

Employee; Adjunct Faculty, and Employee Applicant Privacy Notice

IN COMPLIANCE WITH THE GENERAL DATA PRIVACY REGULATION (GDPR)

Effective Date: [May 25, 2018]

We at Webster University (“Webster”, “we”, “our”, “us”) understand that privacy is important to you. Webster University wants you to know that we respect your privacy and that we are committed to safeguarding your personal information (“Personal Information”). This is why we want to provide you with a clear picture of how the Personal Information that you provide to us in connection with your work at Webster University is processed, managed, and protected by us. This Employee Privacy Notice (“Privacy Notice”) contains important information regarding our privacy practices and the choices we offer our current and prospective employees with respect to their Personal Information. If you choose to provide us with your Personal Information, you are telling us that you understand and accept the privacy practices detailed in this Privacy Notice and authorize us to take actions consistent with this Privacy Notice. We strongly encourage you to read this Privacy Notice in its entirety to understand Webster’s privacy practices in advance of submitting any Personal Information to us. If you have any questions regarding this Privacy Notice or any of our related privacy policies, please do not hesitate to contact our GDPR Privacy Manager by phone at: +30-211-990-5305 or email: mazarakist@webster.edu

This Privacy Notice will inform you about:

- Scope of the Notice
- How We Collect Your Information
- The Types of Information Webster Collects
- How Webster Uses Current and Prospective Employee Information
- The Bases for Processing Your Personal Information
- Sharing Your Personal Information with Others
- International Transfers of Your Personal Information
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Scope of the Notice

This Privacy Notice applies to our collection, use, and retention (“processing”) of Personal Information, including any information transferred outside of the EEA or Greece, which identifies, or can be used by us or on our behalf to identify, an individual (“Personal Information”).

How We Collect Your Information

At Webster, we may collect Personal Information from or about you in a number of ways, for example:

- From the information you voluntarily provide to us when you first express an interest in employment at Webster;
- When you voluntarily apply for employment at Webster and complete other hiring related processes and procedures;
- When you voluntarily communicate with us in person, by telephone, email, or via our website;
- As you interact with us during your time as an employee at Webster for the various purposes set out in this Privacy Notice;
- From third party entities, such as your previous or current employer, business and personal references, educational references, criminal and credit background checking service providers, as well as other third-party individuals or entities that may provide information about you;
- Information collected through disciplinary and grievance procedures; and
- Information collected through surveys and feedback mechanisms.

The Types of Information We Collect

We may collect the following types of Personal Information about you:

- Your name and contact information, such as your address, email address, and telephone number, as well as your date of birth, National Tax Identification number (AFM) national insurance number (AMKA), passport number or national identity card details, country of domicile, and nationality;
- Information relating to your education and employment history
- Records related to your use of our facilities and services;
- Photographs from events and CCTV footage;
- Sensitive Personal Information, including:
 - information about criminal convictions and offences;
 - information about your health and medical conditions (e.g. disability and dietary needs); and
 - Information about your national origin and your religious beliefs

How Webster Uses Current and Prospective Employee Information

We may use Personal Information (including Sensitive Personal Information) we collect from and about you during your employment with us to:

- Recruit and/or hire you as an employee at Webster;
 - maintaining employment records; and
 - assessing eligibility for employment and/or continued employment;
- Provide library, IT, media, and other information services;
- Provide support of our core services, including:
 - providing employee support services;
 - providing of ancillary health and other services;
 - monitoring of equal opportunities;
 - safeguarding and promotion of employees' welfare;
 - ensuring employee safety and security;
 - managing employee accommodations;
 - managing the use of social media;
 - managing facilities on campus;
- Administer finances (i.e. payroll, supplemental pension schemes, health and other insurance information, etc.);
- Provide other administrative functions, including:
 - Maintaining a directory of employees and services
 - carrying out research and statistical analysis;
 - carrying out audits (i.e. to ensure compliance with our regulatory and legal obligations);
 - providing operational information (i.e. providing IT support, information about building closures or access restrictions on campus, or safety advice);
 - promoting our services (e.g. providing information about events happening on and off campus);
 - preventing and detecting crime;
 - dealing with grievances and disciplinary actions;
 - dealing with complaints and inquiries;
 - archiving and statistical purposes; and
- Hold the annual commencement ceremony including for:
 - passing such information to third parties to facilitate the ceremony, including media;
 - preparing the commencement program; and
 - promoting and archiving the ceremony on our website.

The Bases for Processing Your Personal Information

We may process your personal information because it is necessary for the execution of a contract with you or in order to take steps at your request prior to entering into a contract. In this respect, we may use your Personal Information to:

- Interact with you before you are employed at Webster University, as part of the hiring process (e.g. to send you information or answer your inquiries about the positions);
- Provide you with the services as set out in any of our employee/faculty policies
- Address any concerns or feedback you may have; and
- Facilitate any other contractual purpose for which you provide us with your Personal Information.

We also may process your Personal Information because it is necessary for our legitimate interests. In this respect, we may use your Personal Information for any of the following:

- To monitor and evaluate the performance and effectiveness of the university, including by training and monitoring employee performance;

- To maintain and improve the academic, corporate, financial, and human resource management of the University;
 - To promote equality and diversity throughout the University;
 - To seek advice on our legal rights and obligations as well as bring forward any legal action;
 - To fundraise and for alumni purposes; and
 - To perform our duties in carrying out our mission, vision, and values .
- We also may process your Personal Information for compliance with our legal obligations. In this respect, we may use your Personal Information for the following:
- To meet our compliance and regulatory obligations;
 - For the prevention and detection of crime; and
 - In order to assist with investigations (including criminal investigations) carried out by responsible authorities.
- We also may process your Personal Information where:
- It is necessary for emergency medical purposes;
 - It is necessary to protect your or another person's vital interests; or
 - We have your specific or, where necessary, explicit consent to do so.

