

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

The following statement has been prepared to provide notice to students whose EEA 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 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). 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](#) and the [EEA Privacy Statement for Prospective Students and Applicants](#).

If you are a student in a study abroad program in the EEA 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.

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 [School of Arts and Sciences and School of Engineering FERPA Notice](#); [The Fletcher School FERPA Notice](#); [Cummings School of Veterinary Medicine FERPA Notice](#); [Friedman School of Nutrition Science and Policy FERPA Notice](#); [School of Dental Medicine FERPA Notice](#); [Sackler School of Graduate Biomedical Sciences FERPA Notice](#); and [School of Medicine FERPA Notice](#). 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 (<http://go.tufts.edu/sis>).

### 1. What is "EEA 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.

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).

### 3. 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. 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](#)).

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

Your EEA 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 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 collected as part of the program, including host families and other universities or colleges that may be affiliated with the Tufts-sponsored program.

### 5. What EEA Personal Data will be processed?

The EEA Personal Data that the study abroad program may keep a record of may include the EEA Personal Data:

- you provided in connection with your application to the study abroad program, including financial aid applications, if any (see [EEA Privacy Statement for Prospective Students and Applicants](#)),
- included in records about your studies at Tufts,
- included in records about your use of the academic and non-academic facilities and services in connection with the program.

Among the EEA 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 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 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 EEA Personal Data about you that is classified as "special category" EEA 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 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."

## 6. What is the purpose and legal basis of the processing of EEA Personal Data?

Tufts may process your EEA 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 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 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, we will collect it at the appropriate time. We will not use your EEA Personal Data to carry out any wholly automated decision-making that affects you.

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

As described above, your EEA 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 as relevant with:

- **Affiliated Universities and Colleges.** If the Tufts-sponsored program is affiliated with a university or college in the EEA, we will share EEA Personal Data 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 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 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 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 with such third parties.
- **University Affiliated Programs.** We may share your EEA 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 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 with third parties that study topics related to higher education. We may also share your EEA 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 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 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 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 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 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.

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.

## 8. How is my EEA 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 be kept?

We store your EEA 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?

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.

## 11. 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](mailto: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 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 on May 25, 2018.