VIRGINIA MILITARY INSTITUTE
Lexington, Virginia

GENERAL ORDER)
NUMBER 54) 19 October 2026

Privacy Policy

1. **Purpose**: The purpose of this policy is to establish and clarify how the Virginia Military Institute (VMI) uses and manages personal and other information provided to or collected by VMI.

2. Commitment to Privacy

A. In accordance with the Commonwealth's Government Data Collection and Dissemination Practices Act (Virginia Code § 2.2-3800 *et seq*.), personal information shall not be collected unless the need for it has been clearly established and the collection of such information is appropriate and relevant to a specific purpose. Agencies of the Commonwealth, including institutions of higher education, must have a process for individuals to learn the reason that information is collected and to examine and correct their personal records.

B. VMI has a firm commitment to privacy.

C. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, VMI has implemented appropriate physical, electronic, and managerial procedures to safeguard and secure the information VMI collects, consistent with the policies of the Institute and with federal and state laws and regulations.

D. An individual has the right to review the information VMI maintains in order to verify its accuracy and request it be updated or corrected. The process for review of personal information is as follows:

1) Prospective students contact the Admissions Office;
2) Current cadets and those enrolled in the most recent 20 class years contact the Registrar's Office;
3) Former cadets who enrolled more than 20 years ago contact the VMI Archives;
4) Alumni or former cadets contact the VMI Alumni Association for alumni related information;
5) Faculty and staff contact Human Resources.

E. Contracts with third parties providing services to VMI prohibit the use of personal information for the contractor's purposes and require the contractor to maintain the confidentiality of the information provided by VMI.

F. VMI may make changes to privacy policies and procedures at any time. VMI will post those changes on its website.

G. Users of VMI-owned computers and the VMI network have no expectation of privacy in any files or information residing on VMI hardware or moving across VMI's network or in any activity that takes place on any VMI information system and infrastructure. VMI may monitor, inspect, store, or disclose any electronic communications or record on or transverse its network or systems for any legitimate purpose whenever it is deemed necessary. Monitoring of IT systems and data may include, but is not limited to, network traffic; application and data access; email and Internet usage and content.

H. VMI reserves the right to copy and examine any files or information resident on VMI systems allegedly in violation of this or any other VMI policy, rule, or regulation. In addition to potential sanctions pursuant to VMI policies, offenders may also be subject to prosecution under the law including, but not limited to, The Computer Fraud and Abuse Act of 1986, The Computer Virus Eradication Act of 1989, Interstate Transportation of Stolen Property, The Virginia Computer Crimes Act, and the Electronic Communications Privacy Act.

I. By using VMI's websites, users consent to the collection and use of information by VMI as specified in this policy.

3. Website/Internet Privacy Policy

A. Individuals are not required to provide personal information to access information on the VMI website considered public. Some dynamic web pages and forms require entry of personal information and authentication in order to interact with those pages.

B. Certain applications on the VMI website, such as the Institute's email system, library server, and Citrix may place a "cookie" on your computer. Information gathered with these cookies is only information needed to interact with the application. In addition, it is possible that third party vendors working with VMI could use cookies to push ads based on a user's prior visits to our website. Users may opt out of Google's use of cookies by visiting the Google advertising page at www.google.com/policies/technologies/ads/. Alternatively, a user can opt out of a third party's cookies by visiting the Network Advertising Initiatives opt out page, www.networkadvertising.org/choices/.

C. VMI does not share, sell, or trade information such as email address lists.

D. For statistical tracking purposes, there are several pieces of information that VMI collects each time the websites are accessed including the computer's IP address, the URL that referred a user to VMI's site, the pages accessed on VMI sites, and the type and version of both the user's operating system and web browser. VMI also tracks any terms and phrases entered into our search engine service. This information is not collected for purposes of personal identification, but rather it is used to generate reports of site usage. These reports help to identify what parts of the site are most popular, what search engines visitors are using to find VMI websites, and what information visitors are having trouble finding. These reports help VMI determine overall website usage, identify problem areas, and ultimately provide better services for visitors and all users of the website.

E. Occasionally there will be a service provided by VMI's website that will require users to provide personal information such as VMI's online admissions application, which could not be completed without providing some personal information. When VMI requests personal information, VMI protects it during transmission and provides an explanation of why users are asked to provide this information. Users choosing not to provide personal information through VMI's website may be unable to utilize some of the features. When possible, VMI will attempt to provide users with an alternative method for the same service that does not require the online provision of personal information.

