

## Tulane University Privacy Policy

### For Data Protected by the European Union General Data Protection Regulation

**Effective Date: May 25, 2018**

**Last Updated: May 25, 2018**

#### Introduction

*We respect your privacy and are committed to protecting it through our compliance with this policy.* This Privacy Policy describes how we at Tulane and Tulane’s Schools, Centers, and other Tulane units and affiliates (collectively, “**we**” or “**Tulane**”) collect, use, and share the Personal Information that we gather by any means, including hardcopy (such as, paper applications or forms) and electronic means (such as, websites, mobile apps, and other digital properties), that are owned and operated by Tulane and that link to, reference, or apply to this Privacy Policy (collectively, the “**Services**”).

All Tulane Schools, Centers, and other Tulane units and affiliates may run and maintain their own websites on either the tulane.edu domain or organization-specific domains. These sites may carry their own privacy notices or provide additional information relating to their activities, which will supersede or supplement this Privacy Policy. For further information about Tulane’s web presence, please see <https://tulane.edu/privacy>.

If you have any questions about this Privacy Policy or our information practices, please contact us using the options provided below.

**Please read this Privacy Policy carefully. By using our Services, you consent to the information practices and other terms set forth in this Privacy Policy.**

#### How We Collect and Use Personal Information

When we use the term “**Personal Information**,” we mean information that can be used to identify you as an individual person. We collect several categories of Personal Information through our Services, including information you provide, information collected automatically (potentially including location information), and information we obtain from third party sources.

We generally use the Personal Information that we collect to operate the various functions of this institution and provide the Tulane services that may be available to you.

We rely on separate and overlapping bases to process your Personal Information lawfully. By way of example only, it may be necessary for us to process your Personal Information in certain ways in order to process a transaction you have requested or otherwise in accordance with a contract between us, or in certain cases we may process your Personal Information as necessary to conduct Tulane’s legitimate interests, when those legitimate interests are not overridden by your rights and interests.

The ways in which we collect and use your information vary depending on the relationship between you and Tulane, as well as the specific Tulane function with which you interact. The following sub-sections of this Privacy Policy are intended to describe in more detail our collection and use practices for a number of these relationships and functions.

Website

Tulane collects Personal Information you provide, for example, when you enter the information into form fields on our Services. As is true of most digital platforms, we also gather certain information automatically when you use our Services. For example, we and our vendors may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<p><b>Contact Information</b></p> <p>including your name, home address, email address, phone number, and birthdate</p>	<p>To respond to requests for information from you and communicate with you</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Log Files</b></p>	<p>To maintain the security of our Services, for fraud detection, and to protect our rights</p>	<p>Legitimate interests</p>

including IP addresses, browser type, device type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data		
<b>Cookies, Analytics and Related Technologies</b>  For more information, please see the “Cookies” portion of this policy, below.	To manage our Services and email messages and to collect and track information about you and your activities online over time and across different websites and social media channels for marketing purposes	Legitimate interests  Your consent, if applicable
<b>Location Information</b>  We may use your IP address to identify the general geographic area from which you are accessing Tulane.edu.	To conduct analytics to improve the Services, track user trends, and create custom audience lists. We connect data from different systems but do not link IP addresses to any personal information.	Legitimate interests  Your consent, if applicable

Admissions & Financial Aid

The information collected by us, or on our behalf, during the admissions process and throughout any subsequent enrollment as a student at Tulane is collected for the primary purpose of considering your application for admission to Tulane, evaluating your eligibility for financial aid and, if you are admitted, facilitating your education. For example, we may collect:

<b><i>Category of Personal Data</i></b>	<b><i>Purposes of Processing</i></b>	<b><i>Legal Bases for Processing</i></b>
<b>Contact Information</b>  including your name, home address, email address and phone number	To respond to requests for information from you and communicate your application status and decision; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests

		Your consent, if applicable
<b>Demographic Information</b> including race, ethnicity, gender, age, and marital status	To evaluate the application process and provide you with information regarding diversity initiatives and engagement opportunities; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Education History</b> including your prior schools, transcripts, school activities, and disciplinary records	To evaluate your eligibility for admission and participation in certain Tulane courses; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Testing History</b> including standardized testing	To evaluate your eligibility for admission and participation in certain Tulane courses; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests

		Your consent, if applicable
<b>Personal History</b> including interests, extracurricular activities, and recommendations	To evaluate your eligibility for admission; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Employment History</b> including job title, location, and work experience	To evaluate your eligibility for admission; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Criminal Record</b> including your self-reported and public record	To evaluate your eligibility for admission; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests

		Your consent, if applicable
<b>Person Financial Information</b> including tax identification number, wages, scholarships and grants, and family support	To evaluate your eligibility for financial aid; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Family Financial Information</b> including family member names, ages, occupations, wages, and savings	To evaluate your eligibility for financial aid; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable

### Alumni

The main way Tulane collects and maintains personal information about alumni is when you provide it to us, for example, when you update your alumni profile, connect with us on social media, or register to attend alumni events. We may also collect personal information from publicly available sources or third party sources that support Tulane.

