

## Global Privacy Statement for Personal Data

This statement provides additional information about our use and processing of your personal data. Some jurisdictions have adopted laws and regulations that include notice and other requirements that may apply to your personal data (together, the Privacy Laws). Among those Privacy Laws are the General Data Protection Regulation for the European Economic Area (EEA) (regulation (EU) 2016/679 of the European Parliament) (the EEA GDPR) and the United Kingdom General Data Protection Regulation, as tailored by the Data Protection Act 2018 of the UK (the UK GDPR). In addition to this general notice, other notices are provided that apply to the personal data of [Prospective Students and Applicants](#); [Students](#); [Students in Tufts-sponsored Study Abroad Programs](#); [Job Applicants, Faculty, Staff, Consultants and Other Persons Providing Services](#); [Alumni, Donors and other Tufts Supporters](#); [Research Participants](#); and for [Online Education and Non-Degree Educational Program Participants](#).

This Notice should be read together with Tufts' [Privacy Statement](#).

### 1. Why have I been directed to this webpage?

The general information published on this page is intended to supplement specific information that you may have already been given in connection with your engagement with a particular service, facility, event or initiative run by Tufts. You may have been directed here, for example, because you are accessing an optional staff or student service or using a Tufts facility, or because you are using a particular website or online resource, or because you have signed up to attend an event aimed at prospective students or members of the public. The information below is the same for many such situations, and we thought it would be helpful to have it in one place.

### 2. What is “personal data” and what does “processing” mean?

In this notice and in the other specific notices, we use the broad meaning of personal data used in the EEA GDPR and the UK GDPR, which define “personal data” as any information relating to an identified or identifiable natural person. Other Privacy Laws may include other definitions of personal information or personal data, which may be narrower than this definition or may include very specific types of information.

Many of the Privacy Laws use the word “processing.” “Processing” simply means any way of working with personal data, from collecting it to using it to sharing it to disposing of it.

### 3. What are the purposes and lawful bases for processing your personal data?

Tufts may collect, use and otherwise process personal data about you for several different purposes and legal bases, including:

- We need it to perform a contract with you, such as to provide you services.
- It satisfies a legitimate interest, such as to promote and provide goods and services to you and to protect our legal rights and interests. When our purpose is based on our legitimate interest, we consider whether that interest is overridden by your data protection interests.
- You give us consent to do so for a specific purpose.
- We need to process your data to comply with a legal obligation.
- We need to process your data in connection with your or another person’s vital interest.
- We need to process your data in connection with the public interest.
- We have another permitted legal basis.

If you have consented to our use of information about you for a specific purpose under the EEA GDPR or the UK GDPR, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. If you have consented to our use of information about you for a specific purpose under another of the Privacy Laws, then that Privacy Law may also allow you to change your mind at any time, but this will not affect any processing that has already taken place.

Unless you are told otherwise, there is no requirement to supply us with any of your personal data. It is Tufts' policy to not use personal data to carry out any automated decision-making that affects you without an appropriate legal basis as required by the applicable Privacy Law.

#### **Specific information for Services**

Tufts will process your personal data in connection with tufts.edu and other Tufts University websites (together, a “Site” or “Sites”) that have pointed you to this page, as well as mobile apps and other digital properties (together, a “Service” or the “Services”), for a variety of service- and business-related purposes, including for analyzing and improving website performance; email and other communications; processing you have requested; third-party services; and security and legal requirements.

The use of your personal data in the manner described above and elsewhere in the Privacy Statement are necessary for the legitimate interests of the University in operating and improving its Services, analyzing their use, and ensuring their security. The Services collect limited personal data and we use it in ways that are compatible with your individual rights and freedoms. Where you enter your personal data into an online form on or in connection with any of our Services for any specified purpose, you will be told about the use we will make of that information (e.g., to send you newsletters or to enable your attendance at an event).

## 4.If I am outside of the United States, will my personal data be transferred out of the country where I am located or reside?

Your personal data will be transferred out of the country where you are when it is collected to the USA, which has different privacy laws than those of your country. Your personal data may also be transferred to countries other than the US, which may have different privacy laws than those of your country. Tufts has adopted appropriate measures to protect your personal data. The transfer of your personal data may be 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 EEA GDPR, the UK GDPR, or other applicable Privacy Laws.

## 5.Will Tufts share my personal data with others?

We will use reasonable measures to ensure that your personal data are only transferred to third parties who also maintain at least the standard of protection required under the EEA GDPR, the UK GDPR, or other Privacy Laws, as applicable.

## 6.How long will my personal data be kept?

Information about how long different types of information are retained by Tufts is published at [Records Retention Schedules](#).

## 7.What rights do I have with respect to my personal data?

The Privacy Laws of different countries provide specific data protection rights. It is Tufts' intention to comply with the data protection rights that apply to its processing of personal data under the different Privacy Laws.

### *Rights Provided by the EEA GDPR and the UK GDPR*

The EEA GDPR and the UK GDPR provide individuals with several specific data protection rights with respect to their personal data. These rights require a particular type of connection to the countries that are part of the EEA or the UK. These rights apply when Tufts processes your personal data:

- As part of Tufts acting in an established way in the EEA or UK, respectively,
- In connection with Tufts offering goods or services to you when you are physically in the EEA or the UK, or
- When the processing is related to any monitoring of your behavior when you are physically in the EEA or UK.

The rights provided by the EEA GDPR and the UK GDPR 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 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 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 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 your 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 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 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 personal data in certain circumstances, in the absence of a compelling reason for the continued processing.

### *Rights Provided under other Privacy Laws*

As mentioned above, it is Tufts' intention to comply with the data protection rights that apply to its processing of personal data under the different Privacy Laws. If you wish to exercise a data protection right under one of the Privacy Laws other than the EEA GDPR and the UK GDPR, then you can find additional information at [How to Make a Subject Access Request](#).

## 8.Where can I go if I have questions?

If you have any questions about how your personal data is used, or wish to exercise any of your rights with respect to your personal data, please

see [How to make a Subject Access Request](#) or contact Tufts' Data Privacy Team at [dataprivacy@tufts.edu](mailto:dataprivacy@tufts.edu).

If you are not happy with the way your personal data is being handled, or with the response received from us, then the EEA GDPR and the UK GDPR provide you the right to lodge a complaint with the GDPR supervisory authority or commissioner in the country where you habitually reside, where you work, or where you believe an infringement of the GDPR occurred.

You may similar rights under other Privacy Laws.

## 9.Changes to this Privacy Statement

Tufts University reserves the right to change, modify, or otherwise amend this notice at its sole discretion and at any time as it deems circumstances warrant. Any such changes will be posted on this page.

This notice was last updated effective on July 9, 2021.