



Policy Title	Notice of Privacy Policy
Policy Category	Ethics, Integrity and Legal Compliance Policies
Policy Approval Date	July 13, 2018
Policies Superseded	None
Responsible Office	General Counsel
Related Policies	None
Frequency of Review	Three years
Date of Revision	

I. SCOPE

This Notice of Privacy Policy (“Policy”) applies to all faculty, staff, and students of Arcadia University and The College of Global Studies (“University”), as well as individuals sharing their personal data with us such as administrators from other universities, parents, guardians, and alumni.

II. POLICY STATEMENT

The University is committed to safeguarding the privacy of personal data. This Policy outlines the collection, use, and disclosure of personal information provided to the University by students, faculty, staff, alumni and other members of the community. When information is submitted to the University, or you use the University's websites and other services, you consent to the collection, use, and disclosure of that information as described in this Policy. The University always endeavors to take reasonable precautions to maintain privacy and security within the sphere of operations. The University cannot guarantee that these efforts will always be successful and, therefore, users must assume the risk of a breach of University privacy and security systems. Individuals are advised to be discreet and cautious in their use of University systems.

III. POLICY

A. General

The University is committed to ensuring the security and protection of personal information that we process, and to provide a lawful and consistent approach to data protection. Arcadia is dedicated to safeguarding personal information under our remit. We will not sell personal information that you provide. No matter where you are located, your personal information will be processed in the United States. The laws of the United States and other countries governing data protection may not be as comprehensive or as protective as the laws in the country where you live.

The University collects, maintains, and shares the information needed to deliver our educational and study abroad services, and/or manage employer responsibilities, and to meet accreditation, regulatory, and statutory requirements. This includes but is not limited to: US regulation for Personally Identifiable Information (PII), Family Educational Rights and Privacy Act (FERPA), and the provisions of Regulation (EU) 2016/679 - Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“EU GDPR”).

The laws in some countries require us to inform you of the lawful grounds we rely on to collect, use, disclose, and otherwise process your personal information. To the extent those laws apply, our lawful basis for processing your personal information is in support of our legitimate interests, where those interests are not overridden by your fundamental rights and freedoms. Those interests include, but are not limited to, (i) providing services to students; (ii) processing applications for enrollment or employment; (iii) sending communications to you to advise you on the status of applications for enrollment or employment, or to advise you of Arcadia University events; (iv) analyzing and improving our operations (e.g., optimizing the design and operation of our website); (v) and managing legal issues.

The laws in some countries require us to gain consent for the collection of certain items of personal data. To the extent that those laws apply to any data we collect, we will gain consent from the individual providing the data, pursuant to the applicable laws.

The University will handle all personal data you provide to Arcadia University, as well as personal data about you that the University has received from or shared with third parties, in accordance with its policies and applicable law in connection with our education and study abroad services or employer responsibilities. Your personal data will be handled by the University with purpose limitation, accuracy, storage limitation, integrity, confidentiality, and accountability.

Any specific questions about your personal data or to exercise your data privacy rights can be directed to DataProtection@arcadia.edu.

All personal data shall be processed exclusively for the University's institutional purposes connected or related to the activities carried out by the University or its partners in accordance with applicable laws. Your personal data may be securely transferred, processed, and stored overseas. Access to your personal data will be monitored and should a breach occur, appropriate notifications will be made.

If you are within the European Union, you have the right to request access to your personal data and the rectification of inaccurate personal data from the University. If you are within the European Union, you also have the right to obtain from the University the erasure or the restriction of processing of your personal data in certain circumstances, including when the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed, except when the University is required by law to maintain or otherwise process your personal data for the establishment, exercise, or defense of legal claims, or the protection of the rights of another person. You may exercise these rights by contacting the University using the contact information provided above. If you are within the European Union, you also have the right to lodge a complaint with a supervisory authority, in particular in the country of your habitual residence, place of work, or place of alleged infringement of the applicable law.

B. Applicable specifically to students

The University collects and uses personal data for the administration of our study abroad programs and to comply with certain legal and regulatory obligations. The personal data is collected, used, and shared to facilitate your planning, enrollment, participation, and assessment in the University's study abroad programs. To that end, your personal data may be shared with home schools, hosts, and partner institutions, health insurance companies, housing accommodation providers, financial service providers, internship placements and other relevant third parties who may process your personal data to facilitate your participation in your study abroad program.

We may collect and share the following types of personal data about you:

- ❖ Your name, contact details, physical mailing address, location, email address, home school, IP address and information necessary to facilitate your planning, enrollment, participation, and assessment in our study abroad programs such as academic, health, and emergency contact information. This includes copies of documents you provide, which in the case of your passport includes details of your full name, date of birth, place of birth, gender, nationality and facial image.
- ❖ We also collect details of your interactions with us through our advising, enrollment management, and support services online, via email, in person, and by telephone.
- ❖ For information on how we collect and manage information on our various web properties, please see the University's Data Protection & Use Notification located at:

<http://studyabroad.arcadia.edu/website-privacy-and-usage-statement/>

- ❖ Data from sources that you have agreed can share your personal data.
- ❖ Other information you chose to provide to support your health, safety, and well-being in your program.

Whenever we collect or process your personal data, we will only keep it in accordance with the University's Record Retention Policy and for the purpose for which it was collected. At the end of that retention period, your personal data will either be deleted completely or anonymized, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

C. Applicable specifically to University employees

Personal data in connection with your employment with the University is required for but not limited to: fulfilling the obligations established by any applicable United States or local law, such as GDPR, immigration, labor, tax, social security contribution requirements, payroll, benefits, safety, other employee/employer requirements, and/or contractual obligations as well as for the administration and performance of academic, co-curricular, and related services.

D. Notification of Changes

The University reserves the right to change this Policy at any time. We will always immediately republish this Policy to reflect those changes and posting appropriately changed versions of this Policy at this location will constitute sufficient notice of those changes in our Policy.

IV. DEFINITIONS

University means Arcadia University, its colleges, schools, affiliates, divisions and subsidiaries.

Personal information or personal data is any information that relates to an identified or identifiable living individual. Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data.

General Data Protection Regulation or GDPR is a regulation on data protection and privacy for all individuals within the European Union (EU). It also addresses the export of personal data outside the EU.

European Union (EU) is a political and economic union of 28 member states that are located primarily in Europe. The fundamental purposes of the European Union are to promote greater social, political, and economic harmony among the nations of Western Europe.

V. EFFECTIVE DATE

This Policy is effective on the date that it is signed by the President.

VI. SIGNATURE, TITLE AND DATE OF APPROVAL

By: 
Ajay Nair, President

Date: 7/13/18