The main purpose for Tulane’s collection of alumni personal information is to connect you with Tulane and other alumni. For example, we may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<p><b>Contact Information</b></p> <p>including your name, home address, email address and phone number</p>	<p>To respond to requests for information from you and communicate relevant alumni information and events; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Employment Information</b></p> <p>including your title, employer, location, and work experience</p>	<p>To connect you with alumni and students in similar employment fields and provide ongoing employment guidance; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Tulane Affiliations</b></p> <p>including your academic records, group memberships, and Tulane-related correspondence</p>	<p>To provide an accurate academic record to you upon request and connect you with alumni and students with similar academic records and interests; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p>

		Your consent, if applicable
<b>Personal Information</b> including personal interests, religious affiliation, and political affiliation	To connect you with alumni and students with similar interests, religious affiliations and political affiliations; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Family Information</b> Including family member names, ages, occupations, and relevant medical information	To provide other alumni and students with information you wish to share and provide family support during alumni events; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable

### Donors

Tulane collects and maintains personal information about donors to process your donation and respond to your comments and questions. We may also use your information to keep you informed about Tulane events and initiatives that we think may interest you.

The main way we collect personal information about you is when you give it to us, for example, when you complete a donation form or request information regarding donations. We may also collect personal information from publicly available sources or third party sources that support Tulane. For example, we may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<b>Contact Information</b> including your name, home address, email address and phone number	To provide confirmations of donations, respond to requests for information from you and provide you with information regarding Tulane events and initiatives; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Payment Information</b> including your payment card number, bank account number, and routing number	To process your donations	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable

Human Resources

Tulane collects your personal information when you apply for employment. Further personal information collection occurs at the commencement and throughout your employment at Tulane.

The personal information collected by Tulane, or on our behalf, is collected for the primary purpose of providing employment or enabling authorized persons to utilize Tulane’s services and facilities. For example, we may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
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<p><b>Contact Information</b></p> <p>including your name, home address, email address and phone number</p>	<p>To provide employment-related notices, forms and payments</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Payment Information</b></p> <p>including your bank account number and routing number</p>	<p>To process direct deposit payments</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Tax Information</b></p> <p>including tax identification number, wages and filing status</p>	<p>To process your tax withholdings and file required forms with tax authorities</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legal compliance</p>

		<p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Employment History</b></p> <p>including prior employers, titles, wages, work experience, and disciplinary record</p>	<p>To evaluate your application for employment and assess qualification for promotions and raises</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Education History</b></p> <p>including prior schools, transcripts, awards, honors and disciplinary records</p>	<p>To evaluate your application for employment</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Criminal Records</b></p> <p>including self-reported records and publicly available records</p>	<p>To evaluate your application for employment</p>	<p>To process transactions requested by you and meet our contractual obligations</p>

		Legitimate interests
		Your consent, if applicable

Online Education

Tulane collects your personal information when you apply for online education offerings. Further personal information collection occurs at the commencement of and throughout your online education interactions.

The personal information collected by Tulane, or on our behalf, is collected for the primary purpose of providing online education courses and, if applicable, evaluating qualification for online education certificates and credit. For example, we may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<b>Contact Information</b> including your name, home address, email address and phone number	To register you for courses and communicate with you regarding your program enrollment; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Payment Information</b> including your payment card, bank account number and routing number	To process payment for program registration; to respond to records requests	To process transactions requested by you and meet our contractual obligations

		<p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Tax Information</b> including tax identification number</p>	<p>To provide required information to tax authorities; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legal compliance</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Employment History</b> including prior employers, titles, wages, work experience, and disciplinary record</p>	<p>To evaluate your application for certain online education offerings; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>

<p><b>Education History</b></p> <p>including prior schools, transcripts, awards, honors and disciplinary records</p>	<p>To evaluate your application for certain online education offerings; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Criminal Records</b></p> <p>including self-reported records and publicly available records</p>	<p>To evaluate your application for certain online education offerings; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Learner Interaction Data</b></p> <p>including profile information, blog posts and community posts</p>	<p>To publish your messages to the online education platform; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>

