

PRINCETON UNIVERSITY
PRIVACY NOTICE FOR OFFICE OF FINANCE AND TREASURY

Princeton University (“Princeton”) respects and protects the privacy of your personal data. This notice, which is pursuant to the European Union’s (“EU’s”) General Data Protection Regulation (“GDPR”), contains information about how and why Princeton collects your personal data and what we do with that information. The GDPR may apply to the processing of personal information that you provide Princeton while you are in the EU, but it does not apply to information that you provide while you are in the U.S. (for example, on campus) or elsewhere outside of the EU.

I. What Constitutes “Personal Data” Under the GDPR?

Personal data is information that Princeton holds about you and which identifies you. This includes information such as your date of birth and address, as well as information like your tax documents and banking information.

Under the GDPR, special categories of personal data are afforded an extra level of security and confidentiality. This includes information about racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, data concerning health, or data concerning sex life or sexual orientation.

II. How We Collect Personal Data

The personal data that Princeton holds about you is obtained from a number of sources and may include the following types of information:

- Name
- Date of birth
- Address(es) and Country of Origin
- Taxpayer ID numbers
- Bank account numbers
- Gender
- Contact information
- Family details and relationships

III. Why We Process Your Personal Data

When you engage with the University as a student, parent, alumnus, donor, or employee, you agree that we can process your personal data for administrative and educational purposes. The purposes of processing include, but are not limited to:

- Tuition payments, parent loans and student loans
- Administering payments for goods or services provided
- Administering payments for reimbursable expenses
- Ensuring proper tax withholding and remittance to the IRS on payments made to you
- Tax compliance, including reporting to the Internal Revenue Service as required and refunds
- Complying with various state unclaimed property laws
- Payroll and payments for reimbursable business expenses
- Travel services, including expense reports and hiring and moving expenses
- Mortgage services
- Administering gifts and endowments
- Sponsored research accounting
- Cash management administration

- Monitoring, scanning and analysis of network traffic and electronic communications involving the use of University systems and/or networks to preserve the security and integrity of University systems and networks

IV. Sending Personal Data to Other Countries

For these purposes, personal data may also be transferred to countries outside of the United States, to countries which may not have data protection laws that offer the same protections as your home country. Examples of circumstances when personal data may be transferred outside the U.S. include:

- Sending payments outside of the US through the international banking systems, at your direction
- Administering research awards for work conducted outside of the U.S.
- Administering travel logistics including itineraries, visas, and transportation details
- Storing data in the cloud where service providers are outside of the U.S.

The European Commission has produced a list of countries which, according to the Commission, have adequate data protection rules. The list can be found here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm.

If the country that we are sending your information to is not on the list, or is not a country within the EEA (which means the EU, Liechtenstein, Norway, and Iceland), then it might not have the same level of protection for personal data as the EU provides.

Upon request, we will provide you with additional information about the safeguards which Princeton has in place outside of this privacy notice. If you have any questions about the safeguards that are in place, please contact infosec@princeton.edu.

V. How We Share Your Personal Data

We may share your personal data with the following third parties or for the following purposes:

- **With our service providers:** We may share your personal data with third parties that help us with our business obligations or that enable us to provide services to you.
- **To improve our services:** For example, we may occasionally use consultants, experts, or other advisors to assist Princeton in fulfilling its obligations and to help run the university properly.
- **With government entities:** In response to a valid government request, we may share your personal data with a government agency or law enforcement. We may also be required to report certain personal data, for example, to the Department of Education, to comply with our obligations under U.S. law or to protect our rights or the rights of others, or prevent fraud or other criminal activity.

VI. Our Legal Basis for Processing Your Personal Data Under GDPR

This section contains information about the legal bases that we are relying on, for purposes of the GDPR, when processing your personal data.

Legitimate interests

Absent overriding, countervailing interests, Princeton may process your personal data for its legitimate interests. Specifically, Princeton has a legitimate interest in:

- Facilitating the efficient operation of the university;
- Promoting the objectives and interests of the university; and
- Ensuring that all relevant legal obligations of the university are complied with

In addition, your personal data may be processed for the legitimate interests of others.

If you object to Princeton using your personal data in a particular situation, please contact our Financial Service Center at finance@princeton.edu.

Contractual obligation

Princeton may process your personal data as necessary for the performance of a contract.

Legal obligation

Princeton may process your personal data in order to comply with a legal obligation. For example, we may also have to disclose your information to third parties such as the courts, local authorities, government agencies, or law enforcement where legally obliged to do so.

Vital interests

Princeton may need to process your personal data to protect your vital interests, or someone else's, for example, to prevent someone from being seriously harmed or injured.

Public interest

Princeton is acting in the public interest when providing students with an education, and we may process your personal data in connection with that public interest.

VII. Processing Special Categories of Personal Data

Special categories of personal data are treated with extra sensitivity. These special categories include: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, health information, and information about sex life or orientation. Princeton may process special categories of personal data under the following legal bases:

Substantial public interest

The processing is necessary for reasons of substantial public interest.

Vital interests

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims

The processing is necessary for the establishment, exercise or defense of legal claims. This allows us to share information with our legal advisors and insurers.

Emergency circumstances and medical purposes

This includes medical treatment and the management of healthcare services.

Consent

We may ask for your consent to use your personal data in certain ways. If we ask for your consent to use your personal data, you can revoke this consent at any time. Any use of your personal data before you withdraw your consent remains valid. Please contact our Financial Service Center at finance@princeton.edu if you would like to revoke any consent given.

VIII. How Long We Retain Your Personal Data

We keep your personal data for as long as we need to in order to provide accurate financial and

regulatory reporting.

We may keep certain personal data indefinitely for historical, research, or statistical purposes.

We will also keep your personal data for as long as necessary to comply with applicable record retention laws and obligations.

For additional information about Princeton's record retention practices, please see Princeton's "University-wide Records Management Principles" (<https://records.princeton.edu/policies-procedures>).

IX. Your Rights Under GDPR With Regard to Your Personal Data

Subject to certain limitations and conditions, you have the following rights with regard to the processing of your personal data:

- **Right of access:** You have the right to request a copy of the personal data that we hold about you.
- **Right of rectification:** You have the right to correct personal data that we hold about you that is inaccurate or incomplete.
- **Right to erasure:** In certain circumstances, you have the right to request that certain personal data we hold about you be erased from our records.
- **Right to restriction of processing:** In certain circumstances, you have the right to restrict certain processing of your personal data.
- **Right of portability:** You have the right to request that personal data we hold about you be transferred to another organization.
- **Right to object:** You have the right to object to certain types of processing of your personal data, such as direct marketing (to the extent applicable).
- **Right to judicial review:** In the event that we refuse a request under rights of access, we will provide you with a reason. Individuals in the EU have the right to object as outlined in the "Further Information and Guidance" section below.

X. Further Information and Guidance

Please contact us using the information below should you have any questions or concerns.

Princeton Financial Service Center finance@princeton.edu
609-258-3080

Please contact the Financial Service Center if:

- You object to us using your personal data for marketing purposes, e.g., to send you information about University events
- You would like us to update the personal data we hold about you
- You would prefer that certain information is kept confidential

If you believe that we have not acted properly when using your personal data you can file a complaint with the appropriate supervisory authority in the EU (https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).