Privacy Statement for Prospective Students and Applicants

Effective starting May 25, 2018, last revised effective on March 1, 2022

This statement provides information about the use of 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 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). The Tufts University PIPL Privacy Statement applies to personal information subject to the Personal Information Protection Law (PIPL) of the People’s Republic of China. Tufts is committed to processing your personal data in compliance with the Privacy Laws and has prepared this statement to provide you with information about your rights under the Privacy Laws, including the EEA GDPR and UK GDPR.

This statement should be read together with the Global Privacy Statement for Personal Data, which provides information regarding:

- What is “personal data” and what does “processing” mean?
- If I am outside of the United States, will my personal data be transferred out of the country where I am located or reside?
- What rights do I have with respect to my personal data?

1. Who will process my personal data?

The information provided here applies to the collection, use, sharing, disclosure and other processing of your 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 personal data as you progress through the admissions and financial aid process.

2. What 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, Escrip-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 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, the Graduate School of 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 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 personal data about you that is classified as sensitive under the Privacy Laws. This includes information classified as “special category” under the EEA GDPR or the UK GDPR, which require additional protections. The information may include information concerning your race, ethnicity, sexual orientation, or health/disability. We use this information for planning and monitoring purposes, and 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” personal data are managed very carefully.

We consider the processing of this personal data to be necessary for compliance with a legal obligation (e.g. equal opportunities monitoring), or necessary for the professional licensing requirements or the performance of tasks we carry out in the public interest (e.g. teaching and research). If we require your consent for any specific use of your personal data, we will collect it at the appropriate time.

“Tufts does not discriminate in admissions, employment, or in any of its educational programs or activities on the basis of race, color, national or ethnic origin, ancestry, age, religion or religious creed, disability or handicap, sex or gender (including pregnancy, sexual harassment and other sexual misconduct including acts of sexual violence such as rape, sexual assault, stalking, sexual exploitation, sexual exploitation and coercion, relationship/intimate partner violence and domestic violence), gender identity and/or expression (including a transgender identity), sexual orientation, military or veteran status, genetic information or any other characteristic protected under applicable federal, state or local law.” Tufts’ Non-Discrimination Policy.

3. What are the purposes and lawful bases of the processing?

Tufts will use your personal data provided on your application admission, 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 lawful bases under the EEA GDPR, the UK GDPR and other Privacy Laws 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.
<table>
<thead>
<tr>
<th>Category of Personal Data (including Optional and Required Personal Data)</th>
<th>Purposes of Collecting and other Processing</th>
<th>Lawful Bases for Collecting and other Processing</th>
</tr>
</thead>
</table>
| **Contact Information**  
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 |
| **Identifying Information**  
including date and/or place of birth, Social Security number or other personal governmental identifier, passport number, alien registration number, citizenship or immigration status | 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 | To process transactions requested by you and meet our contractual obligations  
Our legitimate interests  
For compliance with a legal obligation  
Your consent, if applicable |
| **Demographic Information** 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 | 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 | To process transactions requested by you and meet our contractual obligations

Our legitimate interests

For compliance with a legal obligation

Your consent, if applicable |
| --- | --- | --- |
| **Education History** including your prior schools, transcripts, school activities, scholarly work and disciplinary records | 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 | To process transactions requested by you and meet our contractual obligations

Our legitimate interests

Your consent, if applicable |
<table>
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<tr>
<th><strong>Testing History</strong></th>
<th>To evaluate your eligibility for admission; to evaluate eligibility for merit and endowed scholarships with specific requirements; to respond to records requests</th>
<th>To process transactions requested by you and meet our contractual obligations</th>
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</table>

including standardized testing and corresponding identity verification documentation

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<tr>
<th><strong>Personal History</strong></th>
<th>To evaluate your eligibility for admission; to evaluate eligibility for merit and endowed scholarships with specific requirements; to respond to records requests</th>
<th>To process transactions requested by you and meet our contractual obligations</th>
</tr>
</thead>
</table>

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

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<tr>
<th><strong>Employment and Professional History and Criminal Record</strong></th>
<th>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</th>
<th>To process transactions requested by you and meet our contractual obligations</th>
</tr>
</thead>
</table>

including resume or CV, job title, location, and work experience, professional certifications, and your self-reported and publicly available criminal record

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<tr>
<th><strong>Personal Financial Information</strong></th>
<th>To evaluate your eligibility for financial aid and determining what financial aid will be offered to you; to respond to records requests</th>
<th>To process transactions requested by you and meet our contractual obligations</th>
</tr>
</thead>
</table>

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

Our legitimate interests

Your consent, if applicable

For compliance with a legal obligation

Your consent, if applicable
### Family Financial Information

including family member names, ages, education, occupations, wages, and savings

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<tr>
<th>Purpose</th>
<th>Description</th>
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<tbody>
<tr>
<td>To evaluate your eligibility for financial aid and determining what financial aid will be offered to you; to respond to records requests</td>
<td>To process transactions requested by you and meet our contractual obligations</td>
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<td></td>
<td>Our legitimate interests</td>
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<td>Your consent, if applicable</td>
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### Payment Information

depending on your means of payment, your payment card number or your bank and bank account number

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<thead>
<tr>
<th>Purpose</th>
<th>Description</th>
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<tbody>
<tr>
<td>To receive payment of application fees and refunds, if applicable</td>
<td>To process transactions requested by you and meet our contractual obligations</td>
</tr>
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<td></td>
<td>Our legitimate interests</td>
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<td></td>
<td>Your consent, if applicable</td>
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Additionally, Tufts may use or disclose the information provided for statutory, public interest and other purposes, including:

- 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 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).

### 4. Will Tufts share my 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 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 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.
5. How is my personal data used if I am admitted and decide to enroll?

If you are accepted and decide to enroll, we will use your personal data for the purposes described at “How is my personal data used?” in the 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.

6. How long will my personal data be kept?

We will store your 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 Privacy Statement for Students.

7. 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 consult the Global Privacy Statement for Personal Data and How to make a Subject Access Request or contact Tufts’ Data Privacy Team at dataprivacy@tufts.edu, or your prospective school, as appropriate.

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 have similar rights under other Privacy Laws.

8. 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 effective on March 1, 2022.