<p><b>Course Assessment Data</b></p> <p>including assignment responses, test scores, and course interactions</p>	<p>To evaluate your success in the online education offering; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Log Files</b></p> <p>including IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data</p>	<p>To evaluate your engagement with the course, maintain the security of our Services, detect fraud, and protect our rights</p>	<p>Legitimate interests</p>
<p><b>Cookies, Analytics and Related Technologies</b></p> <p>For more information, please see the “Cookies” portion of this policy, below.</p>	<p>To evaluate your engagement with the course, manage our Services, and communicate program offerings to you</p>	<p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Location Information</b></p> <p>including latitude, longitude, date and time (the precision of this data varies greatly and is determined by factors controlled by your device or mobile service provider)</p>	<p>To offer you certain location-based services, such as delivering advertisements that are relevant to your particular location, and to conduct analytics to improve the Services</p>	<p>Legitimate interests</p> <p>Your consent, if applicable</p>

<p><b>Biometric Data</b></p> <p>Including facial and eye movement</p>	<p>To provide secure, remote webinar platforms for online courses</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
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Research

Tulane researchers and affiliates may collect, use, and share your personal information as part of a research study in which you have agreed to participate as a research subject or researcher, or in which your existing personal data are used. Often, when personal data are collected for research purposes, you will be provided a consent and/or authorization form that explains the types of data collected and the purposes for which such data are processed and shared. In such a case, the description of the collection and use of your personal information provided in the consent and/or authorization form will replace the information provided here.

Examples of data that may be collected for research purposes are listed below. These data categories are provided as examples only; not every research study will collect each of these categories of data. If you have questions about the processing of your data in connection with a research study, you should contact the Tulane personnel who are conducting the research or the contact persons named in any informed consent form you signed when you joined the study.

Tulane also maintains separate policies that govern the conduct of research by Tulane faculty and students. You can learn more about Tulane’s research policies at <http://www2.tulane.edu/asvpr/ora/policies.cfm>. Specific research departments may also have their own policies.

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
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<p><b>Contact Information</b></p> <p>including your name, home address, email address and phone number</p>	<p>To enroll you in a particular research study as a research subject or to administer the study if you are a researcher</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Tax Information</b></p> <p>including tax identification number</p>	<p>To report earnings from research participation as a research subject or researcher to the tax authorities</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legal compliance</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Family Information</b></p> <p>including family members, ages, occupations, and health</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p>

		<p>Legitimate interests</p> <p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>
<p><b>Employment History</b> including prior employers, titles, wages, work experience, trade union membership, and disciplinary record</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or</p>

		historical research purposes or statistical purposes
<b>Education History</b> including prior schools, transcripts, awards, honors and disciplinary records	To conduct research and improve understanding in fields of academic research	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Criminal Records</b> including self-reported records and publicly available records	To conduct research and improve understanding in fields of academic research	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Demographic Information</b> including race, ethnicity, gender, age, education, profession, occupation, income level, and marital status	To conduct research and improve understanding in fields of academic research	To process transactions requested by you and meet our contractual obligations  Legitimate interests

		<p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>
<p><b>Health Records</b></p> <p>including doctor's records, surgical records, immunizations, and medications</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>

<p><b>Biometric Data</b></p> <p>including facial measurements, finger prints, and eye movement</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>
<p><b>Genetic Data</b></p> <p>Including genetic information obtained from your biological samples</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p>

		<p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>
<p><b>Log Files</b></p> <p>including IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>

Students

The information collected by us, or on our behalf, throughout your enrollment as a student at Tulane is collected for the primary purpose of facilitating your education at Tulane and providing the programs for which you are enrolled. For example, we may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
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<p><b>Contact Information</b></p> <p>including your name, home address, email address and phone number</p>	<p>To respond to requests for information from you and communicate academic-related announcements, including grades, tuition bills, and program offerings</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Education History</b></p> <p>including your prior schools, transcripts, school activities, and disciplinary records</p>	<p>To provide academic guidance and evaluate your eligibility for a degree</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Assignment and Testing History</b></p> <p>including course grades and standardized testing</p>	<p>To evaluate your eligibility for a Tulane degree</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>

<p><b>Health Records</b></p> <p>including doctor's records, surgical records, immunization records, vaccinations and medications</p>	<p>To provide you with health care and protect the health and safety of the student body</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Disability Information</b></p> <p>including physical and mental disabilities</p>	<p>To provide you with proper accommodations</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Dietary Information</b></p> <p>including allergies and food preferences</p>	<p>To provide proper dietary options at Tulane dining halls</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>

