

European Economic Area (EEA) Privacy Statement for Online Education and/or Non-Degree Educational Programs

Effective starting May 25, 2018, last revised effective on January 1, 2021

This statement provides information about the use of EEA Personal Data and UK Personal Data provided by or about prospective and enrolled students and learners in online courses and/or non-degree educational programs at Tufts University, including all of its schools and affiliated centers.

The students and other learners may include high-school students, working professionals, alumni, community members, lifelong learners, Tufts students, and Tufts faculty and staff.

Our courses and programs may be offered by Tufts faculty and staff and/or in collaboration with other universities or other organizations that support online, travel and other learning experiences.

Tufts' online courses include degree programs offered completely online, degree programs offered in a hybrid form of online courses together with on campus or other in person sessions, courses for credit in degree programs provided primarily on campus, and many courses offered in our educational programs that do not award a degree.

Tufts' schools offer many programs that provide engaging educational experiences without requiring the participants to commit to seeking a degree. Our non-degree educational programs include online, on campus and/or other in person sessions. They may be focused over a few days or weeks, winter term, summer term, during the academic year, a full year or longer. Among our non-degree programs are:

- Programs granting a certificate upon completion
- Continuing education programs for professionals
- Executive education programs
- Pre-college and college courses for high school students
- Courses offered to learners who are not receiving academic credit toward a degree, that may also be offered for credit to students enrolled in degree programs
- Special, focused programs offered to learners, but that do not grant credit toward a Tufts academic degree
- Programs offered off campus that include travel to places around the world

This statement provides notice under the General Data Protection Regulation (GDPR) for the European Economic Area (EEA) and the Data Protection Act 2018 of the UK (the UK DPA). The GDPR and the UK DPA govern the use and processing of personal information. Tufts is committed to processing your EEA Personal Data and UK Personal Data in compliance with the GDPR and UK DPA and has prepared this statement to provide you with information about your rights under the GDPR and the UK DPA.

This statement should be read together with the [EEA and UK Privacy Statement](#). Additional EEA and UK Privacy Statements are also provided for other programs at Tufts, including for students applying to our degree programs and enrolling in those programs. See our [EEA and UK Privacy Statements](#).

Tufts-Sponsored Study Abroad Programs. Students applying for or enrolling in Tufts' Study Abroad Programs in the EEA or UK should review the [EEA and UK Privacy Statement for Students in Tufts-Sponsored Study Abroad Programs in the EEA and UK](#).

Offerings with Other Parties or Institutions. Students enrolling in the online programs offered in collaboration with another entity or institutions should also review such parties' privacy policies for those programs, available under the websites of such parties (the "Collaboration Parties").

1. What is "EEA Personal Data" and "UK Personal Data?"

For purposes of this statement, your personal information is EEA Personal Data if it is "personal data" (as defined in the GDPR) and you are in the EEA when you provide (or arrange to provide) the personal information to us in connection with your interest in or your participation in our online courses and/or non-degree educational programs.

For purposes of this statement, your personal information is UK Personal Data if it is “personal data” (as defined in the UK DPA) and you are in the UK when you provide the personal information to us in connection with your interest in or your participation in our online courses and/or non-degree educational programs.

The GDPR and the UK DPA define “personal data” broadly. It means any information relating to an identified or identifiable living, natural person. Examples of personal data include your name, an identification number, location data, an online identifier and factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

The GDPR and the UK DPA often use the term “processing,” which includes any way of working with personal data, from collecting to using to sharing to disposing of it.

Programs with sessions in the EEA or the UK. Under the GDPR and UK DPA, in some cases personal data may be in scope of the regulation regardless of where you are located when you provide us the information. This is the case if it is provided in the context of the activities of an establishment in the EEA or UK. Tufts offers many programs from time to time that may include sessions in the EEA or UK, but generally we do not consider those programs part of an establishment in the EEA or UK. However, for our established Tufts-sponsored Study Abroad programs, we include in EEA Personal Data or UK Personal Data all personal information Tufts collects or otherwise processes in the context of those programs. More information is provided in [EEA and UK Privacy Statement for Students in Tufts-Sponsored Study Abroad Programs in the EEA and UK](#).

