

## European Economic Area (EEA) Privacy Statement for Prospective Students and Applicants

This statement provides information about the use of EEA Personal Data provided by prospective students and applicants for admission to the schools' programs and for financial aid for those programs. 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 should be read together with the [EEA Privacy Statement](#).

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

For purposes of this statement for prospective students and applicants, 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 our academic programs and/or applying for admission to, or financial aid for, those programs. (In some cases, for purposes of other of Tufts EEA Privacy Statements, EEA Personal Data includes personal information Tufts collects or otherwise processes in the context of our established study abroad programs in the EEA.)

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

### 2. Who will process my EEA Personal Data?

The information provided here applies to the collection, use, sharing, disclosure and other processing of your EEA Personal Data by Tufts University and its schools as part of the admissions and financial aid process. The schools assessing your application for admission and for financial aid may provide you with additional statements about how they will collect, use, share, disclose and otherwise process your EEA Personal Data as you progress through the admissions and financial aid process.

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

*For prospective students and applicants to undergraduate and graduate degree and certificate programs of the School of Arts and Sciences, the School of Engineering, and the School of the Museum of Fine Arts at Tufts:*

Tufts will use the details provided, including through the College Board, on your Common Application, the Coalition Application, or the Questbridge application (undergraduate programs) or the graduate program application, supplementary application materials, together with the supporting documents requested and additional details provided by the 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, Escript-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 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 application. For certain degree programs, we will also conduct background screening checks for safeguarding purposes.

Additional information about the collection, use, combining and other processing of your EEA Personal Data is available by contacting the Admissions and Financial Aid offices of each school.

For more information about the specific types of personal information we collect and why we do so, please see the following Section 4.

*For prospective students and applicants to the School of Medicine, Sackler School of Graduate Biomedical Sciences, School of Dental Medicine, Gerald J. and Dorothy R. Friedman School of Nutrition Science and Policy, the Cummings School of Veterinary Medicine and The Fletcher School of Law and Diplomacy:*

Tufts will use the details provided, including on your application, submitted to us by you, a third party application service, such as the American Medical College Application Service (AMCAS), the American Dental Education Association Associated American Dental Schools Application Service (ADEA AADSAS), and the Veterinary Medical School Application Service (VMCAS), or otherwise, supplementary application materials, together with the supporting documents requested and additional details provided by the persons submitting letters of recommendation or recorded following an interview, if one is conducted. If applicable, some Tufts schools also process the financial information submitted in connection with your financial aid application. For certain degree programs, the school may also conduct background screening checks for safeguarding purposes and to make sure that its students are available for professional rotations and licensure.

Tufts may also receive information from the US government, including the Department of Education, other universities and colleges in connection with joint programs, Educational Testing Service (including for the Test of English as a Foreign Language (TOEFL)), the College Board, the Association of Professional Schools of International Affairs (APSIA), the International English Language Testing System (IELTS), and other similar organizations.

Additional information about the collection, use, combining and other processing of your EEA Personal Data is available by contacting the Admissions and Financial Aid offices of each school.

For more information about the specific types of personal information we collect and why we do so, please see the following Section 4.

*All Schools – Sensitive Personal Data*

In addition to the personal information referred to above, Tufts may process some EEA Personal Data about you that is classified as “special category” EEA Personal Data, which requires additional protections under the GDPR. This includes information you may provide concerning your race, ethnicity, sexual orientation, 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 and your fitness to practice in certain regulated professions. Access to, and the sharing of, this sensitive or “special category” EEA Personal Data are managed very carefully.

#### 4. What is the purpose and lawful basis of the processing?

Tufts will use your EEA Personal Data provided on your admission application, the financial aid application, and the other information referred to above for the purposes of answering questions you may have, identifying you, processing your application, verifying the information provided, assessing your candidacy for admission to the programs to which you applied and deciding whether to offer you admission to those programs, assessing your eligibility for financial aid and determining what financial aid will be offered to you, and communicating to you those outcomes. The following table provides additional information about specific types of personal information we collect and otherwise process, the reasons we do so, and which legal bases under the GDPR are applicable. This table includes types of personal information you may be required to provide, as well as information that may be optional to provide. We require you to provide your personal information (except for questions marked as optional) during the admissions and financial aid processes in order to assess your candidacy properly. The following table also includes information that may be collected from other persons or organizations.

Admissions and financial aid decisions are not automated.

The information provided below includes information that our schools may receive, including in some cases information that may be provided voluntarily that is not required for a complete application. However, the information used by a particular school in its admission and financial aid processes may not include all of the information listed below.