<p><b>Residential Information</b></p> <p>including personal preferences, security key card activity, facility monitoring and personal monitoring</p>	<p>To provide a safe and secure residential experience for all students</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Personal History</b></p> <p>including interests and extracurricular activities</p>	<p>To connect you with other students and alumni with similar interests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Employment History</b></p> <p>including job title, location, and work experience</p>	<p>To evaluate your eligibility for financial aid and provide assistance when needed</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>

<p><b>Criminal Record</b> including your self-reported and public record</p>	<p>To evaluate your compliance with the Student Code of Conduct and provide assistance when needed</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Personal Financial Information</b> including tax identification number, wages, scholarships and grants, and family support</p>	<p>To evaluate your eligibility for financial aid and file required forms with tax authorities</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legal compliance</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Family Financial Information</b> including family member names, ages, occupations, wages, and savings</p>	<p>To evaluate your eligibility for financial aid</p>	<p>To process transactions requested by you and meet our contractual obligations</p>

		Legitimate interests  Your consent, if applicable
<b>International Student and Scholar Information</b>  including visa status, citizenship, funding information, dependent information	To provide for issuance of government immigration documents for visas for international students, scholars, staff, faculty, and dependents, as well as comply with federal reporting requirements.	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable

### Patients

Tulane University Medical Group (“TUMG”) and its affiliates may collect certain information to facilitate the process of your becoming a patient for treatment by TUMG, such as your contact information, medical records, and insurance. When you first present for care by TUMG, you will generally be provided a separate notice of privacy practices that explains in more detail the types of data collected and the purposes for which such data are processed and shared by TUMG. That notice will be controlling regarding the data collected during the course of your treatment by TUMG. If you have additional questions about the processing of your data in connection with your becoming a patient with TUMG, you should contact the office from whom you are obtaining treatment.

<b><i>Category of Personal Data</i></b>	<b><i>Purposes of Processing</i></b>	<b><i>Legal Bases for Processing</i></b>
<b>Contact Information</b>  including your name, home address, email address and phone number	To notify you of upcoming appointments, process payments, and maintain health records	To process transactions requested by you and meet our contractual obligations

		<p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Health Records</b></p> <p>including doctor's records, surgical records, immunizations, medications, genetic testing information, and biometric information</p>	<p>To treat you</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For diagnosis and treatment</p>
<p><b>Family Information</b></p> <p>including family members, ages, occupations, and health</p>	<p>To treat you and maintain accurate health records</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p>

		<p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For diagnosis and treatment</p>
<p><b>Employment History</b></p> <p>including prior employers, titles, wages, work experience, trade union membership, and disciplinary record</p>	<p>To process insurance coverage and payment for treatment</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p> <p>For diagnosis and treatment</p>
<p><b>Demographic Information</b></p> <p>including race, ethnicity, gender, age, education, profession, occupation, income level, and marital status</p>	<p>To treat you and maintain accurate health records</p>	<p>To process transactions requested by you and meet our contractual obligations</p>

		<p>Legitimate interests</p> <p>Your consent, if applicable</p> <p>For diagnosis and treatment</p>
<p><b>Log Files</b></p> <p>including IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data</p>	<p>To notify you of upcoming appointments, process payments, and maintain health records</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>

Customers

Tulane collects and maintains personal information about those that purchase items, including but not limited to the use of Tulane campus space and other property, to facilitate purchases and respond to your comments and questions.

<b><i>Category of Personal Data</i></b>	<b><i>Purposes of Processing</i></b>	<b><i>Legal Bases for Processing</i></b>
<p><b>Contact Information</b></p> <p>including your name, home address, email address and phone number</p>	<p>To provide confirmations of transactions, respond to requests for information from you and provide you with information regarding Tulane property, events, and initiatives; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p>

		Legitimate interests  Your consent, if applicable
<b>Payment Information</b>  including your payment card number, bank account number, and routing number	To process your transactions	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable

### Information We Obtain from Third Party Sources

We may obtain certain Personal Information about you from third party sources, which we may use to serve our legitimate interests, comply with legal obligations, perform a contract, or in some cases, in accordance with your consent.

#### Partners and Service Providers

We use partners and service providers, such as payment processors and analytics providers, to perform services on our behalf. Some of these partners have access to Personal Information about you that we may not otherwise have (for example, if you sign up directly with that provider) and may share some or all this information with us. We use this information to administer the Services and conduct marketing and advertising campaigns, as well as to process transactions that you request.