2. Who will process my EEA Personal Data and UK Personal Data?

The information provided here applies to the collection, use, sharing, disclosure and other processing of your EEA Personal Data and UK Personal Data by Tufts University and its schools in connection with our online courses and non-degree educational programs. The departments and offices providing these courses and other programs may also provide you with additional statements about how they will collect, use, share, disclose and otherwise process your EEA Personal Data and UK Personal Data.

3. What EEA Personal Data and UK Personal Data will be collected, used or otherwise processed?

Tufts collects your personal information when you inquire about and apply for our online education courses and other non-degree educational programs. Further personal information collection also occurs when you enroll in an offering, when you start participating in the offering and throughout your online and other education interactions.

Your EEA Personal Data and UK Personal Data is created, stored and transmitted in a variety of paper and electronic formats, including databases at Tufts (such as the main student records database, or the systems used by Tufts libraries). It is Tufts’ policy to limit access to and the use of your EEA Personal Data and UK Personal Data to Tufts staff, faculty and authorized affiliates, Collaborating Parties and third party vendors who have a legitimate interest in it for the purpose of carrying out their professional and contractual duties.

Admissions and financial aid decisions, if any, are not automated.

Online Courses

The following personal information is collected or received by Tufts, or collected on our behalf, for the primary purpose of providing online education courses; if applicable, evaluating qualification for online education certificates and credit; and for communication with you following your participation in the course. The information collected and used for a particular online course may not include all of the information listed below. For example, we may collect or receive:

Category of Personal Data (including Optional and Required Personal Data)	Purposes of Collecting and other Processing	GDPR and UK DPA Legal Bases for Collecting and other Processing
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<p>Contact Information including your name, home or school address, email address, phone numbers, and emergency contact information</p>	<p>To respond to requests for information from you and communicate course-related information and requirements, announcements, and additional program offerings; when applicable, to establish a record for your admissions and financial aid application processes and communicate your application and financial aid status and decision; to register you for courses and communicate with you regarding your course enrollment; emergency management; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Identifying Information including date and/or place of birth, Social Security number or other personal governmental identifier, passport number, alien registration number, citizenship or immigration status</p>	<p>To create a unique personally identifying record; to identify minors to apply policies; when applicable, to evaluate eligibility for financial aid, including prior financial aid for education; to establish a Bursar's account; if enroll, for a criminal background check; statistical purposes</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>For compliance with a legal obligation</p> <p>Your consent, if applicable</p>
<p>Demographic Information including race, ethnicity, gender, including gender preference, sexual orientation, age, marital status, health and disability, photo, and other information you may volunteer in your application or essay</p>	<p>To evaluate the application process, for planning and monitoring purposes; to provide you with information regarding diversity initiatives and engagement opportunities; when applicable, to evaluate your eligibility for admission; in order to provide care, help or suitable adjustments; for required regulatory reporting; to evaluate eligibility for merit and endowed scholarships with specific requirements; with respect to marital status, in some cases, to evaluate eligibility for financial aid; to issue an identification card; event planning; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>For compliance with a legal obligation</p> <p>Your consent, if applicable</p>

<p>Education History including your prior schools, transcripts, school activities, scholarly work, and disciplinary records</p>	<p>When applicable, to evaluate your eligibility for admission to the course; to provide academic guidance and evaluate your eligibility for a non-credit credential or academic credit; to determine what schools you previously attended so that we may verify we have complete information; to evaluate eligibility for merit and endowed scholarships with specific requirements; to respond to records requests; to evaluate and access the type of violation committed and how it may impact our student community</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Testing History including standardized testing and corresponding identity verification documentation</p>	<p>To evaluate your eligibility for admission; to evaluate your eligibility for a non-credit offering or credential or academic credit; to evaluate English language competency; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Personal History including interests, extracurricular activities, community membership, references and recommendations, and other personal information you may choose to volunteer about yourself, your family members, or other persons, including in your application, and other information we may learn about your or their background</p>	<p>To evaluate your eligibility for admission; to evaluate eligibility for merit and endowed scholarships with specific requirements; to apply community discounts; to connect you with other students and alumni with similar interests; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Employment and Professional History and Criminal Record including resume or CV, job title, location, and work experience, professional certifications, and your self-reported and publicly available criminal record</p>	<p>When applicable, to evaluate your eligibility for acceptance for certain online courses; to evaluate eligibility for merit and endowed scholarships with specific requirements; to evaluate and access the type of violation committed and how it may impact our online community; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>For compliance with a legal obligation</p> <p>Your consent, if applicable</p>
<p>Personal Financial Information including Social Security number or other tax identification number, personal and business tax reports, wages and benefits, scholarships and grants, bank statements and account numbers, socioeconomic status, and family support</p>	<p>When applicable, to evaluate your eligibility for financial aid and determining what financial aid will be offered to you; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>For compliance with a legal obligation</p> <p>Your consent, if applicable</p>