<b>Category of Personal Data (including Optional and Required Personal Data)</b>	<b>Purposes of Collecting and other Processing</b>	<b>GDPR Legal Bases for Collecting and other Processing</b>
<b>Contact Information</b> including your name, home or school address, email address, phone numbers, and emergency contact information	To respond to requests for information from you and communicate your application status and decision; to establish a record for your admissions and financial aid application processes; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Our legitimate interests  Your consent, if applicable

<p><b>Identifying Information</b> 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 determine if a visa is required for program participation; to evaluate eligibility for financial aid, including prior financial aid for education; to establish a Bursar's account; for a criminal background check, if enroll; statistical purposes</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Our legitimate interests</p> <p>For compliance with a legal obligation</p> <p>Your consent, if applicable</p>
<p><b>Demographic Information</b> including race, ethnicity, gender, including gender preference, sexual orientation, age, marital status, health and disability, photo, dietary preferences, and other personal history and 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; in order to provide care, help or suitable adjustments; for required regulatory reporting; to evaluate your eligibility for admission; 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; event planning, including during orientation; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Our legitimate interests</p> <p>For compliance with a legal obligation</p> <p>Your consent, if applicable</p>
<p><b>Education History</b> including your prior schools, transcripts, school activities, scholarly work and disciplinary records</p>	<p>To evaluate your eligibility for admission; to determine what schools you previously attended so that we may verify we have complete information; to evaluate academic credits that may transfer to our school; to evaluate eligibility for merit and endowed scholarships with specific requirements; to respond to records requests; to evaluate and assess the type of violation committed and how it may impact our university community</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Our legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Testing History</b> including standardized testing and corresponding identity verification documentation</p>	<p>To evaluate your eligibility for admission; to evaluate eligibility for merit and endowed scholarships with specific requirements; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Our legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Personal History</b> including interests, extracurricular activities, references and recommendations and other personal information you may choose to volunteer about yourself, your family members, or other persons, including in your application or your essay, 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 respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Our legitimate interests</p> <p>Your consent, if applicable</p>

<b>Employment and Professional History and Criminal Record</b> including resume or CV, job title, location, and work experience, professional certifications, and your self-reported and publicly available criminal record	To evaluate your eligibility for admission; to evaluate your ability to comply with professional training and licensure requirements; to evaluate eligibility for merit and endowed scholarships with specific requirements; to respond to records requests; to evaluate and assess the type of violation committed and how it may impact our university community	To process transactions requested by you and meet our contractual obligations  Our legitimate interests  For compliance with a legal obligation  Your consent, if applicable
<b>Personal Financial Information</b> 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	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  Our legitimate interests  For compliance with a legal obligation  Your consent, if applicable
<b>Family Financial Information</b> 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  Our legitimate interests  Your consent, if applicable
<b>Payment Information</b> depending on your means of payment, your payment card number or your bank and bank account number	To receive payment of application fees and refunds, if applicable	To process transactions requested by you and meet our contractual obligations  Our legitimate interests  Your consent, if applicable

Additionally, 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 with registrars and others in order to enable your enrollment and participation in the school to which you have been admitted).

In addition to the purposes stated above, the University considers the processing of your personal information for the above purposes 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 research).

Your EEA Personal Data will be transferred out of the EEA to the USA, which has different privacy laws than those of the EEA. Tufts has adopted appropriate measures to protect your EEA Personal Data. In most cases, the transfer of your EEA 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 or to protect your vital interests.

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

Your application and related materials will be shared with the appropriate faculty and staff at Tufts. Each school 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 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 to our prospective, admitted or enrolled students. In such cases, we may share your information with these third parties.
- *School Counselors and Administrators.* 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 admissions 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 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 about our applicants in de-identified or aggregate form without limitation.

## 6. How is my EEA Personal Data used if I am admitted and decide to enroll?

If you are accepted and decide to enroll, we will use your personal information for the purposes described at “How is my EEA Personal Data used?” in the [EEA Privacy Statement for Students](#), as amended from time to time. Further information about this will be provided in your offer of admission, and if applicable, your financial aid decision.

If you are accepted and decide to enroll, Tufts will also provide data about you to the National Student Clearinghouse and other external agencies and funding bodies, as required.

## 7. How long will my EEA Personal Data be kept?

We will store your EEA Personal Data for as long as necessary to complete the application process. Some schools store applicant information permanently. If you are admitted, your personal information will normally be kept for at least one year or longer after the completion of the application process, depending on the policy of the school to which you applied. If you are admitted and decide to enroll, your personal information will be kept as part of your student record 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). Details about how long different types of information are retained by Tufts is published at [Records Retention Schedule](#) and is available from the school to which you applied. Additional information about how long student information may be retained is available in the [EEA Privacy Statement for Students](#).

## 8. 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 Rights 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.

## 9. 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 Rights Request under the GDPR at [Privacy](#). 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, 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 on June 11, 2019.