

## Privacy Statement

This Privacy Statement discloses the privacy practices for 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"). This privacy statement covers all tufts.edu websites, apps and other digital properties unless a particular Service indicates otherwise. Services may have additional privacy policy or policies. Please read these terms with the Terms & Conditions of Use.

The University places a high value on privacy and recognizes its critical importance in an academic setting. The University affirms its obligation to comply with all applicable privacy laws and regulations.

If you leave a Service and visit a website, app or other digital property operated by a third party, Tufts University cannot be held responsible for the protection and privacy of any information that you provide while visiting such third-party services. Accordingly, please exercise caution and review the privacy statement applicable to the website, app or other digital property in question.

To the extent permissible under applicable law, by using and/or participating in these Services, you signify that you have read these terms and agree to be bound by and comply with them. If you do not agree to be bound by these terms, please promptly exit all Services.

An additional Privacy Statement (The Global Privacy Statement for Personal Data) is provided that discloses additional information with respect to personal data protected under 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). Various other notices are published in relation to the use of the personal data protected under the Privacy Laws 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 [Online Education and Non-Degree Educational Program Participants](#).

### Information You May Provide Directly

The following types of information may be stored and processed by Tufts if provided by you through our Services:

- Your contact details including address, email address and phone number
- Biographical information consisting of your name, title, birth date, age, and gender
- Information about your time at Tufts University
- Your professional activities
- Current interests and preferences
- Records of communications sent to you by Tufts University or received from you
- Attendance at Tufts University events

The above categories of information are only collected through the Services if you provide them.

There are a number of circumstances in which you may choose to provide us with your personal information. The following lists the most common ways in which we may collect your personal information:

- When you sign up to receive e-mail newsletters from us
- When you register for an account on a Service (e.g. Taleo or Interfolio for job applicants)
- When you participate in surveys, panels, or research
- When you register for or participate in programs, activities, initiatives, and events
- When you request information or assistance
- In conjunction with processing your application for admission or employment
- When you participate with social media accounts involving Tufts programs
- When you participate in communities, chat rooms, and other interactive services
- In conjunction with any verification of your account information
- In conjunction with investigations into any activity that may violate the law or the Service's terms and conditions
- When you communicate with us through a Service
- When you provide user-generated content on any Service that permits it
- In conjunction with any other activity on a Service where you knowingly volunteer personal information.

When you interact with any Tufts page or account on a social media platform, such as Facebook, Twitter, LinkedIn, YouTube, Vimeo, or Instagram, or when you use your social media account or credentials to log in to a Service, we may also collect the personal information that you make available to us on that page or through that account, including your username, account ID or "handle."

It is Tufts' policy to hold all personal information you supply in accordance with applicable data protection and privacy law.

## Information Gathered About You or Your Devices

We collect information when you access one of the Services and when you subscribe to our email services.

### **Device Information**

We may collect information about the computer, mobile device or other device you use to access the Services such as IP address, geolocation information, unique device identifiers, browser type, browser language or other information of this nature. We use this information in an aggregate fashion to track access to the Services.

*IP Address.* Your IP address is automatically assigned to your device by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for several purposes, such as security, calculating usage levels, and diagnosing server problems. We also use your IP address to administer our Services by identifying (1) which parts of a Service are most heavily used, (2) where our users come from (i.e., a referring sign or a search engine, etc.), and (3) which portion of our audience comes from within or outside the Tufts network. We may also derive your approximate location from your IP address. We do not link IP addresses to anything personally identifiable unless we are required to do so under applicable law or court order or authorized to do so under our policies.

*Physical Location.* We may use your device's physical location to provide you with personalized location-based services and content. We may also share your device's physical location with our service providers to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you do, we and/or our service providers may not be able to provide you with the applicable personalized services and content.

### **Use of Cookies**

Cookies are small files that are stored on your device and are used to collect and store information. This may include: which pages you see; how long you stay; what you click on our pages; if you visit the website again; and which country and city you are browsing from.

*Types of Cookies.* A *session cookie* is temporary, linking the actions of a user during any given browser session. When the browser is closed, the cookie is deleted. A *permanent cookie*, also known as a *persistent cookie*, is stored for a specific period of time and activates each time the user visits the website that created the cookie. A *third-party cookie* is placed by a domain other than that of the website the user is visiting. Further general information about cookies and how they work is available at [www.allaboutcookies.org](http://www.allaboutcookies.org).

