

I. **About this Policy**

The American University of Paris (“AUP”, “The University”, “we”, “our”, “us”) is committed to protecting the privacy and security of your personal information (“personal data”).

This policy describes the ways we collect and use personal data about alumni, donors, and supporters, including student parents and other friends of the University (“you” and “your”). This policy outlines how we address the responsibilities we hold in relation to the General Data Protection Regulation (GDPR) and related French and United States data protection laws.

II. **This policy’s relation to other policies**

Separate documents exist detailing how we use personal data related to current students, as well as the use of personal data for student applicants, job applicants, and employees.

Additional personal data use policies will be furnished when you use certain services and facilities provided by the University.

Reading this policy and other privacy policies that we may furnish from time to time when we process your personal data is important so that you are familiar with how and why we use your personal data. This policy may be updated at any time.

III. **Definitions**

‘Personal data’ means any recorded information that is about you and that allows you to be directly or indirectly identified. Data that has been appropriately anonymized are not included in this definition because your identity has been definitively removed from the dataset.

‘Processing’ means anything that we do with your personal data, including its collection, its use in decision-making, its storage and maintenance, and its disclosure, deletion or retention.

IV. **Who Uses Your Personal Data?**

The American University of Paris is considered the “Data Controller” for the personal data processed in relation to this policy. Being the “Data Controller” means that we decide how to use your personal data and are responsible for maintaining and using it in compliance with the GDPR and other data protection legislation.

Access to your full or partial alumni record and other data covered under this policy is provided to employees who have a need to see as part of their work to fulfill the purposes described in section VI. It is also shared in certain cases with third parties described in section VII.

V. **What Personal Data is Processed?**

We may process the following personal data:

Certain biographical information

- Personal details (name, address, phone numbers, email addresses, nationality, date of birth, gender, your student ID, family details, etc.);
- Educational details, for former students (including student id, program of study, dates of study, internships, graduation date, degree conferred, etc.) and others (schools attended, etc.);
- Employment information (workplaces, career history, professional history, which may include salary information);
- Information about your interests, activities, honors, and life achievements;

- Pictures or other photographs;
- Links to your public professional social media accounts (LinkedIn, Twitter, websites, blogs);

Information concerning our ongoing relationship

- Your communication preferences, to help us provide communications to you;
- Data obtained through cookies and similar technologies, to understand how you interact with our email communications, websites and other online services we provide (AUP Global). Our websites include relevant cookie policies;
- Records of your personal interactions with us, including correspondence, meeting and conversation notes;
- Your attendance at events organized by AUP or AUP alumni groups;
- Your connection to other alumni, students, staff, donors, friends, networks and/or supporters within the University community;
- Membership and interactions on University social media groups;
- Information about your health, including mobility and dietary restrictions;

Information about your giving and your willingness and capacity to give

- Current and past donations and pledges and relevant documentation;
 - Financial information required to process your gifts;
 - Information regarding your intent to leave a legacy, if provided to us;
 - Plans for activities and future activities;
 - Your relationship to relevant trusts, foundations, corporations, societies, and other groups including boards of trustees;
 - Personal recommendations from other supporters that you may be willing and able to become a supporter;
- For Residents of the United States Only:
- Our understanding of your likely philanthropic interests, which may come from our notes or from publically available information;
 - Your history of giving and philanthropy, including donations to other organizations (when known) and other support you may have provided or provide, such as volunteering roles, which may come from meeting notes or publicly available information;
 - Information about your earnings and assets, including property, which may come from meeting notes or publicly available information.

For US Residents, we augment the data that we hold on you from our own University records with data from our partners (as listed below) and from publicly available data.

We use internet searches and may search the following types of websites (either directly or through search engines), in order to ensure we have accurate information.

- Public sources for corporate data
 - Various internet sites
- Public sources for charities
 - Iwave
- Public sources for individuals
 - Wikipedia
 - Google
 - Who's Who
- Media sources
 - Public news sites
 - Wire services

VI. How the University Uses Your Data

The University uses your personal data for a variety of purposes, including:

- To send you publications, newsletters, and updates about the University;
- To enable your participation at events (e.g. graduation, other alumni events);
- To communicate with you by email, phone, and mail, depending on your contact preferences;
- To provide certain services, such as your alumni email address;

- To send you personalized requests for donations and other proposals;
- To promote engagement opportunities through AUP Global or mentoring opportunities;
- To compile statistics and conduct surveys and research for internal and external reporting;
- To perform analysis and research to improve our understanding of our supporters;
- To maintain internal records, including feedback and complaints;
- To execute administrative functions including donation processing.

The purposes listed above are dependent upon various legal bases including:

1. *When we must meet contractual obligations we have with you*

Many of the reasons for which we process your data are in order to fulfill the contractual obligations we have with you. Personal data processed based on our contractual obligations includes, but is not limited to, the processing of your donations.

2. *When we must fulfill a legal obligation*

Sometimes, your personal data is processed to meet legal obligations. Information processed for these purposes includes information that we must report to French and US government agencies, such as the *French Academie de Paris and Commission Nationale de la Certification Professionnelle*.

3. *When we need to meet a legitimate interest*

Often, we base our processing of your data on our legitimate interests relating to alumni relations, fundraising and feedback and assessment.

For example, we may send you alumni newsletters or alumni magazines.

4. *When we have your consent*

There are some situations where we will ask for your consent to collect and process your personal data. Examples include, but are not limited to, when we ask you to take a survey or when we ask for your permission to collect, process, and share data collected online or sensitive information.

If you fail to provide the information requested for points 1 and 2 above

Not providing information in certain cases described in points 1 and 2 above means that we may not be able to meet our contractual obligations to you or fulfill our legal obligations. For example, if you enter into a donation agreement with us but do not provide your address or other contact details, we will not be able to provide you with tax receipts for your donation.