<p>Family Financial Information including family member names, ages, education, occupations, wages, and savings</p>	<p>To evaluate your eligibility for financial aid and determining what financial aid will be offered to you; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Payment Information depending on your means of payment, your payment card number or your bank and bank account number</p>	<p>To receive payment for course fees, other expenses, including library fees, dorm charges and healthcare or insurance fees, and refunds, if applicable</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Tax Information including tax identification number</p>	<p>To provide required information to tax authorities; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>For compliance with a legal obligation</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Learner Interaction Data including profile information, blog posts and community posts</p>	<p>To publish your messages to the online education platform; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Course Assessment Data including assignment responses, test scores, and course interactions</p>	<p>To evaluate your success in the online education offering; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Log Files including IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data</p>	<p>To evaluate your engagement with the course, maintain the security of our Services, detect fraud, and protect our rights</p>	<p>Legitimate interests</p>
<p>Location Information including latitude, longitude, date and time (the precision of this data varies greatly and is determined by factors controlled by your device or mobile service provider)</p>	<p>To offer you certain location- based services, such as delivering advertisements that are relevant to your particular location, and to conduct analytics to improve the offerings</p>	<p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Biometric Data including facial measurements and eye movement</p>	<p>To provide secure, remote online testing platforms for course evaluations</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>

Non-Degree Educational Programs

The following personal information may be collected or received by Tufts, or on our behalf, for the primary purpose of providing non-degree educational programs; if applicable, evaluating qualification for education certificates and credit; and communication with you following your participation in the program. The information collected and used by a particular program school may not include all of the information listed below. For example, we may collect and receive:

Category of Personal Data (including Optional and Required Personal Data)	Purposes of Collecting and other Processing	GDPR and UK DPA Legal Bases for Collecting and other Processing
<p>Contact Information including your name, home or school address, email address, phone numbers, and emergency contact information</p>	<p>To respond to requests for information from you and communicate program-related information and requirements, announcements, and additional program offerings; when applicable, to establish a record for your admissions and financial aid application processes and communicate your application and financial aid status and decision; to register you for the program and communicate with you regarding your enrollment; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Identifying Information including date and/or place of birth, Social Security number or other personal governmental identifier, passport number, alien registration number, citizenship or immigration status</p>	<p>To create a unique personally identifying record; to identify minors to apply policies; to determine if a visa is required for program participation; when applicable; to evaluate eligibility for financial aid, including prior financial aid for education; to establish a Bursar's account; if enroll, for a criminal background check; statistical purposes</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>For compliance with a legal obligation</p> <p>Your consent, if applicable</p>
<p>Demographic Information including race, ethnicity, gender, including gender preference, sexual orientation, age, marital status, health and disability, photo, and other information you may volunteer in your application or essay</p>	<p>To evaluate the application process, for planning and monitoring purposes; to provide you with information regarding diversity initiatives and engagement opportunities; when applicable, to evaluate your eligibility for admission; in order to provide care, help or suitable adjustments; for required regulatory reporting; to evaluate eligibility for merit and endowed scholarships with specific requirements; with respect to marital status, in some cases, to evaluate eligibility for financial aid; to issue an identification card; event planning; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>For compliance with a legal obligation</p> <p>Your consent, if applicable</p>

