

Privacy Statement for Students in Tufts-Sponsored Study Abroad Programs

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, for students applying to Tufts-sponsored study abroad programs in the European Economic Area (the EEA), the UK, or other countries, and for students while they are studying in 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). 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, the Privacy Statement for Students, and the Privacy Statement for Prospective Students and Applicants found at [Privacy](#). The Global Privacy Statement for Personal Data 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?

If you are a student in a study abroad program in the EEA, the UK or another country 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 EEA GDPR, the UK GDPR or other Privacy Laws.

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?

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](#)).

2. Who will process my personal data?

Your 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 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 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.

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

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

Among the 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, visa information, 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 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 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 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 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 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, UK or other country), 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 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:

- *Affiliated Universities and Colleges.* If the Tufts-sponsored program is affiliated with another university or college, we will share 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 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 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.

We will normally confirm details of your results and degrees awarded to external enquirers or organizations, and will provide references to third parties.

6. How are my 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](#).

7. 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). 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](#).

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, or the director for your program, 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.

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.