

**Policy Index (Dean>SMS Messaging Privacy Policy)**

**Description:**

The K20 Center’s three (3) 2018 GEAR UP grants (GEAR UP for MY SUCCESS, GEAR UP for the FUTURE, and GEAR UP O+K=C) are collaborating with Modern Campus, an SMS messaging service, to better communicate with and engage first-year cohort students at a variety of college campuses. The GEAR UP grant teams identified limits in direct communication with previous cohort first-year college students which negatively impacted the GEAR UP team’s ability to provide research-based GEAR UP grant services. The Modern Campus platform will provide the opportunity to safely communicate GEAR UP grant services, events, and reminders to cohort first-year college students who opt in to receive these communications. This privacy policy will provide cohort students notice of their privacy rights as it relates to GEAR UP grant notifications.

**Approval Authority:**   
Departmental: Dean of the Jeannine Rainbolt College of Education

**Definitions**

* **Personal Data**: Information that can or could be used to identify an individual (e.g., name, phone number, postsecondary institution, graduating cohort high school, user interactions with SMS, and date, time, and content of messages).
* **Anonymous Data**: Information that cannot be used to identify an individual.
* **Opt-In**: The act of giving consent to receive SMS messages.
* **Opt-Out**: The act of withdrawing consent to receive SMS messages.

**Effective Date: 06/10/2025**

**Institution Name: K20 Center**

**Third-Party Messaging Provider: Modern Campus  
  
SMS Messaging Privacy Policy**

1. **Introduction**   
   This Privacy Policy outlines how the K20 Center collects, uses, and protects information related to text message communications (SMS) provided through Modern Campus, a third-party messaging service. This policy applies to individuals who opt-in to receive SMS messages from the K20 Center’s three (3) GEAR UP grant teams (GEAR UP for MY SUCCESS, GEAR UP for the FUTURE, and GEAR UP O+K=C).

By opting in, individuals agree to receive recurring text messages from the GEAR UP grant teams (GEAR UP SMS messages), including but not limited to financial aid and scholarship opportunities, enrollment reminders and deadlines, GEAR UP grant event updates and important announcements, and other essential GEAR UP grant communications. Message frequency may vary. Message and data rates may apply depending on an individual’s mobile carrier and plan.