Purposes of Processing

We process your personal data for the purposes for which we collected it. If we determine that a reasonable reason exists to use it for another purpose that is not related to and/or not compatible with the original purpose, we will seek your consent to use it for the new purpose.

Special Categories of Data

Certain types of data necessitate a higher level of protection. These special categories of data are considered especially sensitive. The University's main operations do not require us to process this type of data regularly but there are some cases where we do. Outside of the cases listed below, we may use these types of data in exceptional circumstances, for example, when it is necessary to protect your or another person's vital interests.

1. *Health Data (including disability and accommodations)*

We will process data about your health when it is required to provide accommodations for disability or when it is required to protect your vital interests or the vital interests of another person. This information may include seating or event access information and dietary restriction information. We may also ask for your explicit consent to process information about your health.

VII. Data Sharing with Third Parties and Entities Within and Outside the European Union and European Economic Area

In order to perform our duties based on our contractual and legal obligations or our legitimate interests, we may occasionally share some of your information with parties external to AUP. These third parties may include:

- Relevant Government Agencies (*L'Académie de Paris, La Commission Nationale de la Certification Professionnelle [Répertoire National des Certifications Professionnelles], France Compétences*);
- Organizations that help us deliver services to you, including surveys (Higher Education Data Sharing Consortium (HEDS)) and relationship and event management services (AUP Global/Hivebright);
- Alumni Groups for whom we help manage events that you may attend;
- External Organizations, including contractors and consultants who provide services to us, such as printing services (name badges, etc.).

When information is shared with third parties, we seek to limit the amount of data shared to just what is necessary. For example, when sending your information to our survey partners, we may only share an alumni ID number and not your name and we may share your alumni ID number only after it has been encrypted.

Any third party that processes data on our behalf must demonstrate that they take measures to protect your data in compliance with the law and with our policies. We never allow them to use your personal data for their own purposes. The University only allows third parties to process your data for the specific purposes for which we have contracted their services and in accordance with our instructions.

Transfer outside of the European Economic Area - EEA (EU plus Norway, Iceland, and Lichtenstein)

Sometimes, we transfer your data outside the EEA. This may be done when we use a provider that is located outside the EEA, or for other reasons. In all such cases, we ensure that the following conditions are met:

1. Either the country to which the data is transferred is recognized by the EU as providing an adequate level of protection;

OR

The organization to which the data is transferred is covered by a scheme recognized by the EU as providing an adequate level of protection;
2. The transfer of personal data is governed by legally-binding contractual clauses between us and the organization receiving the information;
3. The transfer is based on one of the legal bases and is necessary:
 - a. To meet the needs of a contract with you or a contract with another person which is in your interests;
 - b. To protect the vital interests of you or another person;
 - c. To fulfill legal obligations;
 - d. To perform functions in the public interest;
 - e. To perform functions in our legitimate interest;

OR

The transfer has your explicit consent.

Transfers are typically limited situations where the transfer itself is not repeated.

VIII. Data Security and Retention

Your information and its security is important to us. As such, we have put into place multiple and appropriate measures and safeguards to protect your information.

In support of your lifelong relationship with the University, we will retain your personal data related to your time as an alumnus or supporter for the period where you are an active alumnus or supporter. After a certain amount of time, we may archive your data for an applicable period.

Where you exercise your right to erasure for alumni affairs matters, we will maintain a core set of personal data allowing us to ensure we do not contact you inadvertently in future. It is important to note however that we cannot erase your academic record, which will remain archived in accordance with our retention schedule. We may also need to retain some financial records about you for statutory purposes (e.g. for audit and accounting matters).

IX. **Your Rights and Responsibilities**

You have the right to:

- Request access to your data (commonly known as a “subject access request”). This enables you to receive a copy of your data and to check that we are lawfully processing it.
- Request correction of your data. This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- Request erasure of your data. This enables you to ask us to delete or remove your data under certain circumstances, for example, if you consider that there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).
- Object to processing of your data where we are processing it to meet our public interest tasks or legitimate interests.
- Request the restriction of processing of your data. This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your data to another party, subject to applicable law portability conditions.
- Under FERPA, right to consent to the disclosure of your record and its personally identifiable information.

Depending on your request and its nature, we may not be able to execute what you have asked. For example, when we have a statutory or contractual requirement to process your data and it would be impossible for us to fulfill those legal requirements should we stop processing. For example, for tax purposes we may be required to continue processing your information, even if you object.

When you have given consent for a certain type of processing, you can withdraw the consent at any time. When you withdraw consent, we will stop the processing concerned as soon as possible, however, withdrawing consent does not invalidate prior processing of the information.

Keeping your information up-to-date

It is important that the data we hold about you be accurate and current. Please keep us informed of any changes after you leave the University.

X. **Who to Contact and How to Complain**

If you want to exercise any of the rights above or you are unsatisfied with how we have processed your information, please contact the AUP Data Protection Oversight Committee at dataprotection@aup.edu. We will treat your request as soon as we can and may keep records of your communications with us to ensure we can resolve your request.

If you remain unsatisfied, you may lodge a complaint with the French *Commission Nationale de l'Informatique et des Libertés* (CNIL). You may also file a complaint with the United States Department of Education, particularly in relation to our obligations under FERPA.

XI. **Changes to this Policy**

This policy was updated 24 April 2019. It is reviewed when necessary and at least once per year. Any changes will be published here and we will inform you of any substantive changes. Occasionally, we may also alert you in other ways about the processing of your data. The policy was updated 17 November 2020 to include *France Compétences* in Section VII.