

EEA General Data Protection Regulation Privacy Notice - University of Rochester Education Abroad Participants

This Notice describes the practices of the University of Rochester (the “University”) with respect to the collection, use, storage, and disclosure of Personal Data covered by the European Union’s General Data Protection Regulation relating to University students who are on education abroad experiences in the European Economic Area (the “EEA”), which include credit-bearing programs coordinated by the Center for Education Abroad, as well as non-credit bearing or short-term experiences, such as faculty-led trips abroad. This Notice applies only to the use of Personal Data in EEA Processing Activities.

In this policy,

- “**GDPR**” means the European Union’s General Data Protection Regulation;
- “**Personal Data**” means information that relates to an individual who is directly or indirectly identified or identifiable; and
- “**EEA Processing Activities**” means the collection, use, processing or sharing of Personal Data when those activities are within the scope of the GDPR.

In this Notice the words “we”, “us” or “our” refer to the University of Rochester, and the word “you” or “your” refers to prospective and admitted students and their families.

Personal Data We Collect

The University collects, stores, and processes the following categories of Personal Data while you are in the EEA in connection with an education abroad experience:

- Personal identification information such as your name;
- Contact information including, without limitation, email address, physical address, phone number, and other location data;
- Educational and academic records including information regarding admission, registration, enrollment, course data, grades, transcripts, and other course and degree related information;
- Incident reports concerning the safety or academic integrity of University students, including you, including student conduct records, disciplinary records, and reports from foreign institutions and police records;
- Your violations of any codes of conduct or other University policy;
- Travel documents, including itinerary and passport details;
- Insurance information;
- Emergency contact information;
- Photographs of you;
- Medical information and health condition information (including injuries, diseases, allergies and food intolerances); and

- Other information you may include in software programs that the University uses to administer its education abroad programs.

How We Collect Personal Data

A primary source of Personal Data collected is provided by you through your applications completed in the University's Education Abroad Portal and use of software programs that the University uses to administer its education abroad programs. You may also provide us with Personal Data through other means, including through communications with University faculty or staff. We may receive your Personal Data when other individuals or organizations provide it to us, including our local third party education partners located in the EEA, or other individuals or organizations who are involved in your education abroad program. We may also receive Personal Data from governmental entities and law enforcement officials.

Purposes and Legal Basis for Processing Personal Data

We process your Personal Data to operate study abroad, exchange, and internship programs in the EEA, and to perform academic and other services to you in connection with those programs. We also process your Personal Data to administer the University and programs you are enrolled in (including, for example, for enrollment, establishing education records, evaluating academic performance, granting degrees and internal reporting). We also process your Personal Data to facilitate your safety, assist with emergency or other healthcare treatment or arrangements, communicate with law enforcement and other government authorities, address student conduct matters, and fulfill any obligations the University may have under University policy or applicable U.S. or law applicable in the EEA. If you are the victim or alleged perpetrator of sexual or gender-based misconduct and/or of other criminal behavior while you are in the EEA, the University will transfer your Personal Data related to such matter to the United States and will address the matter in accordance with University policy and applicable U.S. law (including but not limited to Title IX and the Clery Act).

The University considers the processing of your Personal Data in connection with your education abroad program to be necessary for the performance of our contractual obligations with you (for example, to provide you educational programs), and necessary for the pursuit of the legitimate interests of the University (for example, to provide educational offerings, provide education abroad experiences, administer the University's programs, communicate with law enforcement and other government authorities, address student conduct matters, and fulfill any obligations the University may have under University policy or applicable U.S. or law applicable in the EEA). The University may also process your Personal Data to comply with laws applicable in the European Union or its member states.

Your consent is required for the University to process "special categories" of Personal Data, which include data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data

concerning a natural person's sex life or sexual orientation. The University will process such "special categories" of data in accordance with the purposes set forth in this Notice. Unless the processing activities include "special categories" of your Personal Data, the University does not require your consent to process such data in connection with an education abroad experience.

How We Share Personal Data

Your Personal Data will be received and processed by University representatives in connection with the purposes of processing described above. We may share your Personal Data among University divisions, programs and initiatives as described above. We may also share the information with service providers we have retained to perform services on our behalf, such as to third-party program providers and organizations or institutions who host programs abroad such as exchanges or internships.