Sharing your personal information with others

For the purposes referred to in this Privacy Notice and relying on the bases for processing as set out above, we may share your Personal Information with certain third parties. In some cases, you will be asked to opt in to these data sharing arrangements. In those cases, you should carefully consider the possible impact that not opting in will have. Third party recipients may include:

- Our affiliates and contractors where there is a legitimate reason for their receiving the information, including:
 - third parties who work with us to provide work place accommodation;
 - third parties who work with us to provide support services such as IT, security, and staffing;
 - third parties who are contracted to provide out-of-hours services for us; and
 - internal and external auditors.
- Professional and regulatory bodies in relation to the confirmation of qualifications, professional registration and conduct, and the accreditation of courses;
- Governmental departments and agencies where we have a legal obligation to provide information, including but not limited to social insurance agencies, the Greek Ministry of Finance, the Greek National medical and pension fund organization (EFKA), the Employment Agency of Greece, and the Greek Ministry of Education and Religion;
- Legal representatives and Courts of Law;
- Pension funds;
- University physician or nurse
- Crime prevention or detection agencies; and
- Next-of-kin (where there is a legitimate reason for disclosure)
- Your professional contact details will be published on the Cisco telephone directory, on the internal phone list, and on the faculty and staff directory at <http://www.webster.edu/directory.html>. This information is published based on a legitimate interest to ensure smooth business operations, and you may object to this publication on the basis of valid reasons.

International transfers of your personal information

Some of the Personal Information we process about you will be transferred to, and stored at, a destination outside the European Union ("EU"), the European Economic Area ("EEA"), and Switzerland. This happens, for example, where it is processed by employees operating outside the EU, the EEA, or Switzerland who work for us or for one of our suppliers, or where Personal Information is processed by one of our suppliers who is based outside the EU, the EEA, Switzerland, or who uses storage facilities outside the EU, the EEA, or Switzerland.

In these circumstances, your Personal Information will only be transferred on one of the following bases:

- Where you have provided explicit consent for the transfer;
- Where the transfer is necessary in relation to a contract or a legal claim;
- Where the transfer is made on the basis of an adequacy decision;
- Where the transfer is subject to one or more appropriate safeguards for international transfers prescribed by applicable law; or
- Where the transfer is necessary for the execution of a contract with you or in order to take steps at your request prior to entering into a contract.

Changes to your personal information

Please tell us promptly about any changes to the Personal Information you have voluntarily provided to us. This is particularly important with respect to your contact details.

How long we keep your personal information

We will retain your Personal Information for as long as needed to meet the uses described in the “How We Use Current and Prospective Information” section of this Privacy Notice in compliance with legal document retention obligations. Even where you have exercised one of the rights listed below with respect to your Personal Information, we may have the right to retain your Personal Information for compliance with a legal obligation, for the performance of a task carried out in the public interest, for archiving purposes in the public interest, for scientific or historical research purposes, for statistical purposes, or for the establishment, exercise, or defense of legal claims.

Your rights with respect to your personal information

Under the General Data Protection Regulation (GDPR), you may have the following rights:

- To obtain access to the Personal Information that we hold about you;
- To object on grounds relating to your particular situation to our processing activities where you feel they have a disproportionate impact on your interests, rights, and freedoms;
- If you believe that the Personal Information we possess is, or has become, incorrect or is incomplete, you may request to review, revise, correct, or update any of the Personal Information we may have about you free of charge;
- To restrict the processing activities related to your Personal Information (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- To have your Personal Information erased;
- To have Personal Information, which you have voluntarily provided to us, produced in a structured, commonly used, and machine-readable format, including for the purpose of transmitting it to another party; and
- To require us not to send you marketing communication.

Please note that the above individual rights are not absolute, and we may be entitled to refuse requests where certain exceptions apply. If you have given your consent and you wish to withdraw it, please contact our GDPR Privacy Manager by phone at: +30-211-990-5305 or email: mazarakist@webster.edu. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

If you have any questions about your rights regarding your Personal Information, please simply write to us at the postal address provided in our Contact Information below, where you may initiate a request to access, reject, correct, restrict, or erase your Personal Information, or where you may initiate a request for transfer of your Personal Information or initiate a request that we refrain from sending you marketing information.

Privacy concern handling process

Webster is committed to resolving complaints about your privacy and our processing of your Personal Information. Individuals with inquiries or complaints regarding this Privacy Notice should first contact our GDPR Privacy Manager by phone at: +30-211-990-5305 or email: mazarakist@webster.edu. In the event that resolution cannot be reached, you may also contact the local data protection authority (“DPA”), which may investigate your complaint further.

Data Protection Authority Offices
Kifissias 1-3
115 23 Athens
Greece

Protection of Your Personal Information

Webster takes reasonable and appropriate measures to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into due account the risks involved in the processing and the nature of the Personal Data.

Revisions to this privacy notice

Webster reserves the right, at our sole discretion, to change, modify, add, remove, or otherwise revise portions of our policies and this Privacy Notice at any time, consistent with the requirements of applicable law. When we do, we will post the revision(s) on our website. If we change the Privacy Notice in a material way, we will provide appropriate notice to you. The “Effective Date” at the top of this Privacy Notice reflects the date of the most recent revisions. We encourage you to periodically review this link for the latest information on our privacy practices.

Our contact information

If you have questions about our University Privacy Statement, this Privacy Notice, our privacy practices, or any other aspect of your privacy and the security of your personal information, please contact our Privacy Manager by phone: +30-211-990-5305 or email: mazarakist@webster.edu. You may also write to us at:

Webster Athens – GDPR Privacy Manager

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