

International Data Protection Law Privacy Notice for University of Rochester Alumni and Friends

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 International Data Protection Law relating to alumni and friends of the University who are outside of the United States in the context of the University’s alumni relations and development activities. This Notice applies only to the use of Personal Data in International Processing Activities.

In this policy,

- “**Personal Data**” means information that relates to an individual who is directly or indirectly identified or identifiable.
- “**International Processing Activities**” means the means the collection, use, processing or sharing of Personal Data when those activities are within the scope of an applicable International Data Protection Law.
- “**International Data Protection Law**” means any law, rule or regulation regulating the collection, processing, use or security of Personal Data in a jurisdiction outside of the United States, including, without limitation, the GDPR.
- “**GDPR**” means the European Union’s General Data Protection Regulation.

In this Notice the words “we”, “us” or “our” refer to the University of Rochester, including its Office of Advancement, and the word “you” or “your” refers to all alumni and friends of the University who are located outside of the United States. In this Notice, “friends of the University” includes all donors, prospective donors, students, family of students, volunteers, faculty and staff of the University.

Personal Data We Collect

We collect, store, and process a variety of Personal Data in circumstances that may involve International Processing Activities. The University collects the following categories of Personal Data in the context of its alumni relations and development activities:

- Biographic and contact information – home and business addresses, country location, email addresses, phone numbers and social media contact information;
- Demographic information – name, preferred name, preferred pronouns, gender, birth and death dates, student identification number and ethnicity;
- Educational details – school, degree type, major, year and activities;
- Family information – family member names, ages and birth dates and family relationships;
- Employment information – company, job titles, job functions and industry information
- Donor information – personal giving history, philanthropic interests, and publicly available data on wealth and assets;

- Interactions with the University – attendance at university events, program interests, committee participation, and volunteer service;
- Communication preferences – indicating your preferences about how the University engages with you;
- Analytic information - related to visit activity at our web sites and email marketing responses; and
- Your image – your photograph or video image.

How We Collect Personal Data

Much of the Personal Data we collect and store is provided by you through normal business interactions (e.g. event registrations, gift transactions, the online alumni directory, surveys, career networking applications, or communications either by phone or in person). Additionally, if you are or were a student at the University then your Personal Data such as name, address, date of birth, participation in student activities as well as degrees, academic awards and honors received will be transferred from the student database to the alumni database. We may also collect Personal Data about you from other University personnel or students. For example, we may collect contact information for our student’s parents and family members from our students.

We may also augment your Personal Data with information obtained from internet searches, publicly available directories, third party service providers and social media sites (Facebook, LinkedIn, and Twitter).

Purposes and Legal Basis for Processing Personal Data

We process your Personal Data for a number of interdependent purposes in support of alumni relations, community engagement, communications, fundraising and financial processing. For example, we use your Personal Data to:

- Provide you with printed or electronic communications from the University;
- Invite you to alumni and other University events;
- Design programming that may be of interest to you;
- Send you information about volunteer opportunities and activities;
- Solicit funds for University initiatives or programs;
- Process donations to the University;
- Conduct surveys, including alumni satisfaction, donation preferences and interests;
- Provide online services such as the alumni directory and career networking applications;
- Administer an event for which you have registered or attended; and
- Satisfy legal, regulatory and contractual obligations.

The University’s lawful bases for processing your Personal Data include the following: (i) the University’s legitimate interests, (ii) to carry out our responsibilities under a contract, to process transactions requested by you or in order to take steps at your request prior to entering into a

transaction or contract, (iii) to comply with applicable laws, or (iv) your consent, where applicable. With respect to item (i) above, we have a legitimate interest in maintaining relationships with University alumni and friends of the University, providing services to alumni and friends of the University, raising funds to support the University's mission and programs, in communicating information regarding the University's programs and operations, and in complying with laws and regulations that govern our conduct in the countries where we operate.

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. We may also share the information with service providers we have retained to perform services on our behalf, such as to process direct mail, to provide postal addresses, to provide online directory and career networking services or to manage alumni and fundraising events. We share your Personal Data with such service providers only when they have agreed to process your Personal Data only to provide services to us and have agreed to protect your Personal Data from unauthorized use, access, or disclosure.

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

Depending on the applicable International Data Protection Law, you have certain rights regarding your Personal Data. This Notice summarizes what these rights may include, and if applicable, how you can exercise these rights. More detail about each right, including

exceptions and limitations, can be found in the applicable text of the International Data Protection Law.

- Right of Access – You may 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 may 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 may have the right to request that the University correct any inaccurate Personal Data that it maintains about you;
- Right of Erasure – You may have the right to request the erasure of Personal Data that the University maintains about you in certain circumstances;
- Right to Restrict Processing – You may have the right to request that the University restrict the processing of your Personal Data where one of the reasons identified in the applicable International Data Protection Law apply;
- Right to Data Portability – You may 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 – You may have the right to object to processing of your Personal Data;
- Right to File Complaint – You may have the right to file a complaint with your applicable regulatory authority if you believe that the University’s processing of your Personal Data violates applicable International Data Protection Law.

In addition, if the basis for processing your Personal Data is consent under GDPR, 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 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 in connection with alumni relations and development activities will generally be transferred to the United States. The United State is not considered a privacy safe harbor by European Union competent authorities due to the absence of appropriate safeguards. Additionally, the University may transfer your Personal Data to its affiliates or third-party service providers inside or outside of the United States for the above purposes.

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 Joseph Meister, Associate Vice President of Advancement Services, at jmeister@admin.rochester.edu or 585-276-3810.