*Why we use Cookies.* We use session, permanent and third-party cookies for security purposes, to display information more effectively, to understand and save your preferences for future visits and to compile aggregate data about site traffic and site interaction, so that we can offer better site experiences and tools in the future. Cookies further allow us to select which of our programs, initiatives, offerings and services are most likely to appeal to you and to display them while you are on the Services.

We may contract with selected third parties to place cookies through the Services to provide us with better insights into the use of the Services or user demographics or to provide relevant advertising to you. These third parties may collect information about a user's online activities over time and across different websites when they use our Services. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

Some third-party cookies may originate from websites such as Facebook, Twitter, Google+, LinkedIn, Tumblr, YouTube, Instagram, Pinterest or other social media services. Since the cookie policies of these sites change over time, you should determine their policies by visiting the privacy policy pages of these sites directly.

### **Use of Technology to Track Users of Services**

*Google Analytics.* One or more of our Services may also use a third-party service, Google Analytics, to track website statistics. Google Analytics uses cookies and other technologies to track visitor interactions and collects the IP address of website visitors in order to provide us a sense of where our visitors come from. This service may also collect demographic and information regarding the use of other websites, apps and online resources. Google Analytics collects information anonymously and reports website trends without identifying individual visitors or reporting IP addresses to us.

We use the information collected to understand how our visitors are using the website and make improvements for a better online experience. We do not use Google Analytics to track or collect personal information (name, email address, billing information or other data that can be reasonably linked to such information) and we do not associate personal information with web analytics information.

To see the full Google Analytics privacy policy and learn more about its privacy practices, please see [Google Privacy Policy](http://www.google.com/policies/privacy/partners/), [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/), and [Google Analytics: Safeguarding Your Data](http://www.google.com/policies/privacy/partners/). You can opt out of the services by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

*Pixel Tags.* One or more of our Services may use pixel tags (also known as web beacons, tags or clear GIFs) that embed graphic files in our Services. These graphic files contain a unique identifier that enables us to recognize when someone has visited our Services, or, in the case of web beacons, opened an email that we have sent them.

These small data files or graphic files serve a variety of functions. In some instances, they may be necessary to deliver a particular service. Even when they are not essential to the delivery of a service, they may provide information that enables us to improve the performance

and functionality of our services and the effectiveness of our marketing campaigns. They may also enable us to customize our services and provide advertising messages that are more relevant to you and your interests.

*Adobe Flash Technology.* We may use Flash Local Shared Objects (Flash LSOs) and other similar technologies to, among other things, collect and store information about your use of the Services.

### **Adjusting Cookie Settings**

You can change your cookie settings by reviewing your internet browser's cookie options. Most browsers allow you to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. The links below to popular browsers may help you understand your cookie options better. Typically, such information can be found under the browser's 'Help', 'Preferences' or 'Options' menus. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. We do not currently respond to browser do-not-track request signals.

- Cookie settings in Chrome
- Cookie settings in Firefox
- Cookie settings in Internet Explorer
- Cookie settings in Safari – iOS
- Cookie settings in Safari – macOS

*Blocking Cookies.* Should you choose to decline or block cookies by adjusting your browser settings, including cookies essential to the Services, please note that all or parts of our Services may not be functional or accessible to you. Our Services will issue cookies as soon as you visit the Services, unless your browser cookie settings are adjusted to prevent such an occurrence.

*Interest-Based Advertisements.* Some of our Services engage in online interest-based advertising to enhance your experience and show you advertisements that might interest you. Like many organizations, we and our advertising partners display tailored interest-based advertising on the Services and on third-party platforms using information you make available to us when you interact with our Services. Interest-based ads, also sometimes referred to as personalized or targeted ads, are displayed to you based on information from activities such as searching on our Services or visiting other websites, apps or online services that contain our content or ads. We do this using a variety of digital marketing networks and ad exchanges, and we use a range of advertising technologies like mobile identifiers, cookies, and pixel tags.

To learn more about interest-based ads or to opt-out of receiving interest based ads, please visit <http://optout.aboutads.info>, or [www.youronlinechoices.eu](http://www.youronlinechoices.eu), or [Network Advertising Initiative Opt-Out Page](#). Google provides information on [Blocking Certain Ads](#) and on how to [Control the Ads You See](#). Please note that if you opt out of interest-based advertising, you will still see advertisements – they will just not be tailored to your interests. Also, note that deleting browser cookies can remove the cookie preferences you have made, so you may need to opt-out again in the future.

