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GeorgiaInstitute
of Technology®
Office of Academic Effectiveness

EU General Data Protection Regulation Privacy Notice

This is the Georgia Institute of Technology's (Georgia Tech) Office of Academic Effectiveness' privacy and legal notice for compliance with the European Union General Data Protection Regulation ("EU GDPR"). The Office of Academic Effectiveness reports to the Office of the Provost. For more information regarding the EU GDPR, please review Georgia Tech's EU General Data Protection Regulation Compliance Policy.

Lawful Basis for Collecting and Processing of Personal Data

Georgia Tech is an institute of higher education involved in education, research, and community development. In order for Georgia Tech to assign students, faculty, and staff to Georgia Tech and third-party administered voluntary opinion surveys in order to help ensure the efficacy of Georgia Tech's overall academic effectiveness strategy (including academic assessment, program review and planning, and accreditation requirements and reporting) as well as voluntary Institutional climate assessment surveys (hereinafter, collectively, the "Programs and Activities"), it must collect, use and process this personal data.

The lawful basis for the collection and processing of personal data by Georgia Tech's Office of Academic Effectiveness falls under the following category:

- Processing is necessary for the purposes of the legitimate interests pursued by Georgia Tech or third parties in providing student, faculty, and staff opinion survey data for continuous educational and Institutional improvement.

Types of Personal Data Collected and Why

In order for Georgia Tech to provide the Programs and Activities, it needs to collect the following categories of personal data:

- Name
- Personal identifiers, biographical information and contact information (including email address and other location data) obtained from Georgia Tech records
- Details of your educational experience and/or employment opportunities (Career and Salary Survey)

The personal data collected by Georgia Tech's Office of Academic Effectiveness will be shared as follows:

Georgia Tech Unit	Purpose
Academic units on campus (academic advisors and other administrators on campus who interact with students within their respective College/School)	Review of student survey responses concerning academic programs for the purposes of educational improvements and to enrich the academic programs
Center for Career Discovery and Development (C2D2)	Review of graduating student survey responses concerning career and salary information
Institute Administrative (non-Academic) Units	Review of survey responses concerning Institute climate assessments and other unit-specific surveys
Office of Graduate Education	Review of exit survey responses concerning graduate and doctoral programs
Office of Undergraduate Education	Review of exit survey responses concerning undergraduate programs

Institute Diversity, Equity & Inclusion	The administration and review of surveys concerning Institute diversity, equity and inclusion engagement and programming
Enrollment Management Division	To support the Office of Undergraduate Admission, the Registrar's Office, the Office of Scholarships and Financial Aid, the Office of Special Scholarships, the Office of Strategy and Enrollment Planning and other offices as they assist students through the process of admission, being awarded financial aid, and continuing enrollment
Division of Student Life	Review of student survey responses concerning academic programs for the purposes of educational improvements and to enrich the academic programs

The Office of Institutional Research and Planning and the Office of Enterprise Data Management are responsible for the development, maintenance and storage of data resources to support the strategic planning and policy-making processes at Georgia Tech, and data is shared with these offices.

Third-Party Name	Purpose
Survey Administration platforms	Administration of surveys to GT students
Indiana University (National Survey of Student Engagement through the Center for Postsecondary Research)	Administration of surveys to GT students for educational improvement
University of California, Los Angeles (CIRP Freshman Survey)	Administration of surveys to GT students for educational improvement through the Cooperative Institutional Research Program

Georgia Tech is a unit of the Board of Regents of the University System of Georgia (the "BOR"), and data is shared with the BOR and its employees.

FERPA

The Family Educational Rights and Privacy Act (FERPA) provides that "Directory Information" is information not generally considered harmful or an invasion of privacy if disclosed. Directory Information is considered public information, but the categories of information that comprise Directory Information also comprise "personal data" under the EU GDPR. Please review Georgia Tech's definition of Directory Information for further information, including how to prohibit the release of Directory Information.

Where Georgia Tech gets Personal Data and Special Categories of Sensitive Personal Data

Georgia Tech receives personal data and special categories of sensitive personal data from multiple sources. Most often, Georgia Tech gets this data directly from the data subject or under the direction of the data subject who has provided it to a third party (for example, application for undergraduate admission to Georgia Tech through use of the Common App).

Individual Rights of the Data Subject under the EU GDPR

Individual data subjects covered by Georgia Tech's EU General Data Protection Regulation Compliance Policy will be afforded certain individual rights.

> **Note: Exercising of these rights is a guarantee to be afforded a process and not the guarantee of an outcome.**

Any data subject who wishes to exercise any of the above-mentioned rights may do so by filling such request with the Office of Enterprise Data Management at eugdpr@edm.gatech.edu

Cookies

Cookies are files that many websites transfer to users' web browsers to enable the site to deliver personalized services or to provide persistent authentication.   For information related to how Georgia Tech uses cookies, refer to Georgia Tech's Privacy and Legal Notice.

Security of Personal Data subject to the EU GDPR

All personal data and special categories of sensitive personal data collected or processed by Georgia Tech under the scope of the Georgia Tech EU General Data Protection Regulation Compliance Policy must comply with the security controls and systems and process requirements and standards of NIST Special Publication 800-171 as set forth in the Georgia Tech Controlled Unclassified Information Policy.

Georgia Open Records Act

As a state university, Georgia Tech is subject to the provisions of the Georgia Open Records Act (ORA). Except for those records that are exempt from disclosure under the ORA, the ORA provides that all citizens are entitled to view the records of state agencies on request and to make copies for a fee. The ORA requires that Georgia Tech produce public documents within three business days. For more information on Georgia Tech's ORA compliance, please visit the Open Records Act page on the Legal Affairs website.

Data Retention

Georgia Tech follows the guidelines specified in the University System of Georgia Records Retention Schedules. Applicable record categories include but are not limited to:

- Research

Notwithstanding, Georgia Tech's Office of Academic Effectiveness has a legitimate business need to permanently retain the data it collects as "the preservation of those historical records that document institution decision-making over time and that provide the history of the institution and the state." See FAQ "What are the objectives of a records and information management program?" at https://www.usg.edu/records_management/faq/

If a data subject refuses to provide personal data that is required by Georgia Tech in connection with one of Georgia Tech's lawful bases to collect such personal data, such refusal may make it impossible for Georgia Tech to provide education, employment, research or other requested services.

If the EU GDPR applies to the collection of your personal data and you have specific questions regarding the collection and use of your personal data, please contact the Office of Enterprise Data Management at eugdpr@edm.gatech.edu