

## Privacy Statement for Alumni, Donors and other Tufts Supporters

*Effective starting May 25, 2018, last revised effective on March 1, 2022*

The following Statement has been prepared to provide notice to alumni and donors whose personal data is collected, used or otherwise processed by Tufts University, including its schools, in connection with being an alumnus, donor, or other supporter. This statement provides notice under the laws and regulations that include notice and other requirements that may apply to your personal data (together, the Privacy Laws). Among those Privacy Laws are the General Data Protection Regulation for the European Economic Area (EEA) (regulation (EU) 2016/679 of the European Parliament) (EEA GDPR) and the United Kingdom General Data Protection Regulation, as tailored by the Data Protection Act 2018 of the UK (the UK GDPR). The Tufts University PIPL Privacy Statement applies to personal information subject to the Personal Information Protection Law (PIPL) of the People's Republic of China. Tufts is committed to processing your personal data in compliance with the Privacy Laws and has prepared this statement to provide you with information about your rights under the Privacy Laws, including the EEA GDPR and the UK GDPR.

This statement should also be read together with the [Global Privacy Statement for Personal Data](#), which provides information regarding:

- What is “personal data” and what does “processing” mean?
- If I am outside of the United States, will my personal data be transferred out of the country where I am located or reside?
- What rights do I have with respect to my personal data?

This Statement discloses the privacy practices for the personal data of Tufts alumni and donors. Please read these terms together with the Privacy Statements found at [Privacy](#) and the [Privacy Policy for Alumni Data](#).

The Tufts University Alumni Association and the Tufts University Advancement Division respect your right to privacy and will only use your information for university-related purposes. It is Tufts’ policy to use legally required and industry standard methods to secure such data.

This Statement explains how Tufts handles and uses the personal data we collect about our alumni and our past, current and future supporters, whether donors, volunteers or participants in membership groups that we run. “Tufts” in this context means the central university, our individual schools, departments and research institutes, and the libraries and other cultural and recreational facilities that we operate. Developing a better understanding of our alumni, donors and other supporters allows us to keep in touch with you, in order to keep you apprised of our activities and developments, to provide services to you, and to identify ways in which you can support us, through donations or other forms of financial and non-financial support.

### 1. Personal data held by Tufts

We may hold information relating to you from a number of sources. A significant proportion of the personal data we hold on alumni, donors and supporters is provided to us directly (for example, an alumnus may give us information by filling in forms on the Tufts website, or by corresponding with us by telephone, email or otherwise). If you are a student or studied at Tufts, some of your personal information is transferred from your student record to Tufts University Advancement databases.

The information we hold about you may or may not be personal data within the scope of the EEA GDPR, the UK GDPR or other Privacy Laws. Among the information records may contain are:

- details of your education (e.g. your school(s), areas of study, dates of study)
- unique personal identifiers and biographical information (e.g. student number, date of birth)
- your contact details (and we update these whenever you let us know that they have changed)
- details of your interactions with Tufts, including:
  - your membership of clubs, societies, and alumni groups
  - your attendance at Tufts events
  - other contact with us or our partners
  - your relationships with other Tufts alumni, donors or supporters

- details about your family (e.g. your marital status, the name of your partner or spouse)
- personal data provided by you for a specific purpose (e.g. disability and dietary preferences for event management purposes)
- your communication preferences, to help us provide tailored and relevant communications.

We also record, where applicable, based on information that you provide to us and, in some cases, publicly available information and information from our partners:

- financial information relating to you and your family, including:
  - your history of donations made to Tufts
  - your ability and willingness to make donations, including our assessment of your income and whether particular donations or funding appeals may be of interest to you
  - your philanthropy and other giving, including donations to other organizations and other support that you provide (e.g. details of volunteering roles)
- your career highlights and other life achievements
- information about your areas of interest and extra-curricular activities

We augment the data we hold from Tufts with data from our collaborators and publicly available data. We use targeted internet searches and may search the following (either directly or using search engines), where relevant in order to obtain and maintain the accuracy of the data listed above:

- Public sources for companies (in order to find personal data of those companies' employees, etc.), including company websites
- Public sources for charities (in order to find personal data of those charities' employees, trustees, etc., and to find information about donations and support)
- Public sources for individuals
- Press sources

In addition to this, Tufts may process some personal data about you that is classified as "special category" or sensitive personal data, which requires additional protections. Under the EEA GDPR and the UK GDPR, and possibly other Privacy Laws, this includes information concerning your race, ethnicity, sexual orientation, political opinions, religious beliefs or health/disability that we use for planning purposes, or in order to provide help or suitable assistance. Access to, and the sharing of, this sensitive or "special category" personal data are managed very carefully.