#### Single Sign-On

Some of our Services allow you to register and login to our Services through a third-party platform. When you choose to login to our service through a third-party platform, you allow us to access and collect any information from your third-party platform account

permitted under the settings and privacy policy of that platform. We use this information to deliver this functionality and the Services to you.

### Supplemental Information

We may receive additional Personal Information from third-party sources, such as credit reference agencies and public databases, which we may append to existing personal information, such as email address verification. We may use this supplemental information to process transactions that you request and to prevent fraud, deliver relevant offers and advertising to you, and to improve our operations, Services, and our advertising and marketing campaigns.

### **Additional Uses of Personal Information**

In addition to the uses described above, including, but not limited to, under “Purposes of Processing” and “Information We Obtain from Third Party Sources,” we may use your Personal Information for the following purposes, which uses may under certain circumstances be based on your consent, may be necessary to fulfill our contractual commitments to you, and are necessary to serve our legitimate interest in the following operations:

- Conducting our operations, administering the Services, and managing your accounts;
- Contacting you to respond to your requests or inquiries;
- Processing and completing your transactions including, as applicable, course registration, order confirmation, enrollment in academic groups or other programs, processing payments for online purchases and course registration, and delivering products or services;
- Providing you with newsletters, articles, service alerts or announcements, event invitations, and other information that we believe may be of interest to you;
- Providing you with promotional information, offers, and other information that are personally tailored to your interests;
- Conducting market research, surveys, and similar inquiries to help us understand trends and needs of our users;
- Alerting you about a safety announcement;
- Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Information, our website or data systems; or to meet legal obligations;
- Enforcing our Terms of Use and other agreements; and,
- Sending you text messages or push notifications when you sign up for one of our messaging programs. These messages may be sent by automated means. You may opt out of a text message program by following the instructions in the **Managing Communication Preferences** section.

## **Legitimate Interests**

We rely on several legitimate interests in using and sharing your Personal Information. These interests include:

- improving and customizing the Services for you;
- understanding how the Services are being used;
- obtaining insights into usage patterns of the Services;
- exploring ways to develop and grow our operations;
- ensuring the safety and security of the Services;
- conducting research and improving understanding in fields of public interest and health; and
- enhancing protection against fraud, spam, harassment, intellectual property infringement, crime, and security risks.

## **Data Retention**

We will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy, subject to your right, under certain circumstances, to have certain of your Personal Information erased (see **Your Rights** below), unless a longer period is required under applicable law or is needed to resolve disputes or protect our legal rights.

## **How We Share and Disclose Personal Information**

We share your Personal Information with third parties only in the ways described in this Privacy Policy. We may share your Personal Information within our family of schools, centers, and other Tulane units and affiliates, with service providers and partners, and to comply with the law, protect health and safety, and enforce our legal rights.

## Service Providers

We share your Personal Information with third-party service providers who complete transactions or perform services on our behalf or for your benefit, such as:

- Payment and donation processing
- Marketing and analytics
- Processing employment applications
- Processing admissions applications

- Alumni outreach and engagement
- Event registration and coordination
- Course registration and coordination
- Course evaluations and assessments
- Research insights and analytics
- Performing human resources administration

### Affiliates

We may share your Personal Information with affiliated legal entities within our schools, centers, and other Tulane units and affiliates for purposes and uses that are consistent with this Privacy Policy.

### Partners

We may share your Personal Information with our partners for the purposes of administering programs and services, such as:

- Cross-registration for courses with other universities
- Study abroad at foreign universities
- Online education offerings through online platforms
- Joint research arrangements with other hospitals and universities
- Events with clubs and special interest groups

### Third-Party Mobile App Providers

With your knowledge and consent, the Services may gather and transfer your Personal Information, including location information, from and to other applications, functions and tools within your mobile device.

### Social Media Platforms

We may also use services provided by third parties (such as social media platforms) to serve targeted ads to you on third party platforms. We may do this by providing a hashed version of your Personal Information to the third party for matching purposes. For

more information, including on how to control your privacy settings and your ad choices, please see the “Cookies” portion of this policy, below.

#### Legal Process, Safety and Terms Enforcement

We may disclose your Personal Information to legal or government regulatory authorities as required by applicable law. We may also disclose your Personal Information to third parties as required by applicable law in connection with claims, disputes, or litigation; when otherwise required by applicable law; if we determine its disclosure is necessary to protect the health and safety of you or us; to enforce our legal rights; or to enforce contractual commitments that you have made.

