

## **Privacy Notice for Rabb School**

The Rabb School of Continuing Studies at Brandeis University ("Rabb") is committed to safeguarding the privacy of personal data. This Privacy Notice outlines the collection, use, and disclosure of personal information provided to the University by students, faculty, and applicants for matriculation or for faculty positions. When information is submitted to Rabb, or you use the University's websites and other services, you consent to the collection, use, and disclosure of that information as described in this Privacy Notice.

### **University Use of Information**

Rabb collects and processes Information and Sensitive Information from individuals who are students only as necessary in the exercise of the University's legitimate interests, functions and responsibilities as a private research higher education institution. Rabb also collects and processes Information from individuals who are applicants for faculty positions in order to enter into or administer a contract for employment with the University. Information is collected from students (and from their parents where appropriate) and shared with internal and external parties to register or enroll persons in the University, provide and administer housing to students, manage a student account, provide academic advising, develop and deliver education programs, track academic progress, analyze and improve education programs, recruitment, regulatory reporting, auditing, maintenance of accreditation, and other related University processes and functions. Rabb also uses Information and Sensitive Information to conduct general demographic and statistical research to improve University programs.

Sensitive Information is collected, processed and shared internally and externally, as necessary, applicable and appropriate, to identify appropriate support services or activities, provide reasonable accommodations, enforce University policies or comply with applicable laws. Finally, Information and Sensitive Information may be shared by Rabb with third parties who have entered into contracts with the University to perform functions on behalf of the University, subject to the obligation of confidentiality and safeguarding from unauthorized disclosure.

For purposes of this Privacy Notice, Sensitive Information is defined as race, ethnic origin, religious or philosophical beliefs, health data, sexual orientation, and criminal convictions.

For purposes of this Privacy Notice, Information refers to any other information concerning a natural person that is created by or provided to Rabb from or concerning student applicants, students, applicants for faculty employment and employed faculty and from parents of students and student applicants where appropriate.

### **Third Party Use of Sensitive Information**

In addition to the personal information you provide on an application, or as part of the application process, we also maintain and use data that is generated through your use of our

systems. We use and maintain your academic information (class enrollments, grades, degrees, honors, etc.) and student account and financial aid information (billing, tuition charges, scholarships, loans, and payments) as well as maintaining data on how you use related systems such as Latte, sage, Slate, and PowerFaides. We do not sell your data to others. We do not provide it to third parties for marketing purposes, except for services directly related to Brandeis activities.

We may disclose your Sensitive Information and other Information as follows:

- **Consent:** We may disclose Sensitive Information and other Information if we have your consent to do so.
- **Emergency Circumstances:** We may share your Information, and Sensitive Information when necessary to protect your interests and you are physically or legally incapable of providing consent.
- **Employment Necessity:** We may share your Sensitive Information when necessary for administering employment or social security benefits in accordance with applicable law or any applicable collective bargaining agreement, subject to the imposition of appropriate safeguards to prevent further unauthorized disclosure.
- **Charitable Organizations:** We may share your Information with the Brandeis Office of Institutional Advancement and other not-for-profit organizations in connection with charitable giving subject to the imposition of appropriate safeguards to prevent further unauthorized disclosure.
- **Public Information:** We may share your Information and Sensitive Information if you have manifestly made it public.
- **Archiving.** We may share your Information and Sensitive Information for archiving purposes in the public interest, and for historical research, and statistical purposes.
- **Performance of a Contract:** We may share your Information when necessary to administer a contract you have with the University.
- **Legal Obligation:** We may share your Information when the disclosure is required or permitted by international, federal, and state laws and regulations.
- **Service Providers:** We use third parties who have entered into a contract with the University to support the administration of University operations and policies. In such cases, we share your Information with such third parties subject to the imposition of appropriate safeguards to prevent further unauthorized disclosure.
- **De-Identified and Aggregate Information:** We may use and disclose Information in de-identified or aggregate form without limitation.

## Security

We implement appropriate technical and organizational security measures to protect your information when you transmit it to us and when we store it on our information technology systems.

## Cookies and Other Technology

The University's use of cookies and other data from information technology can be found in the Privacy Notice on the University's [Website](#).

## **Retention and Destruction of Your Information**

Your information will be retained by the University in accordance with applicable state and federal laws. Your information will be destroyed upon your request unless applicable law requires destruction after the expiration of an applicable retention period. The manner of destruction shall be appropriate to preserve and ensure the confidentiality of your information given the level of sensitivity, value and criticality to the University.

## **Your Rights**

You have the right to request access to, a copy of, rectification, restriction in the use of, or erasure of your information in accordance with all applicable laws. The erasure of your information shall be subject to the retention periods of applicable state and federal laws. If you have provided consent to the use of your information, you have the right to withdraw consent without affecting the lawfulness of the University's use of the information prior to receipt of your request.

Students may exercise these rights by accessing your student account maintained by the University's information technology systems using their login credentials, or by contacting the University's Registrar, Mark Hewitt, at [mhewitt@brandeis.edu](mailto:mhewitt@brandeis.edu). Applicants for programs in Rabb should address their questions to [rabb@brandeis.edu](mailto:rabb@brandeis.edu). Applicants for employment as faculty or faculty themselves may exercise these rights by accessing their account created in the University's information technology systems, or by contacting [Frances Stearns](#) in Graduate and Professional Studies, [Katherine Veach](#) in Precollege Programs or [Phil Dolan](#) in Summer School.

Information created in the European Union will be transferred out of the European Union to the University. If you feel the University has not complied with applicable foreign laws regulating such information, you have the right to file a complaint with the appropriate supervisory authority in the European Union.

## **Updates to This Policy**

We may update or change this policy at any time. Your continued use of the University's website and third party applications after any such change indicates your acceptance of these changes.

*Last updated: 5/31/18*