We may also disclose your Personal Data to legal or government regulatory authorities as required by applicable law. We also disclose your Personal Data to third parties as required by applicable law in connection with claims, disputes or litigation, when otherwise required by applicable law, or if we determine its disclosure is necessary to protect the health, safety, rights or property of you, us or others, or to enforce our legal rights or contractual commitments that you have made.

How We Protect Your Data

The University uses risk-assessed administrative, technical, and physical security measures to protect against unauthorized use, disclosure, alteration, or destruction of the personally-identifiable information we collect. Only authenticated users with specific permissions may access the data. We encrypt your data in transit using secure TLS cryptographic protocols. We use network segmentation and monitoring to evaluate any attempts at accessing the systems without permission. We maintain a documented vulnerability management program which includes periodic scan, identification, and remediation of security vulnerabilities. Critical patches are applied to servers and workstations on a priority basis. We also conduct regular internal and external penetration tests and remediate according to severity for any results found. All University Information Security Policies and Procedures are based upon current industry best practices and common security frameworks.

Your Rights

You have certain rights regarding your Personal Data, subject to certain exclusions as described in the GDPR. This Notice summarizes what these rights under the GDPR involve and how you can exercise these rights. More detail about each right, including exceptions and limitations, can be found in the applicable text of the GDPR.

- Right of Access – You have the right to request that the University confirm whether it is processing your Personal Data. If the University is processing your Personal Data, you

have the right to access that Personal Data, and the University will provide you with a copy of that Personal Data unless prevented by applicable law;

- Right of Rectification – You have the right to request that the University correct any inaccurate Personal Data that it maintains about you;
- Right of Erasure – You have the right to request the erasure of Personal Data that the University maintains about you in certain circumstances;
- Right to Restrict Processing – You have the right to request that the University restrict the processing of your Personal Data where one of the reasons identified in the GDPR apply;
- Right to Data Portability – In certain situations, you have the right to request a copy of your Personal Data in electronic format so that you can transmit the data to third parties, or to request that the University directly transfer your Personal Data to one or more third parties;
- Right to Object to Processing – In certain situations, you may have the right to object to processing of your Personal Data;
- Right to File Complaint – You have the right to file a complaint with your applicable European Union supervisory authority if you believe that the University's processing of your Personal Data violates the GDPR.

In addition, if the basis for processing your Personal Data is consent, you may revoke your consent at any time. Note that, in certain cases, we may continue to process your Personal Data after you have withdrawn consent and requested that we delete your Personal Data, if we have a legal basis to do so.

Data Retention

The GDPR requires that your Personal Data be kept no longer than necessary. The applicable time period will depend on the nature of such personal data and will also be determined by legal requirements imposed under applicable laws and regulations. The University's current Policy on Retention of University Records is available here:

<https://www.rochester.edu/adminfinance/records.html>.

International Data Transfers

As the University is based in the United States, Personal Data that you provide while in the EEA will generally be transferred to the United States. We may transfer your Personal Data from a country in the EEA to a country outside the EEA after having obtained your explicit and informed consent. The United States may not provide the same level of protection of Personal Data as those jurisdictions located in the EEA, and transfer based upon your consent may take place in the absence of an adequacy decision by European Union authorities or appropriate safeguards (such as Standard Contractual Clauses). We may also transfer your Personal Data outside the EEA and rely on appropriate or suitable safeguards recognized under data protection laws. The European Commission has adopted standard data protection clauses, which provide safeguards for personal information transferred outside of the EEA. We may use Standard Contractual Clauses when transferring Personal Data from a country in the EEA to a

country outside the EEA. Where applicable, you can request a copy of our Standard Contractual Clauses by contacting us as set forth in the Contact Information section below. We may also transfer your Personal Data outside the EEA if (i) the transfer is necessary to the performance of a contract between you and the University, or if the transfer is necessary to the performance of a contract between the University and a third party, and the contract was entered into in your interest, or (ii) the transfer is necessary in order to protect your vital interests or of other persons, where you are physically or legally incapable of giving consent.

Policy Updates

We may change this Notice from time to time. We will publish on our website any changes we make to this Notice and notify you by other communication channels where appropriate.

Contact Information

If you have any questions, comments, requests or concerns about this Notice, you may contact either of these two offices:

Center for Education Abroad at abroad@rochester.edu or (585) 275-7532

Office for Global Engagement at global@rochester.edu or (585) 273-1665