#### **International Data Transfers**

Tulane may transfer your Personal Information within our family of schools, centers, and other Tulane units and affiliates and/or to the third parties discussed above. Your Personal Information may be transferred to, stored, and processed in a country other than the one in which it was collected.

If your Personal Information was collected or stored in the European Economic Area (“**EEA**”), we may transfer your Personal Information outside the EEA and when we do so, we rely on appropriate or suitable safeguards recognized under data protection laws.

#### Adequacy Decision

We may transfer your Personal Information to Andorra, Argentina, Canada (commercial organizations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the United States (limited to those transfers governed by the EU-U.S. Privacy Shield framework), and any other countries that the European Commission has approved as providing adequate protection to personal information.

#### Standard Contractual Clauses

The European Commission has adopted standard data protection clauses, which provide safeguards for personal information transferred outside of the EEA. We may use Standard Contractual Clauses when transferring Personal Information from a country in the EEA to a country outside the EEA. You can request a copy of our Standard Contractual Clauses by contacting us as set forth in the **Contact Us** section below.

### With Your Consent

In respect of certain cross-border personal data transfers, we will obtain your consent to transfer your Personal Information outside the EEA after first informing you about the possible risks of such a transfer.

### By Contract

We will transfer your Personal Information outside the EEA if the transfer is necessary to the performance of a contract between you and Tulane, or if the transfer is necessary to the performance of a contract between Tulane and a third party, and the contract was entered into in your interest.

### Additional Considerations

In addition, we may transfer your Personal Information outside the EEA if the transfer is necessary to establish, exercise, or defend legal claims, as well as if the transfer is necessary to protect your vital interests.

### **Children**

We do not intend to collect and we will not knowingly collect or solicit Personal Information online from children under the age of 13 or as defined by local legal requirements, except on Services specifically directed to children. For those Services, we follow applicable data protection laws with respect to children's privacy, as set forth in the additional disclosures posted within the relevant Service.

### **Your Rights**

We process all personal information in line with your rights, in each case to the extent required by and in accordance with applicable law (including in accordance with any applicable time limits and fee requirements).

### EEA-Specific Rights

Upon request, we will provide you with information about whether we hold any of your Personal Information along with any details required to be provided to you under applicable law. In certain cases, you may also have a right to:

- rectify any of your Personal Information that is inaccurate;

- to restrict or limit the ways in which we use your Personal Information;
- to object to the processing of your Personal Information;
- to request the deletion of your Personal Information, and
- to obtain a copy of your Personal Information in an easily accessible format.

To submit a request, please contact us as set forth in the **Contact Us** section below. We will respond to your request within a reasonable time.

You also have the right to withdraw your consent to our processing of your Personal Information, if our processing is solely based on your consent. You can do this by discontinuing use of the Services, including by closing all of your online accounts with us and contacting us as set forth in the **Contact Us** section below to request that your Personal Information be deleted. If, however, you provided consent in connection with participation in a research study, you should follow the instructions in the research consent form to withdraw your consent. If you withdraw your consent to the use or sharing of your Personal Information for the purposes set out in this Privacy Policy, you may not have access to all (or any) of the Services, and we might not be able to provide you all (or any) of the Services. Please note that, in certain cases, we may continue to process your Personal Information after you have withdrawn consent and requested that we delete your Personal Information, if we have a legal basis to do so. For example, we may retain certain information if we need to do so to comply with an independent legal obligation, or if it is necessary to do so to pursue our legitimate interest in keeping the Services safe and secure, or if deleting the information would undermine the integrity of a research study in which you are enrolled.

If you have any complaints regarding our privacy practices, you have the right to lodge a complaint with your national data protection authority (i.e., supervisory authority).

## **Cookies**

This portion of the policy explains how Tulane and our business partners and service providers use cookies and similar technologies in the course of managing and providing our Services. It explains what these technologies are and why we use them, as well as your rights to control our use of them.

In some cases we may use cookies and other tracking technologies described in this Policy to collect Personal Data, or to collect information that becomes Personal Data if we combine it with other information.

