

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 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.

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 (www.tufts.edu) 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 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.

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 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, 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.

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.

All Schools.

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 controlled 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.

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 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.

The University considers the processing of your personal information for the above purposes necessary to create a contractual relationship with you (e.g. to assess your application for admission), to comply with a legal obligation (e.g. non-discrimination), or to perform tasks carried out in the public interest (e.g. admissions research), and/or for the purposes of Tufts' legitimate interests, including providing educational and academic programs. 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. Admissions and financial aid decisions are not automated.

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, 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 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 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.

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 Access Request under the GDPR](#). If you need further assistance, please contact Tufts' Data Privacy Team at 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 May 25, 2018.