

# European Economic Area (EEA) and United Kingdom (UK) Privacy Statement for Students in Tufts-Sponsored Study Abroad Programs in the EEA and UK

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

The following statement has been prepared to provide notice to students whose EEA Personal Data or UK Personal Data is collected, used or otherwise processed by Tufts University, including its schools, for students applying to Tufts-sponsored study abroad programs in the EEA and UK, and for students while they are studying in those programs. 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 the 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, the EEA and UK Privacy Statement for Students, and the EEA and UK Privacy Statement for Prospective Students and Applicants found at [Privacy](#).

If you are a student in a study abroad program in the EEA or UK sponsored by another university or college, then you should contact the program's sponsor for information about their processing of any personal information subject to the GDPR or the UK DPA.

In addition to the information provided in this statement, students are encouraged to review the information about the Family Educational Rights and Privacy Act (FERPA) for their school. FERPA permits the disclosure of certain personal information classified by a school as "directory" information." See Tufts' [FERPA Policy](#). Privacy Blocks are available to students who wish to prevent the University from disclosing their directory information (in student directories and commencement programs, for example) by selecting the appropriate privacy settings through SIS.

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

For purposes of this statement for students, 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 the personal information to us in connection with being a participant in a Tufts-sponsored study abroad program, or your personal information is used or otherwise processed in the EEA in connection with the program.

For purposes of this statement for students, 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 being a student, or your personal information is used or otherwise processed in connection with a university established activity in the UK.

The GDPR and the UK DPA define "personal data" broadly. It means any information relating to an identified or identifiable living, natural person. The person the personal data is about is called the "data subject." 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.

## 2. How does this webpage relate to other information about data protection?

In addition to the information published here, when you use specific services and facilities offered by Tufts, you may be told about other uses of your EEA Personal Data and UK Personal Data. For example, there are separate statements for persons who use or engage with Tufts websites (see [Privacy Statement](#)), IT services (see [Use of Institutional Systems Policy](#)), the Counseling and Mental Health service (see [Confidentiality](#)), the Office of Equal Opportunity (see <http://oeo.tufts.edu/>), and the libraries (see [Tufts University Libraries Privacy Policy](#)).

## 3. Who will process my EEA Personal Data and UK Personal Data?

Your EEA Personal Data and UK Personal Data relating to your Tufts-sponsored study abroad program will be used, shared and

otherwise processed by staff, faculty, and other persons directly associated with the program, as well as other Tufts offices whose services support study abroad programs, including the Office of Global Operations, and the International Center.

The program will also share your EEA Personal Data and UK Personal Data with your school, and other Tufts departments as part of your educational record, and for a variety of other academic, educational, administrative, research and statistical purposes.

Additional information is provided about third parties that may receive EEA Personal Data or UK Personal Data collected as part of the program, including host families and other universities or colleges that may be affiliated with the Tufts-sponsored program.

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

The EEA Personal Data and the UK Personal Data that the study abroad program may keep a record of may include the EEA Personal Data and UK Personal Data: you provided in connection with your application to the study abroad program, including financial aid applications, if any (see [EEA and UK Privacy Statement for Prospective Students and Applicants](#)), included in records about your studies at Tufts, or included in records about your use of the academic and non-academic facilities and services in connection with the program.

Among the personal data included may be your name, home and local addresses, cell phone number, student identification number, Social Security number, passport number or other governmental identification numbers, date of birth, courses taken, fee payments, financial aid provided, information about your examinations, assessments and results, emergency and family contact information, travel itineraries, language competencies, health and wellness information, dietary requirements and preferences, hobbies, and photos.

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). 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 who have a legitimate interest in it for the purpose of carrying out their professional and contractual duties.

Tufts may process some personal data about you that is classified as "special category" EEA Personal Data or UK Personal Data, which requires additional protections. This includes information concerning your race, ethnicity, sexual orientation, religious beliefs or health/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. Access to, and the sharing of, this sensitive or "special category" EEA Personal Data and UK Personal Data are controlled very carefully.

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."

#### 5. What are the purpose and legal bases of the processing?

Tufts may process your EEA Personal Data and UK Personal Data for a range of contractual, statutory, or legitimate University interests, or for public interest purposes, including the following:

- To deliver and administer your education as part of the program, record the details of your studies (including any placements with external organizations), and determine/confirm your academic achievements (e.g. results, awards).
- To administer the financial aspects of your relationship with us and any funders.
- To deliver services to you (e.g. IT, accommodation, careers, housing, field trips).
- To enable your participation at events.
- To communicate effectively with you by mail, email and phone, including the distribution of relevant program information and updates, newsletters and brochures.
- To operate security, governance, disciplinary (including plagiarism and academic misconduct), complaint, audit and quality assurance processes and arrangements.