### **What are cookies?**

Cookies are small data files that are placed on your computer or mobile device that allow us to collect certain information whenever you visit or interact with our Services. Cookies are widely used in order to, for example, make websites work properly, or work more efficiently, as well as to provide information to the owners of a website or online service. There are several types of cookies:

- Session cookies expire at the end of your browser session and allow us to link your actions during that particular browser session
- Persistent cookies are stored on your device between browser sessions, allowing us to remember your preferences or actions across multiple sites
- First party cookies are set by the site you are visiting
- Third party cookies are set by a third party site separate from the site you are visiting

### **Why do we use cookies and other tracking technologies?**

We use first party and third party cookies for several reasons. Some cookies are required for technical reasons in order for our Services to operate, and we refer to these as “essential” or “strictly necessary” cookies. Other cookies enable us and the third parties we work with to track and target the interests of visitors to our Services, and we refer to these as “performance” or “functionality” cookies. For example, we use cookies to tailor content and information that we may send or display to you and otherwise personalize your experience while interacting with our Services and to otherwise improve the functionality of the Services we provide. Finally, third parties serve cookies through our Services for advertising, analytics, and other purposes. This is described in more detail below.

### **Cookies served through our Services**

The specific types of first and third party cookies served through our Services and the purposes they perform are described in further detail below:

#### *Essential Cookies*

These cookies are strictly necessary to provide you with services available through our Services and to use some of their features, such as access to secure areas. Because these cookies are strictly necessary to deliver the Services, you cannot refuse them without impacting how our Services function.

#### *Performance and Functionality Cookies*

These cookies are used to enhance the performance and functionality of our Services but are non-essential to their use. However, without these cookies, certain functionality may become unavailable.

#### *Analytics and Customization Cookies*

These cookies collect information that is used to help us understand how our Services are being used or how effective our marketing campaigns are, or to help us customize our Services for you in order to enhance your experience.

#### *Advertising (Targeting) Cookies*

These cookies are used to make advertising messages more relevant to you and your interests. They also perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed, and in some cases selecting advertisements that are based on your interests. For more information, see the **Targeted online advertising** section below.

### **Other tracking technologies**

We and our third-party partners may use other, similar technologies from time to time, like web beacons, pixels (or “clear gifs”) and other tracking technologies. These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Services, or in the case of web beacons, opened an email that we have sent them. This allows us, for example, to monitor the traffic patterns of users from one page within our Services to another, to deliver or communicate with cookies, to understand whether you have reached our Services from an online advertisement displayed on a third-party website, to serve targeted advertisements to you and others like you, to improve site performance, and to measure the success of marketing campaigns. While you may not have the ability to specifically reject or disable these tracking technologies, in many instances, these technologies are reliant on cookies to function properly; accordingly, in those instances, declining cookies will impair functioning of these technologies.

### **Targeted online advertising**

We work with a variety of advertisers, advertising networks, advertising servers, and analytics companies (“**Ad Partners**”) that use technologies to collect data about your use of our Services (such as pages visited, ads viewed or clicked on) as well as your IP address, device identifier, or mobile advertising identifier, in order to deliver relevant advertising.

These technologies may include the placement on our Services of cookies or web beacons, and other tracking technologies (as described in the **Data We Automatically Collect** section of our [Privacy Notice](#)) by these Ad Partners to track how our Services are being used, to track where users go and what they do after their leave our Services, and to link various devices you may use, and to serve you more relevant ads. These advertisements may appear on our Services or other services that you visit.

In addition, our Ad Partners use the information collected by the technologies on our Services for purposes such as (a) in conjunction with advertising that appears on our website or other websites, (b) to report website traffic, statistics, advertisement data and other interaction with ads and the websites on which they are served, and (c) to measure the effectiveness of web-based and email ads. Please note that this Policy does not cover the practices of our Ad Partners.

For more information about how Ad Partners use the information collected by the technologies on our Services and your options to opt out of such collection, please visit <http://www.aboutads.info/choices/>. You may also opt out of additional third party advertising networks by going to the Network Advertising Initiative's [website](#) and following the directions.

The opt-outs described above are device- and browser-specific and may not work on all devices. If you choose to opt-out through any of these opt-out tools, this does not mean you will cease to see advertising. Rather, the ads you see will just not be based on your interests.

### **How can you control cookies and similar technologies?**

**Browser Controls:** Most web browsers allow some control of most cookies through the browser settings. For more information about how to reject, disable or delete cookies, please review your browser's help menu or visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). If you choose to reject cookies, you may not be able to take advantage of certain features, services, applications or tools available through the Services that are only available through the use of these technologies.

**Disabling Most Targeted Online Advertising:** As discussed above, advertising networks offer you a way to opt out of targeted online advertising. If you would like to find out more information, please visit <http://www.youronlinechoices.com>.

You can opt out of having your mobile advertising identifiers used for certain types of targeted online advertising, including those performed by us, by accessing the settings in your mobile device and following the instructions.