## 2. How your personal data is used by Tufts

We may use automated or manual analyses to link personal data together to help us identify your potential for supporting Tufts, to provide you with an improved experience, to send you communications which are relevant and timely, to identify volunteering opportunities or opportunities for providing support which may be of interest to you, and to avoid approaching you with opportunities which are not of interest. All of this enables us to raise more funds, sooner, and more cost-effectively, in support of Tufts' strategic research and teaching objectives. We always seek to ensure that any opportunities we present are aligned with your interests, based on the research we conduct.

Your personal data is used by us for a number of interdependent purposes in support of alumni relations, communications and fundraising. These include:

- sending you publications, alumni magazines, and news and updates about Tufts
- conducting surveys, including research on when and whether particular donations or funding appeals may be of interest to you
- providing services, including access to Tufts facilities and alumni and donor email accounts
- providing an alumni directory within the password-protected Tufts University Online community
- sending you information about giving opportunities, tailored proposals, appeals and requests for donations
- sending you details of volunteering opportunities
- inviting you to alumni, donor, and other Tufts events
- the promotion of other opportunities and services available to you (e.g. offers and opportunities available through

Tufts' network of alumni, donor and supporter groups)

- wealth analysis and research in order to improve our understanding of our alumni, donors and supporters, inform our fundraising strategy and target our communications more effectively
- internal record keeping, including the management of any feedback or complaints
- administrative purposes (e.g. in order to process a donation you have made or to administer an event you have registered for or attended)

The Tufts University Alumni Association and the Tufts University Advancement Division has also occasionally approved sharing alumni, donor and supporter data with companies and institutions that desire to offer services and benefits to Tufts alumni, donors and supporters at a discounted rate. Any third parties who receive alumni, donor and supporter data for this purpose are prohibited from using or sharing the data for any purpose other than providing services to Tufts or to its alumni, donors and supporters.

Communications to you may be sent by mail, telephone or electronic means, depending on the contact details we hold and the preferences expressed by you about the types of communications you wish to receive. Alumni may at any time opt-out of receiving all emails from the alumni association, or just emails from companies and institutions offering services and benefits to alumni, by clicking on the "update your email subscription preferences" link in emails and following the specified instructions, or by calling 1-800-THE-ALUM (1-800-843-2586) or 617-627-3532, by faxing a request to 617-627-3938, or by mailing a request to Tufts University Alumni Association, 80 George St., Ste. 100-3, Medford, MA 02155.

### 3. The purposes and lawful bases for processing your personal data

The purposes and lawful bases for processing your personal data include being necessary for the pursuit of our legitimate interests, the carrying out of a task in the public interest, and in some instances, the performance of a contract. We always endeavor to handle your personal data securely and minimize its use.

### 4. How we protect your personal data

It is Tufts' policy to have appropriate data sharing agreements in place before sharing your personal data.

We do not sell your personal data to third parties under any circumstances, or permit third parties to sell the personal data we have shared with them. In addition, it is Tufts policy to prohibit any third party (except those selected by the Tufts University Alumni Association and University Advancement) from using alumni, donor or supporter data for any commercial or business marketing.

### 5. How long will my personal data be kept?

We will retain your personal data indefinitely in support of your lifelong relationship with Tufts or until you request us to do otherwise. Further information about Tufts' record retention practices can be found at our [Records Retention Schedule](#).

### 6. Where can I go if I have questions?

If you have any questions about how your personal data is used, or wish to exercise any of your rights, please consult the [Global Privacy Statement for Personal Information](#) and [How to make a Subject Access Request](#). If you need further assistance, please contact Tufts' Data Privacy Team at [dataprivacy@tufts.edu](mailto:dataprivacy@tufts.edu).

If you are not happy with the way your personal data is being handled, or with the response received from us, then the EEA GDPR and the UK GDPR provide you the right to lodge a complaint with the GDPR supervisory authority or commissioner in the country where you habitually reside, where you work, or where you believe an infringement of the GDPR occurred.

You may have similar rights under other Privacy Laws.

### 7. Changes to this Privacy Statement

Tufts University reserves the right to change, modify, or otherwise amend this Privacy Statement at its sole discretion and at any time as it deems circumstances warrant. Any such changes will be posted on this page.

This Privacy Statement was last updated effective on March 1, 2022.