F. The VMI website issues and reads cookies to track any customization options users may have selected. Users can configure a web browser to allow or disallow cookies by changing the browser's options or preferences, but disabling cookies may prevent some areas of the VMI websites from working properly.

G. VMI's website contains links to other VMI pages. The privacy practices of affiliate or personal faculty pages may vary with the purposes of the page. Consult the privacy statement on each page. VMI's website contains links to other sites. VMI is not responsible for the privacy practices or the content of such websites.

H. VMI has security measures in place to protect against the loss, misuse, and alteration of the information under VMI's control. VMI complies with all statutory requirements with respect to access to and security of information. Users should also consult VMI's policy on Acceptable Use of VMI Information Systems.

I. IT privacy concerns should be referred to the Information Technology Department. The Information Technology Security Officer can be reached at (540) 464-7725 or ISO@vmi.edu.

4. Health and Health Insurance Information

A. VMI maintains the privacy and confidentiality of employee and cadet health information and treatment records, whether generated by the VMI Infirmary or an outside healthcare entity. The following procedures provide an overview regarding how the information is used and safe guarded.

B. Authorization. A valid disclosure authorization form will be required to disclose health and health insurance information including eligibility, claim, precertification, and other information. All documentation will be maintained for a period of six years. Authorization forms are available from the Office of Human Resources or the VMI Infirmary for health records and information maintained by the VMI Infirmary and the Center for Cadet Counseling. VMI will not use or disclose any health or health insurance information without written authorization, unless permitted by applicable Virginia or federal law. Authorizations previously given may be revoked in writing.

C. The unauthorized access, use, or disclosure of health information contained in any VMI treatment record may result in the responsible employee receiving disciplinary action up

to and including employment termination. This extends to the unauthorized use or disclosure of health information that is learned, overheard during the course of business, or secured by any VMI employee by virtue of their employment with the Institute. Departments or individuals that become aware of the unauthorized use or disclosure of protected health information or treatment records by VMI employees should immediately report the incident to the Director of Human Resources. If an individual has questions about privacy rights with regard to health information and treatment records, does not understand these privacy rights, or is concerned that privacy rights have been violated, please contact one of the following:

Cadet privacy concerns

Institute Physician
VMI Infirmary
510 Burma Road
PO Box 1839
Lexington, VA 24450
Office: (540) 464-7218
Fax: (540) 464-7707

Employee privacy concerns

Human Resources
510 Burma Road
PO Box 1839

Lexington, VA 24450
Office: (540) 464-7322
Fax: (540) 464-7299

5. Freedom of Information Act Policy (FOIA)

A. VMI's FOIA policy is contained in General Order Number 5.

B. The Virginia Freedom of Information Act (FOIA), Virginia Code § 2.2-3700 et seq., provides citizens of the Commonwealth, including representatives of the media, a process to access public records held by public bodies, public officials, and public employees.

C. You may direct your request to:

FOIA Coordinator
Virginia Military Institute
510 Burma Road
PO Box 1839
Lexington VA 24450
Office: (540) 464-7132
Fax: (540) 464-7660
Email: foia@vmi.edu

You may also contact with questions you have concerning requesting records from VMI. In addition, the Virginia Freedom of Information Advisory Council is available to answer any questions you may have about FOIA. The Council may be contacted by email at foiacouncil@dls.virginia.gov, or by phone at (804) 698-1810 or [toll free] 1-866-448-4100.

6. Family Educational Rights and Privacy Act (FERPA)

VMI's FERPA policy is contained in General Order Number 9. A copy of VMI's FERPA policy can be obtained by contacting the Registrar's Office at (540) 464-7313 or at VMI's Family Educational Rights and Privacy Act (FERPA) webpage.

A. Complete information on Family Educational Rights and Privacy Act (FERPA) policies and guidelines may be found by navigating to https://studentprivacy.ed.gov/

B. VMI's FERPA Coordinator is:

Registrar's Office
Lexington, VA 24450
Office: (540) 464-7313
Fax: (540) 464-7726

FOR THE SUPERINTENDENT:

Travis Homiak
Colonel, USMC (Ret.)
Chief of Staff

OPR: COS
DIST: E, Cadets