1. **Information Collected**
   1. Only the necessary Personal Data to provide GEAR UP grant services to cohort students is collected. When opting in to receive SMS messages, the following Personal Data is collected:
      1. First and last name
      2. Mobile phone number
      3. Postsecondary institution
      4. Graduating cohort high school
      5. User interactions with SMS (e.g., opt-in/out actions)
      6. Date, time, and content of messages
   2. This data is used solely for communication purposes and is not sold or shared for marketing by third parties.
2. **Opt-In Consent**
   1. Individuals can opt-in to receive SMS messages in the following ways:
      1. **Online SMS Opt-In Agreement:** Complete and submit the online opt-in agreement (e.g., <https://k20.ou.edu/gutext>).
      2. **Send an Opt-In Text:** Send text message **START** to [insert identified phone number]
      3. **Paper SMS Opt-In Agreement Forms:** Complete and return the paper form to a GEAR UP grant team member from the K20 Center.
   2. All opt-ins require prior consent and are not shared with third parties.
   3. By opting in, individuals authorize the K20 Center’s GEAR UP grant team to send GEAR UP SMS messages to the provided mobile number using automated technology or manual systems through Modern Campus.
3. **Opting Out of Receiving SMS Messages**
   1. Individuals can opt-out of receiving GEAR UP SMS messages at any time.   
      Use one of the following ways to opt-out:
      1. Reply “STOP” to any previous GEAR UP SMS message.
      2. Submit a request via the SMS Opt-Out Form:   
         <https://ousurvey.qualtrics.com/jfe/form/SV_aWsHH3Mm0nq9V4O>
   2. Once individuals opt out, they will no longer receive SMS communications from the GEAR UP grant team. To re-enroll, complete one of the following SMS Opt-In methods.
4. **How Information is Used** 
   1. The K20 Center’s GEAR UP grant team members will communicate with cohort college first-year students to promote college and career-related events during the summer of 2025 through the spring of 2026.   
      Events may include:
      1. Financial aid and scholarship opportunities
      2. Enrollment reminders and deadlines
      3. GEAR UP grants’ event updates and announcements
      4. Other essential GEAR UP grant team communications
   2. The mobile phone number and related information will only be used to:
      1. Deliver requested text message communications (GEAR UP SMS messages)
      2. Respond to inquiries or requests
      3. Improve GEAR UP grants’ service delivery and message effectiveness
   3. Personal Data is **not** used for marketing or shared/sold to third parties.
   4. Modern Campus may have access to limited information necessary to deliver the GEAR UP SMS messages and is required to maintain strict confidentiality and data protection standards.
5. **Information Sharing and Security**
   1. Data is securely stored and accessible only to the authorized GEAR UP team members.
   2. Information may be disclosed only if required by law or to protect the University of Oklahoma, K20 Center, and GEAR UP grants’ operations.
   3. GEAR UP SMS opt-in data is excluded from any third-party information sharing.
   4. K20 Center and Modern Campus implement reasonable administrative, technical, and physical safeguards to protect individual’s personal information against unauthorized access, disclosure, or misuse.
6. **Data Retention**
   1. Personal data is retained only as long as necessary to provide services.
   2. Once no longer needed, data is deleted.
      1. The K20 Center’s GEAR UP team members will delete the data from the Modern Campus system after GEAR UP grant services and the final federal program report are completed.
      2. Once removed from the system, cohort students will no longer receive GEAR UP SMS messages from the Modern Campus system.
7. **Individual Rights**
   1. Individuals have the right to:
      1. Request a copy of all their Personal Data
      2. Request their Personal Data be deleted
         1. When an individual requests to be have their data deleted, they will no longer receive GEAR UP SMS messages.
         2. Upon request, the GEAR UP team members will remove the individual’s record and all their contact information from the Modern Campus system, ensuring their Personal is no longer accessible in any form.
      3. Request details about the GEAR UP SMS messages they receive
      4. Change their communication preferences
      5. Opt-out at any time without penalty
   2. Contact: [k20center@ou.edu](mailto:k20center@ou.edu) for questions or concerns.
8. **FERPA**
   1. The University of Oklahoma complies with all aspects of Public-Law 93-380, the Family Educational Rights and Privacy Act (<https://www.ou.edu/registrar/academic-records/ferpa>)
9. **Changes to This Privacy Policy**
   1. The policy in effect at the time of data collection governs the use of Personal Data.
   2. Reasonable notice will be provided for any material changes to the policy.
10. **Contact Information**
    1. If individuals have questions about this policy or their GEAR UP SMS preferences, please contact:

K20 Center  
Phone: 405-325-1267  
Email: [k20center@ou.edu](mailto:k20center@ou.edu)   
Website: <https://k20center.ou.edu/gear-up/>

1. **Forms and Tools:**
   1. K20 Center/GEAR UP grant
      1. K20 Center’s Privacy Policies: <http://k20center.ou.edu/policies>
      2. Qualtrics for Opting In: <https://k20.ou.edu/gutext>
      3. Qualtrics for Opting Out: <https://ousurvey.qualtrics.com/jfe/form/SV_aWsHH3Mm0nq9V4O>
   2. The University of Oklahoma:
      1. Privacy Policy: <https://www.ou.edu/marcomm/web/privacy-policy>
      2. University Policy and Procedure Manual: <https://universityok.navexone.com/content/?public=true&siteid=895>
   3. Modern Campus
      1. Privacy Policy: <https://moderncampus.com/about/privacy-policy.html>
      2. Data Collection and Security Policies: <https://support.moderncampus.com/cms/personalization/data-policy.html>

**Responsible Executive:** Dean of the Jeannine Rainbolt College of Education

**Date of Next Review**

06/10/2026

**Date of Last Update**

05/23/2025

**Date of Last Approval**

6/10/2025