## **Email Terms**

When you give us your email address, we may use it to respond to inquiries, requests or questions, or to communicate information about the University or its activities. If you do not wish to receive communications from Tufts, please click on the unsubscribe link in the body of the message.

Depending on the context in which you submitted your contact information, your data may be accessible to Tufts and its schools, departments, institutes, centers, and divisions connected to Tufts. It is used and processed for a full range of communications and programs involving academic and administrative departments. These include the following communications and marketing activities (by mail, email, text message and telephone):

- Sending University publications
- Promoting our programs, events and other services
- Notifying you of upcoming events
- Promoting opportunities

Tools may be used to help us improve the effectiveness of our communications with you, including tracking whether the emails we send are opened and which links are clicked within a message. Lastly, we use data to undertake analysis projects to ensure only effective and relevant communications are sent to you.

If you send us email messages, you should be aware that information disclosed in email may not be secure or encrypted and thus may be available to others. We suggest that you exercise caution when deciding to disclose any personal or confidential information in email.

## **Information We Collect from Others**

In addition to the information described under Information Gathered About You or Your Devices above, we may obtain personal information about you from third parties.

### **Partners and Service Providers**

We use partners and service providers, such as application facilitators, payment processors and analytics providers, to perform services on our behalf. Some of these partners have access to personal information about you that we may not otherwise have (for example, if you sign up directly with that provider) and may share some or all of this information with us. We use this information to administer our services and conduct marketing and advertising campaigns, as well as to process transactions that you request.

## **Single Sign-On**

Some of our Services allow you to register and log in to them through a third-party platform. When you choose to login to one of our Services through a third-party platform, you allow us to access and collect any information from your third-party platform account permitted under the settings and privacy policy of that platform. We use this information to deliver this functionality and the Services to you.

## **Supplemental Information**

We may receive additional personal information from third-party sources, such as credit reference agencies and public or private databases, or companies or institutions that may sponsor or facilitate your participation in one of our programs, which we may append to existing personal information, such as email address verification. We may use this supplemental information to process transactions that you request and to prevent fraud, deliver relevant offers and advertising to you, and to improve our operations, services and our advertising and marketing campaigns.

## **How Do We Use Your Information?**

We may use your personal information in order to:

- Conduct our operations and administer our educational and other services
- Manage your accounts with us
- Contact you to respond to your requests or inquiries
- Process and complete your transactions including, as applicable, course registration, order confirmation, enrollment in academic groups or other programs, processing payments for online purchases and course registration, and delivering products or services
- Administer fellowships, grants and other programs in support of individual study and research projects
- Provide you with newsletters, articles, service alerts or announcements, event invitations, and other information that we believe may be of interest to you or you have requested
- Provide you with promotional information, offers, and other information that are personally tailored to your interests
- Conduct research, surveys, and similar inquiries to help us understand trends and needs of our users
- Perform marketing, promotions and advertising, either directly or through third-parties, which activities may include interest-based advertising, targeted advertising and online behavioral advertising in order to increase the likelihood that the content would be of interest to you
- Request gifts and donations
- Prevent, investigate, and take action regarding, or provide notice of fraud, unlawful or criminal activity, unauthorized access to or use of personal information, our website or data systems or other misconduct
- Enforce our Privacy Statements and Terms of Use, and other agreements
- Meet the requirements of our accreditors
- Meet our legal obligations
- Send you text messages or push notifications when you sign up for one of our messaging programs, which messages may be sent by automated means
- Respond to subpoenas, court orders, or other legal process
- Protect the health, safety, rights or property of you, us or others, including by providing a safety announcement

## **Will Tufts Share My Information with Others?**

We may share your personal information within our community of schools, centers, and other Tufts units and affiliates. User information may also be shared with third-party partners to the extent necessary for such third parties to provide services to us or to users of our services or provide and improve our Services or other communications to users. Any third parties who receive user information for this purpose are prohibited from using or sharing user information for any purpose other than providing services to Tufts or to users.

