

European Economic Area (EEA) Privacy Statement for Alumni and Donors

The following Statement has been prepared to provide notice to alumni and donors whose EEA Personal Data is collected, used or otherwise processed by Tufts University. This statement provides notice under the General Data Protection Regulation (GDPR) for the European Economic Area (EEA). The GDPR became effective on May 25, 2018. The GDPR is a regulation adopted for the EEA that governs the use and processing of personal information. Tufts is committed to processing your EEA Personal Data in compliance with the GDPR and has prepared this statement to provide you with information about your rights under the GDPR.

This Statement discloses the privacy practices for the EEA Personal Data of Tufts alumni and donors. Please read these terms together with the [Tufts University Privacy Statement](#), the [EEA Privacy Statement](#), 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 EEA 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 and donors 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. What is "EEA Personal Data"?

For purposes of this statement for alumni and donors, 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 an alumnus or donor.

The GDPR defines "personal data" broadly. It includes "any information relating to an identified or identifiable 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." GDPR. Article 4(1).

The GDPR often uses the term "processing," which includes any way of working with personal data, from collecting to using to sharing to disposing of it. GDPR. Article 4(2).

For example, if you provide personal information to Tufts when you are physically present in the EEA, that personal information may be EEA Personal Data.

2. EEA Personal Data held by Tufts

We may hold information relating to you from a number of sources. A significant proportion of the EEA Personal Data we hold on alumni and donors 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 EEA Personal Data within the scope of the GDPR.

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 or donors
- 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 EEA Personal Data about you that is classified as "special category," EEA Personal Data, which requires additional protections. This may include 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" EEA Personal Data are controlled very carefully.

3. How your EEA Personal Data is used by Tufts

We may use automated or manual analyses to link EEA 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 EEA 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 and donor groups)
- wealth analysis and research in order to improve our understanding of our alumni and donors, 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 and donor data with companies and institutions that desire to offer services and benefits to Tufts alumni and donors at a discounted rate. Any third parties who receive alumni and donor 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 and donors.

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.

4. The lawful basis under the GDPR for processing your EEA Personal Data

The lawful basis for processing your EEA Personal Data under the GDPR 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 EEA Personal Data securely and minimize its use.

5. How we protect your EEA Personal Data

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

We do not sell your EEA Personal Data to third parties under any circumstances, or permit third parties to sell the EEA 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 or donor data for any commercial or business marketing.

The above types of sharing may involve the transfer of your EEA Personal Data outside the European Economic Area. Such transfers usually are necessary (i) in order to meet our contractual obligations with you or contractual obligations with others that are in your interest, (ii) for the establishment, exercise or defense of legal claims, (iii) to protect your vital interest, or (iv) as otherwise permitted by the GDPR. The transfers are carried out with confidentiality and privacy safeguards in place to protect your EEA Personal Data.

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

We will retain your EEA 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](#).

7. What rights do I have with respect to my EEA Personal Data?

The GDPR provides you with several specific data protection rights with respect to your EEA 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 under the GDPR](#).

- *The right of access.* You have the right to confirmation of the EEA Personal Data that is processed about you by Tufts and to a copy of the information. This right is subject to limitations, including that providing a copy will not adversely affect the rights of others.
- *The right to correct.* The GDPR includes a right for you to have inaccurate EEA 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).* The GDPR includes a right for individuals to have their EEA Personal Data erased in certain limited circumstances. This right is not absolute.
- *The right to restrict processing.* You have the right to request the restriction or suppression of your EEA Personal Data. This is not an absolute right and 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 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 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.* The GDPR gives individuals the right to object to the processing of their personal data in certain circumstances, in the absence of a compelling reason for the continued processing.

8. Where can I go if I have questions?

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

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.

9. 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 on May 25, 2018.