**Do Not Track:** Some Internet browsers, such as Internet Explorer, Firefox, and Safari, include the ability to transmit “Do Not Track” or “DNT” signals. Since uniform standards for “DNT” signals have not been adopted, our Services do not currently process or respond to “DNT” signals. We take privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard. To learn more about “DNT”, please visit [All About Do Not Track](#).

### **Links to Third Party Sites and Social Media**

The Services may include links to websites and digital services operated by third parties. This Privacy Policy does not apply to, and we are not responsible for the content, privacy policies, or data practices of third parties that collect your information. We encourage you to review the privacy policies for those third parties to learn about their information practices.

The Services may feature “like” buttons and widgets hosted by other companies. These features may collect your IP address, which page you are visiting on our Service, and may set a cookie to enable the feature to function properly. The loading, functionality, and your use of the plugins are governed by the privacy policy and terms of the third party that provided the plugin.

The Services may also allow you to log in using a social network or other third-party account. An example of a third-party login is “Log in with Facebook.” Logging into one of our Services with your social network or other third-party account may allow us to gather information that you give us permission to access from that social network or third party. The login feature may also transfer information to the social network or third party, such as your username and password, to authenticate you. The social network or third party may also automatically collect information such as your IP address, information about your browser and device, and the address of the web page you are visiting on our site. The login feature may also place and read cookies from that third party that may contain a unique identifier the social network or other third party assigns to you. The functionality of and your use of the login is governed by the privacy policy and terms of the party that provided the login functionality.

### **User Generated Content**

Some of our Services may enable users to submit their own content for courses, assignments, contests, blogs, videos, and other functions. Unless otherwise indicated, please remember that any information you submit or post as user-generated content to the Services become public information. You should exercise caution when deciding to disclose your personal, financial, or other information in such submissions or posts. We cannot prevent others from using such information in a manner that may violate this Privacy Policy, the law, or your personal privacy and safety. We are not responsible for the results of such postings.

## Updates to the Privacy Policy

This Privacy Policy is subject to occasional revision, and if we make any material changes in the way we use your Personal Information, we will notify you by sending you an email to the last email address you provided to us and/or by prominently posting notice of the changes on the Services and updating the effective date above.

Any changes to this Privacy Policy will be effective upon the earlier of thirty (30) calendar days following our dispatch of an email notice to you or thirty (30) calendar days following our posting of notice of the changes on the Services. These changes will be effective immediately for new users of our Services.

Please note that at all times you are responsible for updating your Personal Information to provide us with your most current email address. In the event that the last email address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the email containing such notice will nonetheless constitute effective notice of the changes described in the notice.

If you do not wish to permit changes in our use of your Personal Information, you must so notify us prior to the effective date of the changes and discontinue using the Services. Continued use of our Services, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

## Managing Communication Preferences

If you have opted in to our marketing (or when permitted by law, if you have provided us with your contact information), we may send you email messages, direct mail, push notifications, or other communications regarding educational offerings or other products and services, depending on the method of communication selected. You may ask us not to do so when you access our websites or mobile applications, or change your preferences by updating any accounts you have with us. At any time, you may elect to discontinue receiving messages about these offerings, products, or services from us by submitting an opt-out request to the contact information below or by following the unsubscribe instructions in the form of the communication you received, as described below.

### Printed Materials

To opt out of receiving printed materials about our offerings, products, or services at your postal address, such as magazines, advertisements, flyers or postcards, please write to us at the address set forth in the **Contact Us** section below. Please be sure to

include your name, mailing address, and description of the marketing material received exactly as they appear on the printed marketing materials you received.

### Emails

To opt out of receiving communications about our offerings, products, or services via email, please send an unsubscribe request to the email address set forth in the **Contact Us** section below or click on the unsubscribe link at the bottom of the email that was sent to you and follow the directions on the resulting web page. Please note that you may continue to receive certain transactional or account-related electronic messages from us.

### Text Messages

If you have consented to receive text messages, you may opt out of receiving them by using the method provided in the text message or by contacting us as set forth in the **Contact Us** section below.

### Push Notifications

To opt out of receiving push notifications, please set your preferences within your device setting menu.

### **Contact Us**

If you have any questions, comments, requests or concerns about this Privacy Policy or other privacy-related matters, you may contact our Data Protection Officer, Mark Liggett.

**Data Protection Officer: Mark Liggett**

**Email: [miliggett@tulane.edu](mailto:miliggett@tulane.edu)**