We may also provide your information to third parties in circumstances where we believe that doing so is necessary or appropriate to satisfy any applicable law, regulation, legal process or governmental request; to enforce our rights, to detect, prevent or otherwise address fraud, security or technical issues; or to protect the rights, property or safety of us, our users or others. Additional information about how we may share your information is provided below.

### **COVID-19 Tracing Apps**

With respect to any COVID-19 tracing apps, your mobile telephone number, opt-in data and SMS messaging will not be shared with any affiliated or unaffiliated third parties or otherwise sold, transferred, disclosed, or disseminated to any third party, except as necessary to perform services on our behalf in connection with the tracing app, or as required by law. In no event shall affiliated or unaffiliated third parties be permitted to use such information for marketing purposes.

### **Service Providers**

We share your information with third-party service providers who complete transactions or perform services on our behalf or for your benefit, such as:

- Payment and donation processing
- Marketing and analytics
- Processing employment applications
- Processing admissions applications
- Alumni and donor outreach and engagement
- Event registration and coordination
- Course registration, administration and coordination
- Course evaluations and assessments
- Providing course platforms or tools that enable or enhance our academic offerings
- Educational operations and collaborations
- Research insights and analytics
- Performing human resources administration, including for employee benefits
- Customer relationship management (CRM) services, such as for Tufts Support Services and Tufts Technology Services' Support Desk
- System maintenance and security

### **Partners**

We may share your information with other institutions and organizations for the purposes of administering programs and services, such as:

- Cross-registration for courses and programs with other universities
- Study abroad at foreign universities
- Online education offerings through online platforms
- Research arrangements with other universities and partners
- Conference, workshop and similar proceedings
- Events and activities with clubs and special interest groups

### **Third-Party Mobile App Providers**

Our Services on your mobile device may gather and transfer your information, including location information, from and to other applications, functions and tools within your mobile device.

### **Legal Process, Safety and Terms Enforcement**

We may disclose your information to legal or government regulatory authorities as required by applicable law. We may also disclose your information to third parties as required by applicable law in connection with claims, disputes or litigation, when otherwise required by applicable law, or if we determine its disclosure is necessary to protect the health and safety of you or us, or to enforce our legal rights or contractual commitments that you have made.

### **User Generated Content**

Some of our Services may enable users to submit their own content for courses, assignments, contests, blogs, videos, and other functions. Unless otherwise indicated, please remember that any information you submit or post as user-generated content to our Services may become public information. You should exercise caution when deciding to disclose your personal, financial or other information in such submissions or posts. We cannot prevent others from using such information in a manner that may violate this Privacy Statement, the law, or your personal privacy and safety. We are not responsible for the results of such postings.

### **Links to Third Party Sites and Social Media**

The Services may include links to websites, applications and digital services operated by third parties. This Privacy Statement does not apply to, and we are not responsible for the content, privacy policies or data practices of third parties that collect your information. We encourage you to review the privacy policies for those third parties to learn about their information practices.

### **Services Used by Minors**

The Services are not directed to individuals under the age of thirteen (13), and we do not knowingly collect personal information from individuals under 13.

### **Personal Information of Persons outside the United States**

The Services are published in the United States and are subject to the laws of the United States. If you are located in a country outside the United States and voluntarily submit personal information to us, your information will be used as provided in this Privacy Statement and will be transferred to, and/or be stored in, the United States.

[The Global Privacy Statement for Personal Data](#) also provides information with respect to personal information that may be subject to Privacy Laws that include notice and other requirements that may apply to your personal data. Among those Privacy Laws are the EEA GDPR and the UK GDPR. Various other notices are published in relation to the use of the personal data protected under the Privacy Laws 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 [Online](#)

[Education and Non-Degree Educational Program Participants](#). Those Privacy Statements include information about the purpose and legal basis under the EEA GDPR, the UK GDPR and other Privacy Laws for the use and other processing of that personal information, including the transfer of information out of the EEA, the UK or other countries, and the rights associated with that personal information under the EEA GDPR, the UK GDPR and other Privacy Laws.

## Inquiries and Changes to this Privacy Statement

If you have any questions about this Privacy Statement, please contact [dataprivacy@tufts.edu](mailto:dataprivacy@tufts.edu).

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. Your continued use of the Services following the posting of changes to this Privacy Statement will mean you accept those changes.

This Privacy Statement was last updated effective on July 9, 2021.