- To support your training, medical, safety, welfare requirements and your religious, spiritual, ethical, and cultural life.
- To compile statistics and conduct research for internal, statutory, regulatory and accreditation reporting purposes.
- To fulfil and monitor our legal obligations under equal opportunity, immigration and public safety laws and regulations, and for the establishment, exercise or defense of legal claims.
- To enable us to contact others in the event of an emergency.

We consider the processing of your EEA Personal Data and UK Personal Data for these purposes to be necessary for the performance of our contractual obligations with you (e.g. to manage your student experience and welfare while studying at a Tufts-sponsored program in the EEA or UK), or necessary for compliance with a legal obligation (e.g. equal opportunities monitoring), or necessary for the performance of tasks we carry out in the public interest (e.g. teaching and research), or necessary for the pursuit of the legitimate interests of Tufts as an educational and research institution or an external organization (e.g. to enable your access to external services). 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. We will not use your EEA Personal Data or UK Personal Data to carry out any wholly automated decision-making that affects you.

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

As described above, your EEA Personal Data and UK Personal Data may be shared with relevant Tufts staff, faculty and affiliates as required. In addition, it may be shared as permitted or required by law, on a considered and confidential basis, as appropriate, with a range of external organizations, including external examiners and auditors, and external individuals involved in relevant Tufts committees or procedures.

We may also share your EEA Personal Data and UK Personal Data as relevant with:

- *Affiliated Universities and Colleges.* If the Tufts-sponsored program is affiliated with a university or college in the EEA or UK, we will share EEA Personal Data and UK Personal Data, respectively, with the staff and faculty of that university or college as part of providing courses and other educational offerings and experiences to you.
- *Host Families.* If you will be residing with a host family, some of your EEA Personal Data or UK Personal Data will be shared with them, including your name, contact information, and other information that will be helpful for the family to provide you with a positive experience in their home.
- *Your Funders and Sponsors.* We may share your EEA Personal Data and UK Personal Data with organizations that may provide you funding or other financial sponsorship.
- *Parents, Spouses, and Guardians.* In some cases, we may share your EEA Personal Data and UK Personal Data with a parent, spouse, or guardian if necessary, including in the event of an emergency.
- *Service Providers.* We may use third parties to support our operations and provide services to our students. In such cases, we may share your EEA Personal Data and UK Personal Data with such third parties.
- *University Affiliated Programs.* We may share your EEA Personal Data and UK Personal Data 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. These may include the providers of any external/collaborative learning and training placements or fieldwork opportunities.
- *Student Organizations.* We may share your EEA Personal Data and UK Personal Data with student clubs and other organizations in order to facilitate your knowledge of those groups.
- *Research and Studies.* We may share your EEA Personal Data and UK Personal Data with third parties that study topics related to higher education. We may also share your EEA Personal Data and UK Personal Data with third parties that conduct research or develop products or services designed to improve higher education functions.
- *Higher Education Organizations.* We may share your EEA Personal Data and UK Personal Data with the National Student Clearinghouse and other relevant higher education organizations.
- *Required by Law and/or Governmental Authorities.* We may share your EEA Personal Data and UK Personal Data with third parties to the extent we are required to do so by law, court order, or subpoena. In the case of international students, we may share your EEA Personal Data and UK Personal Data with appropriate agencies including the U.S. Citizenship and Immigration Services in order to act as your sponsor for visa purposes. On occasion and when necessary, we may share your EEA Personal Data and UK Personal Data with local governmental authorities, including the police and other law enforcement bodies, and statutory regulatory bodies.
- *Emergency Circumstances.* We may share your EEA Personal Data and 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.

We will normally confirm details of your results and degrees awarded to external enquirers or organizations, and will provide references to third parties.

## 7. 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.

## 8. How are my EEA Personal Data and my UK Personal Data used after I graduate?

Core records for students are generally retained indefinitely for statistical or historical research and so that the details of your academic achievements can be confirmed. See [Records Retention Schedule](#).

## 9. How long will my EEA Personal Data and my UK Personal Data be kept?

We store your EEA Personal Data and UK Personal Data for the duration of your studies (and it may be used as part of our assessment of any future application you make for further studies at Tufts). Generally, student records for matriculated students are retained permanently. Information about how long different types of information are retained by Tufts is published at [Records Retention Schedule](#).

## 10. What rights do I have with respect to my EEA Personal Data and my 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.

## 11. 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 Access Request](#). If you need further assistance, please contact Tufts' Data Privacy Team at [dataprivacy@tufts.edu](mailto:dataprivacy@tufts.edu), or your prospective school, as appropriate.

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 or where you believe an infringement of the GDPR occurred.

## 12. 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.