

## Privacy Statement for Students

Effective starting May 25, 2018, last revised effective on July 9, 2021.

The following statement has been prepared to provide notice to students whose personal data is collected, used or otherwise processed by Tufts University, including its schools, while they are students at Tufts. 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). 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?

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 Tufts’ [FERPA Policy](#). 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.

### 1. How does this webpage relate to other information about data protection?

When you applied to become a student, you were told how Tufts would use your personal data to process your application and for related purposes (see [Privacy Statement for Prospective Students and Applicants](#)). You were referred to this webpage for a fuller statement of the uses we make of your personal data while you are a student at Tufts.

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 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](#)).

Additional information for students participating in Tufts-sponsored study abroad programs is available at [Privacy Statement for Students in Tufts-Sponsored Study Abroad Programs](#).

Additional information for students participating in online education and non-degree educational programs is available at [Privacy Statement for Online Education and Non-Degree Educational Program Participants](#).

### 2. Who will process my personal data?

The information published here applies to the use, sharing and disclosure of your personal data by Tufts University, including its schools, units, centers and other affiliated organizations.

### 3. What personal data will be collected, used or otherwise processed?

The personal data that Tufts keeps a record of may include the personal data:

- you provided in connection with your admission to Tufts, including financial aid applications, (see [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 that we offer.

Among the personal data included may be your name, home and local addresses, student identification number, Social Security number or other governmental identification numbers, date of birth, courses taken, fee payments, financial aid provided, and information about your

examinations, assessments and results.

Your 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, or the systems used by Tufts libraries). It is Tufts' policy to limit access to and the use of your 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.

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](#).

#### 4. What are the purposes and lawful bases of the processing?

Tufts may process your 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, record the details of your studies (including any placements with external organizations), and determine or confirm your academic achievements (e.g. results, awards).
- Where relevant, to monitor, evaluate and support your research activity.
- To administer the financial aspects of your relationship with us and any funders.
- To deliver services to you (e.g. IT, athletics, libraries, accommodation, careers, housing).
- To enable your participation at events (e.g. functions, commencement).
- To communicate effectively with you by mail, email and phone, including the distribution of relevant newsletters and circulars.
- To operate security, governance, disciplinary (including plagiarism and academic misconduct), complaint, audit and quality assurance processes and arrangements.
- To support your training, medical, safety, and 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 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 program), 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 of an external organization (e.g. to enable your access to external services). If we require your consent for any specific use of your personal data, we will collect it at the appropriate time. We will not use your personal data to carry out any wholly automated decision-making that affects you.

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

As described above, your 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 personal data as relevant with:

- Your Funders and Sponsors. We may share your personal data with organizations that may provide you funding or other financial sponsorship.
- Parents, Spouses, and Guardians. In some cases, we may share your 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 personal data with such third parties.

- University Affiliated Programs. We may share your 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 personal data with student clubs and other organizations in order to facilitate your knowledge of those groups.
- Research and Studies. We may share your personal data with third parties that study topics related to higher education. We may also share your 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 personal data with the National Student Clearinghouse and other relevant higher education organizations.
- Required by Law and/or Governmental Authorities. We may share your 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 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 personal data with local governmental authorities, including the police and other law enforcement bodies, and statutory regulatory bodies.
- 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 personal data in other cases when there is a compelling purpose regarding benefit to the Tufts or members of our community.
- De-Identified and Aggregate Information. We may use and disclose information about our students in de-identified or aggregate form without limitation.

We will normally confirm details of your results and degrees awarded to external enquirers or organizations, and will provide references to third parties. Your name and the type of degree awarded will be published in the relevant graduation program, unless a Privacy Block is in place.

If your personal data includes basic contact details, that information may be included in our online directory, though you can choose to limit what information is visible (<https://directory.tufts.edu/edit.cgi>). In addition, please see the information provided at the start of this statement with respect to FERPA.

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

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

## 7. How are my personal data used after I graduate?

Core records for matriculated students are generally retained indefinitely so that the details of your academic achievements can be confirmed and for statistical or historical research. See [Records Retention Schedule](#). Your contact and core personal details are passed to the Office of Alumni Relations while you are still a student so that you can be added to the alumni database. A statement for alumni and donors setting out how their personal data is used by Tufts is published at [Privacy Statement for Alumni, Donors and Other Tufts Supporters](#).

## 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 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](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 have similar rights under other Privacy Laws.

## 9. 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 July 9, 2021.