual whose name or identity is linked to the information. Combining pieces of non-sensitive information could result in a set of information that is sensitive.

Collection of Personally Identifiable Information (PII)

The Pineville Beauty School will collect Personally Identifiable Information (PII) in the following ways:

- Application for Admissions.
- Information required to process and award forms of Financial Programs such as Federal Financial Aid, Louisiana Rehabilitation Services (LRS), TOPS (Taylor Opportunity Program for Students), and VA (Veteran's Benefits) / GI Bill.
- Information required by the Pineville Beauty School's third-party servicer, FAME, to process Federal Financial Aid.
- Application for the Louisiana Board of Cosmetology.
- Information required by the Pineville Beauty School's accrediting Agency, NACCAS (National Accrediting Commission of Career Arts & Science, Inc).

Nonpublic personal information collected by the Pineville Beauty School may include a student's name, address, Social Security number, and financial information. In any case where the student is a minor and/or dependent, nonpublic personal information, as mentioned above, may also be collected from the student's parent(s) and/or guardian(s). Parent(s) and/or guardian(s) will be afforded the same rights and privacy as the student under this policy.

Disclosure of Nonpublic Personal Information

We will not share, sell or otherwise provide nonpublic personal information to any third parties without your written consent, with the exceptions of formal requests by courts of law, law enforcement agencies, and third parties "as permitted by law" to support our school in providing products and services to our students. Third parties may include the Louisiana Board of

Cosmetology, NACCAS, Federal Financial Aid Department, U.S. Department of Education, Louisiana Office of Student Financial Assistance, Louisiana Rehabilitation Services and/or Louisiana Workforce Commission, the Department of Veteran's Affairs, and Deborah John & Associates Financial Aid Services, Inc.

All other information will only be released to the student, parent(s), and/or guardian(s) in written form to protect the rights of the student, parent(s), and/or guardian(s). Written consent by the student, if not a minor, will be required to release any information to the parent(s) and/or guardian(s) of said student. Written consent will not be necessary for selected agencies as listed above and "permitted by law".

Security of Nonpublic Personal Information

It is the goal of the Pineville Beauty School to ensure the safety and confidentiality of all records containing nonpublic personal information in compliance with all federal, state, accrediting agency, and legal requirements. This includes any information, whether in paper, electric, or other form, that is handled and maintained by the institution. This includes any information obtained from a student, parent(s), guardian(s), and/or third parties. The Pineville Beauty School shall:

All records containing customer information shall be stored and maintained in a secure area.

- Paper records shall be stored in a room, cabinet, or other container that is locked when unattended. The institution's owners and Program Coordinator shall control access to such areas. Areas containing records are secured at all times and only approved personnel may access.
- All storage areas shall be protected against destruction or potential damage from physical hazards, like fire or floods.
- Electronic customer information shall be stored on secure computers and regularly assessed and updated to ensure security. Access to such information shall be password controlled, and the Program Coordinator shall control access to such computers.
- Student information consisting of financial or other similar information (e.g., social security numbers, etc.) shall not be stored on any computer system with a direct Internet connection.

All electronic transmissions of student and employee information, whether inbound or outbound, shall be performed on a secure basis.

- The Pineville Beauty School will accept Social Security, IRS information, or other sensitive financial data directly from students by only by hard copy. Students (as well as parents) are advised against transmitting PII via electronic mail.
- The Pineville Beauty School shall require by contract that inbound transmissions of student information delivered to the Institution via other sources be encrypted or otherwise secured. The Pineville Beauty School rejects any information received in the incorrect form.
- All outbound transmissions of student information shall be secured. The Pineville Beauty School only transmits student information through secure portals.
- To the extent sensitive data must be transmitted to the Institution by electronic mail, such transmissions shall be password controlled or otherwise protected from theft or

- unauthorized access.
- Oversee third-party providers to ensure they maintain safeguards to protect nonpublic personal information.

All paper transmissions of customer information by the Pineville Beauty School shall be performed on a secure basis.

- Student Information shall be properly secured at all times. The institution's owners and Program Coordinator shall control access to such areas. Areas containing records are secured at all times and only approved personnel may access.
- Student information delivered by the Institution to third parties shall be kept sealed at all times and sent via a carrier that allows a confirmation receipt.
- Paper-based student information shall not be left unattended at any time it is in an unsecured area. Employees shall abide by a "Clean Desk Policy" ensuring their computer is locked and items with PII are securely contained when unattended.

All student information shall be disposed of in a secure manner according to regulations and its retention period.

Website Privacy Disclosure

The Pineville Beauty School encourages feedback. We reserve the right to use comments provides to the school for use on its website, in marketing materials, advertising, and promotions. When using any feedback, the Pineville Beauty School will not use an individual's full name or disclose other nonpublic personal information. Any information obtained through the Pineville Beauty School's website on their contact page will be kept secure. Our website does not download tracking cookies to your computer. The Pineville Beauty School's website does contain links to third party sites to assist the student and comply with certain federal, state, and accrediting agency regulations. The school is not responsible for the privacy and/or security of other websites.

We appreciate your trust in our commitment to protecting your privacy. If you have any questions regarding this policy, please e-mail our Administrative Office at staff@pinevillebeauty.com or call 318-445-1040.

FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT OF 1974 (FERPA)

The FERPA is a Federal law designed to protect the privacy of a student's education records. The law applies to all schools that receive funds under an applicable program from the U.S. Department of Education. The FERPA gives certain rights to parents regarding their children's education records. These rights transfer to the student or former student who has reached the age of eighteen (18) or is attending any school beyond the High School level. Students and former student to who the rights have transferred are called eligible students.

- Parents or eligible students have the right to inspect and review all of the student's education records maintained by the school. Schools are not required to provide copies of materials in education records unless, or reasons such as great distance, it is impossible for parents or eligible students to inspect the records personally. The school may charge a fee for copies.
- Parents and eligible students have the right to request that a school correct records believed to be inaccurate or misleading. If the school refuses to change the records, the parent or eligible student then has the right to a formal hearing. After the hearing, if the school still refuses the correction, the parent or eligible student has the right to place a statement in the records commenting on the contested information in the records.
- Generally, the school must have written permission from the parents or eligible students before releasing any information from a student's record. However, the law allows schools to disclose records, without consent, to the following parties:
 - School employees who have a need-to-know
 - Other schools to which a student is transferring
 - Parents when a student over 18 is still dependent
 - Certain government officials in order to carry out lawful functions
 - Appropriate parties in connection with financial aid to a student
 - Organizations doing certain studies for the school
 - Accredited organizations
 - Individuals who have obtained court orders or subpoenas
 - Persons who need to know in cases of health and safety emergencies
 - State and local authorities to whom disclosure is required by state law adopted before November 19, 1974

Schools may also disclose, without consent, "directory" type information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, the school must tell parents and students of the information that is designed as directory information and provide a reasonable amount of time to allow the parent or eligible student to request the school not to disclose that information about them.

Schools must notify parents and eligible students of their rights under this law. The actual means of notification (special letter, inclusion in a PTA bulletin, student handbook, or newspaper article) is left to each school.

Schools must adopt a written policy about complying with the FERPA. Schools must give the parent or eligible student a copy of the policy, on request.

| If you wish to see your child's education records; or if you are over 18 or are attending college and would like to see your records, you should contact the school for the procedure to follow. |
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| If you have any questions about FERPA, or if you have problems in securing your rights under this Act, you may call (202) 401-2057 or write to: Family Policy Compliance Office, Department of Education, 400 Maryland Avenue, S.W., Room 3017, Washington, DC 20202-4605. |
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