<p>Education History including your prior schools, transcripts, school activities, scholarly work, and disciplinary records</p>	<p>When applicable, to evaluate your eligibility for admission to the program; to provide educational guidance and evaluate your eligibility for a non-credit credential or academic credit; to determine what schools you previously attended so that we may verify we have complete information; to evaluate eligibility for merit and endowed scholarships with specific requirements; to respond to records requests; to evaluate and access the type of violation committed and how it may impact our community</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Testing History including standardized testing and corresponding identity verification documentation</p>	<p>To evaluate your eligibility for admission to the program; to evaluate your eligibility for a non-credit offering or credential or academic credit; to evaluate English language competency; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Personal History including interests, extracurricular activities, community membership, references and recommendations, and other personal information you may choose to volunteer about yourself, your family members, or other persons, including in your application, and other information we may learn about your or their background</p>	<p>To evaluate your eligibility for admission to the program; to evaluate eligibility for merit and endowed scholarships with specific requirements; to apply community discounts; to connect you with other students, program participants and alumni with similar interests; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Employment and Professional History and Criminal Record including resume or CV, job title, location, and work experience, professional certifications, and your self-reported and publicly available criminal record</p>	<p>When applicable, to evaluate your eligibility for acceptance to the program; to evaluate eligibility for merit and endowed scholarships with specific requirements; to evaluate and access the type of violation committed and how it may impact our community; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>For compliance with a legal obligation</p> <p>Your consent, if applicable</p>
<p>Personal Financial Information including Social Security number or other tax identification number, personal and business tax reports, wages and benefits, scholarships and grants, bank statements and account numbers, socioeconomic status, and family support</p>	<p>When applicable, to evaluate your eligibility for financial aid and determining what financial aid will be offered to you; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>For compliance with a legal obligation</p> <p>Your consent, if applicable</p>

Family Financial Information including family member names, ages, education, occupations, wages, and savings	To evaluate your eligibility for financial aid and determining what financial aid will be offered to you; to respond to records requests	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Payment Information depending on your means of payment, your payment card number or your bank and bank account number	To receive payment for course fees, other expenses, including library fees, dorm charges and healthcare or insurance fees, and refunds, if applicable	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Tax Information including tax identification number	To provide required information to tax authorities; to respond to records requests	To process transactions requested by you and meet our contractual obligations For compliance with a legal obligation Legitimate interests Your consent, if applicable
Program Assessment Data including assignment responses, test scores, and course and other program interactions	To evaluate your success in the program; to respond to records requests	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Disability Information including physical and mental disabilities	To provide you with proper accommodations	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Dietary Information including allergies and food preferences	When applicable, to provide proper dietary options	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Residential Information including personal preferences, security key card activity, facility monitoring and personal monitoring	When applicable, to provide a safe and secure residential experience for all program participants	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable

Processing of Special Category Information

In addition to the information listed in the tables above, Tufts may process some EEA Personal Data and UK Personal Data about you that is classified as “special category” personal data, which requires additional protections. This includes information concerning your race, ethnicity, sexual orientation, religious beliefs, health or disability that we use for planning and monitoring purposes, or in order to provide care, help or suitable adjustments. For certain programs of study, other sensitive information may be processed, such as information about past criminal convictions and your fitness to practice in certain regulated professions. Access to, and the sharing of, this sensitive or “special category” personal data are controlled very carefully.

We consider the processing of this EEA Personal Data and UK Personal Data to be necessary for compliance with a legal obligation (e.g. equal opportunities monitoring), or necessary for the professional licensing requirements or the performance of tasks we carry out in the public interest (e.g. teaching and research). If we require your consent for any specific use of your EEA Personal Data or UK Personal Data, we will collect it at the appropriate time.

Tufts' [Non-Discrimination Policy](#) "prohibits discrimination against and harassment of any student, employee, applicant for employment, third party or community member because of race; color; national or ethnic origin; age; religion; disability; sex; sexual orientation; gender; gender identity and expression; including a transgender identity; genetics; veteran status; retaliation; and any other characteristic protected under applicable federal or state law."

