

Student Privacy Notice

IN COMPLIANCE WITH THE GENERAL DATA PRIVACY REGULATIONS (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. 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 studies at Webster University is processed, managed, and protected by us. This Student Privacy Notice (“Privacy Notice”) contains important information regarding our privacy practices and the choices we offer our current and prospective students 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 campus GDPR Privacy Manager by phone or email using the contact details provided at the end of this document.

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 Student Information
- The Bases for Processing Your Personal Information
- Sharing Your Personal Information with Others
- International Transfers of Your Personal Information
- Student Survey
- Changes to Your Personal Information
- How Long We Keep Your Personal Information
- Your Rights with Respect to Your Personal Information
- Privacy Concern Handling Process
- Privacy and Children
- Protection of Your Personal Information
- Revisions to this Privacy Notice
- Our Contact Information

Scope of the Notice

This Privacy Notice applies to our collection, use, and retention (“processing”) of Personal Information, including any information transferred from outside the United States that we receive and record in the United States, 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 studying at Webster;
- When you voluntarily apply to study at Webster and complete other admissions-related processes and procedures, as well as when you enroll in courses;
- When you voluntarily communicate with us by telephone, email, or via our website in order to make enquiries or raise concerns;
- As you interact with us during your time as a student at Webster for the various purposes described in this document;
- From third party entities who you have requested or authorized to provide information, such as your previous or current school, sixth form college or equivalent, university, or employers, who may provide reference information about you or who may sponsor your studies, as well as other third-party individuals or entities that may provide information about you;
- Information collected through disciplinary and grievance procedures;

- Information collected through the administration of student housing; and
- Information collected through surveys and feedback mechanisms.

The Types of Information Webster Collects

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

- Your name and biographical information;
- Information about your racial or national origin, religious or similar beliefs, or sexual orientation.
- Information relating to your education and employment history, the school(s), sixth form college(s) or equivalent(s), and other colleges or universities you have attended, the places where you have worked, the courses you have completed, dates of study, and examination results, including information relating to assessments of your work, details of examinations taken, your predicted and actual examination grades, information regarding academic and extracurricular interests, and other student record-related information;
- Records related to your use of our facilities and services;
- Photographs from events and CCTV footage;
- Information about your involvement, activities, and awards;
- Financial information including tuition, fees, donations, scholarships, etc.;
- Information about your family or personal circumstances;
- Sensitive Personal Data, including:
 - Information about criminal convictions and offences;
 - Information about your health and medical conditions (e.g. disability and dietary needs)

How Webster Uses Current and Prospective Student Information

We may use Personal Information (including Sensitive Personal Data) we collect from and about you during your association with us for the following purposes:

- Recruit and/or admit you as a student at Webster;
- Facilitate academic matters, including for:
 - The provision of our core teaching, learning, and research services (e.g. registration, assessment, attendance, managing progress, academic misconduct investigations, certification, and graduation)
 - Maintaining student records; and
 - Assessing your eligibility for bursaries and scholarships;
- Provide library, IT, media, and other information services;
- Provide support of our core services in non-academic matters, including:
 - Monitoring of equal opportunities;
 - Safeguarding and promotion of students' welfare;
 - Ensuring students' safety and security;
 - Managing student employment, assistantships, and internships;
 - Managing student accommodations;
 - Managing the use of social media;
 - Managing facilities on campus, including parking;
- Administer finances such as fees, scholarships, federal and state grants, or financial aid;
- Provide other administrative functions, such as:
 - Carrying out research and statistical analysis;
 - Carrying out audits to ensure compliance with our regulatory and legal obligation
 - Providing operational information
 - Promoting our services
 - Preventing and detecting crime
 - Dealing with grievances and disciplinary actions;
 - Dealing with complaints and inquiries;
- Provide for archiving and statistical purposes;
- Provide student contact details to contractors to carry out surveys.
 - These contractors will use students' details only for a specific purpose pursuant to our instructions and will then delete them. If you do not wish to participate in any of these surveys, please inform our campus Privacy Manager by phone or email using the contact details provided at the end of this document.; and
- Hold the annual commencement ceremony such as:
 - Passing such information to third parties to facilitate the ceremony (local newspapers, commemorative clothing providers, photographers, caterers, etc.);
 - Preparing the commencement booklet; 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 enrolled as a student, as part of the admissions process such as sending a prospectus or answering inquiries about courses;
- To provide you with services as outlined in our various policies;
- Address any concerns or feedback you may have; and
- Facilitate any other 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 provide you with educational services which may not be set out in our Student Code of Conduct or our Extended Campus Code of Conduct, but which are nevertheless a part of our academic and educational mission;
- To monitor and evaluate the performance and effectiveness of the university, including by training our employees or monitoring their 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 and to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other students or faculty, visitors to the University, or anyone else who could be harmed by such activities;
- To fundraise and for alumni purposes;
- To perform our duties in carrying out our mission, vision, and values; our Strategic Plan; and our Policies and Community.

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 the police and other 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. We may share your information with certain third parties described below. 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 on provision of our core teaching, learning, and research service to you. 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 student accommodation;
 - Third parties who work with us to provide student support services (i.e. counseling, health services, etc.);
 - Third parties who are contracted to provide services such as IT, security, and staffing;
 - Organizations operating software on our behalf; and
 - Internal and external auditors.
 - Those with an interest in tracking student progress and attendance, including:
 - Student sponsors (scholarship or other donors);
 - Current or potential education product and service providers;
 - Current or potential employers (to provide references and, where students are sponsored by their employer and/or where you take part in a placement, to provide details of progress/attendance);

- 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;
- Crime prevention or detection agencies;
- Parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure);
- Third parties conducting surveys;
- Third party communication providers; and
- Third party data services providers.

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 occasional and 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. If you are a current student, you may do this through “Connections Login” on the website. Otherwise please contact our campus Privacy Manager by phone or email using the contact details provided at the end of this document.

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 Webster Uses Current and Prospective Information” 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 will 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 Regulations (GDPR), you 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 your Personal Information that 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 request that we erase 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 campus Privacy Manager by phone or email using the contact details provided at the end of this document. 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 or contact our campus Privacy Manager by phone or email using the contact details provided at the end of this document, 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 campus Privacy Manager by phone or email using the contact details provided at the end of this document. In the event that resolution cannot be reached, individuals may also contact their local Data Protection Authority (“DPA”), which may investigate your complaint further.

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

Privacy and Children

The Privacy Notice is not directed to “children”, as defined per Member State implementation legislation, and we do not seek, nor do we knowingly process, Personal Information from children. Where a prospective or current student is classified as a child, we will make reasonable efforts to verify that consent is given or authorized by the holder of parental responsibility over the child, where Personal Information of the child is to be processed.

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 at www.webster.edu/gdpr. 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.

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 GDPR Privacy Manager by phone or email using the contact details provided below.

Webster Athens – GDPR Privacy Manager

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