Sources of Information for Online Courses and Non-Degree Educational Programs

Tufts will use the details provided in your application, if any, together with the supporting documents requested and additional details provided by any persons submitting letters of recommendation or recorded following an interview, if one is conducted.

Tufts will also use personal details you provide on any inquiry form (web-based, hand-written inquiry cards at recruitment events and information sessions), registration forms and inquiry email.

Tufts may also receive information from the US government, including the Department of Education, A Better Chance, The Greenlight Fund, Hobsons, Inc., YouVisit, Parchment, Escip-SAFE for transcript delivery, other universities and colleges in connection with joint programs, Educational Testing Service (including for the Test of English as a Foreign Language (TOEFL)), the International English Language Testing System (IELTS), the International Baccalaureate (IB) program, the College English Test (CET); the Fulbright Foreign Student Program, the Institute of International Education, America-Mideast Educational and Training Services (AMIDEAST), and other similar organizations.

If applicable, Tufts also processes the information submitted in connection with your financial aid or scholarship application.

Additional Purposes and Lawful Bases for Processing EEA Personal Data and UK Personal Data

In addition to the purposes and lawful bases included above in this Section 3, Tufts may use or disclose the information provided for statutory, public interest and other purposes, including:

- To prevent or detect fraud.
- To comply with applicable laws and regulations and Tufts' policies, including but not limited to its non-discrimination policy.
- To help us to make reasonable accommodations for any disability, as requested by you.
- To allow for consideration of any future accommodation requirements.
- To offer and deliver university news, goods, services, and experiences to you.
- To help inform and support university and school planning and decision making.
- To provide information required by governmental and accrediting organizations.
- To conduct research and statistical analysis. No information that could identify you will be published in connection with this type of analysis.
- If you are admitted and enroll, facilitating your education (such as by sharing EEA Personal Data or UK Personal Data with registrars and others in order to enable your enrollment and participation in the course or program to which you have been admitted).

In addition to the purposes and lawful bases stated above in this Section 3, the University considers the processing of your personal information necessary to comply with a legal obligation (e.g. non-discrimination and professional licensing requirements), to establish, exercise or defend legal claims, and to perform tasks carried out in the public interest (e.g. admissions and educational services research).

4. Will my EEA Personal Data or UK Personal Data be transferred out of the EEA or the UK?

Your EEA Personal Data will be transferred out of the EEA to the USA and your UK Personal Data will be transferred out of the UK to the USA, which has different privacy laws than those of the EEA and the UK. Your EEA Personal Data may also be transferred to other countries and your UK Personal Data may also be transferred to other countries, which may have different privacy laws than those of the EEA and the UK. Tufts has adopted appropriate measures to protect your EEA Personal Data and UK Personal Data. In most cases, the transfer of your EEA Personal Data and UK Personal Data is necessary for the performance of a contract between you and Tufts, for the implementation of pre-contractual measures, for the conclusion or performance of a contract concluded in your interest, or for important reasons in the public interest. In limited circumstances, the transfer may be necessary for the establishment, exercise or defense of legal claims, to protect your vital interests, or as otherwise permitted by the GDPR or the UK DPA.

5. Will Tufts share my EEA Personal Data or UK Personal Data with others?

Your application and related materials will be shared with the appropriate faculty and staff at Tufts. Each school and program has developed its own practices for sharing your personal information based on its consideration of the type and sensitivity of the personal information, the purpose for which the information was provided or otherwise collected, the purpose for sharing the personal information,

and the safeguards used to protect the shared information. Accordingly, under certain, considered circumstances, and when relevant, your personal information may also be shared with:

- Parents, Spouses, and Guardians. In some cases, we may share your EEA Personal Data or UK Personal Data with a parent, spouse, or guardian if necessary, to properly complete the admissions process or in the event of an emergency.
- Service Providers. We may use third parties to support our operations and provide services. In such cases, we may share your information with Collaborating Parties and these other third parties.
- School Counselors and Administrators. For students enrolled in another school, we may share your information with your school counselors and administrators.
- University Affiliated Programs. We may share your information with third parties that are affiliated with the University for the purpose of contacting you about goods, services, or experiences that may be of interest to you.
- Research and Studies. We may share your information with third parties that study admissions or other topics related to higher education. We may also share your information with third parties that conduct research or develop products or services designed to improve education and other higher education functions.
- Required by Law. We may share your information with third parties to the extent we are required to do so by law, court order, or subpoena. In the case of international applicants, we may share your information with appropriate agencies including the U.S. Citizenship and Immigration Services in order to act as your sponsor for visa purposes.
- Emergency Circumstances. We may share your EEA Personal Data or UK Personal Data with a person you have designated as an emergency contact or with other third parties, if, in our sole judgment, such disclosure is necessary to protect your health, safety, or property or the health, safety, or property of any other person.
- Compelling Purpose. We may share your information in other cases when there is a compelling purpose regarding benefit to Tufts or members of our community.
- De-Identified and Aggregate Information. We may use and disclose information in de-identified or aggregate form without limitation.

6. How long will my EEA Personal Data or UK Personal Data be kept?

We store your EEA Personal Data and UK Personal Data for the duration of your participation in the course or program (and it may be used as part of our assessment of any future application you make for further studies at Tufts). Information about how long different types of information are retained by Tufts is published at [Records Retention Schedules](#) and is available from the school providing the course or the program in which you enroll or participate.

7. How is my EEA Personal Data and UK Personal Data used after the course or program?

Core records for persons participating in the courses and programs are generally retained indefinitely so that the details of your academic achievements can be confirmed and for statistical or historical research. See [Records Retention Schedules](#). Your contact and core personal details are passed to the Office of Alumni Relations so that you can be added to the alumni database. A statement for alumni and donors setting out how their EEA Personal Data and UK Personal Data is used by Tufts is published at [EEA and UK Privacy Statement for Alumni and Donors](#).

8. What rights do I have with respect to my EEA Personal Data and UK Personal Data?

The GDPR and the UK DPA provide you with several specific data protection rights with respect to your EEA Personal Data and UK Personal Data. These are generally described below. Further details, including how to submit a request, are published at [How to make a Subject Access Request](#). These rights are not absolute and each right is subject to limitations.

- The right of access. You have the right to confirmation of the EEA Personal Data or UK Personal Data that is processed about you by Tufts and to a copy of the information. Among the limitations for this right is that providing a copy will not adversely affect the rights of others.
- The right to correct. You have a right to have inaccurate EEA Personal Data and UK Personal Data rectified, or taking into account the purposes of the processing, completed if it is incomplete.
- The right to erasure (also known as the right to be forgotten). You have a right to have your EEA Personal Data and UK Personal Data erased in certain limited circumstances.
- The right to restrict processing and to object to use. You have the right to request the restriction or suppression of processing (use) of your EEA Personal Data and UK Personal Data. This right only applies in certain circumstances. If processing is restricted, Tufts would not be permitted to use the data without your consent, unless in connection with a legal claim, the protection of another person, or other exceptions. Tufts would be permitted to continue to store the information.
- The right to data portability. The right to data portability allows you to obtain an electronic copy of your EEA Personal Data and UK Personal Data to enable you to reuse that data for your own purposes across different services. This right allows you to move, copy or transfer EEA Personal Data and UK Personal Data easily from one IT environment to another. This right only applies to information you have provided to Tufts and depending on the context, applies to some of your information, but not to all of your information.

- The right to object. You have the right to object to the processing of your EEA Personal Data and UK Personal Data in certain circumstances, in the absence of a compelling reason for the continued processing.

9. Where can I go if I have questions?

If you have any questions about how your EEA Personal Data or UK Personal Data is used, or wish to exercise any of your rights, please consult the EEA and UK Privacy Statement and How to make a Subject Rights Request at [Privacy](#). If you need further assistance, please contact Tufts' Data Privacy Team at dataprivacy@tufts.edu, or the department or office providing the course or program.

If you are not happy with the way your EEA Personal Data is being handled, or with the response received from us, you have the right to lodge a complaint with the GDPR supervisory authority in the EEA country where you habitually reside, where you work, or where you believe an infringement of the GDPR occurred.

10. 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 January 1, 2021.