

## DATA PRIVACY NOTICE FOR STUDENTS IN THE E.U.

This Notice describes the practices of Fairleigh Dickinson University (“FDU”) with respect to the collection, use, storage, and disclosure (“processing”) of Personal Information of students while studying at Wroxton College. This Notice applies to FDU, with headquarters at 1000 River Road, Teaneck NJ 07666, including our colleges, schools and campuses (collectively “FDU,” “us” or “our”). All students, regardless at which institution they may be matriculated at, studying at Wroxton College (referred to below as “you” or “your”) should carefully read the provisions of this Privacy Notice.

“Personal Information,” as used in this Notice, means any information that can be used to identify you, whether directly or indirectly, including by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

<b>Questions?</b>	<p>You can contact FDU’s Data Protection Officer (DPO) with any questions about this notice, our data collection practices, or your rights. You can reach the DPO, Nicholas D.J. Baldwin, PhD, at:</p> <p>Wroxton College c/o Data Protection Officer’s Office Wroxton, Nr. Banbury Oxfordshire OX15 6PX England</p> <p>Phone from US: 011-44-1295-730551 Fax from US: 011-44-1295-730059 Or eMail to: <a href="mailto:DPO@FDU.EDU">DPO@FDU.EDU</a></p> <p>This general notice may be supplemented by additional notices at the point of any data collection. If you have specific questions about any of the data processing activities described in this or any other notice, please contact the DPO.</p>
<b>The Information We Process About You</b>	<p>We process the information we collect from you directly, including when you apply to study abroad, during our communications with you, when you sign up for classes or other services, when you take classes, when you apply for financial aid, and when you make use of FDU equipment, facilities, and resources. This includes information about you created by our faculty and staff, like your grades, scores, records of attendance and participation, and recorded observations about you. It also includes information about your payments made to us for tuition and other expenses.</p> <p>In some cases, we will require that certain information be provided in order for us to provide you with a service or take an action you request. We will indicate when such information is required, and failure to provide</p>

	<p>required information may result in our being unable to provide you with a service or take a requested action.</p> <p>We use automated decision-making processes to process your data in certain contexts. For example, we may automatically evaluate your grades or test scores to determine your eligibility for enrollment in certain programs, receipt of certain honors, or to provide you with offers of academic support. Similarly, the information in your financial aid application may be used to generate a profile of your financial circumstances that is used to make decisions about your eligibility for scholarships, loans, and other financial assistance throughout your enrollment at FDU. You can find out more about the logic we use in our automated decision-making processes by contacting the DPO.</p> <p>In addition, we collect the following kinds of information about you from third parties:</p> <ul style="list-style-type: none"> <li>- Information we collect from other students or FDU staff: Other students may provide us with information about you, whether in the process of reporting an incident or complaint on campus or alerting us to an emergency situation involving you. This information can include your name, information about your behavior or activities, and other information about the situation being reported to us.</li> <li>- Information about your prior or concurrent educational history, which we collect from other educational institutions (or from our own records in the event of a re-enrollment or enrollment for a different degree).</li> <li>- Health, wellness, and insurance information about you that we receive from healthcare providers and/or insurance companies.</li> <li>- Any criminal convictions or offenses, which we collect from third parties who provide us with such information such as criminal convictions, taxpayer identification confirmation.</li> <li>- Legal, financial, employment information provided to us by third parties as part of such third parties request for information from us. [e.g., wage garnishments, divorce proceedings]</li> </ul> <p>FDU maintains video surveillance systems for the security of our premises. FDU or our contracted service operator may process images and video of you in connection with the operation of these systems.</p>
<p><b>Purposes and Legal Basis for</b></p>	<p>We process your Personal Information to operate FDU and the programs you are enrolled in, to provide you with financial aid, and to provide you</p>

**Processing Your Data**

with additional related services (like housing, internet access, and health services). These uses include to:

- manage university billing, collecting, refunding and cashiering functions,
- provide desktop and software support services,
- administer programs and make decisions about course offerings,
- facilitate class diversity,
- monitor trends within our student body and individual courses,
- verify your identity,
- ensure that the university is prepared for emergencies,
- enforce FDU policies and applicable laws,
- file required reports with applicable governmental authorities,
- provide immigration and mobility services for you when you travel abroad to study, and
- facilitate student directory and promotional activities.

We combine the data that we collect in order to provide these functions.

We have the following legal bases for processing the information you provide us or that we collect about you:

- We have a legitimate interest in retaining and educating qualified students, complying with laws and regulations that govern our conduct in the countries where we operate, and administering FDU and its programs in an efficient, ethical, and appropriate manner. We process all the information we collect from or about you to meet these purposes.
- During the period of your enrollment, we may be required to process your Personal Information to complete contracts that you have entered into with us, including to be admitted to a program or receive financial aid, housing, or another service from us.
- We may be required to process your Personal Information to comply with laws applicable in the European Union or its member states, such as immigration laws.

In the case of Sensitive Personal Information (which includes (i) information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; (ii) genetic and biometric data, and (iii) data concerning health, sex life, or sexual orientation), we process this information only where (i) we have your explicit consent to do so, (ii) it is necessary to provide health care services to you, or (iii) we are required to process the information to comply with applicable laws. For example, we may ask you to provide us with information about food allergies so that we can ensure the provision of

	<p>appropriate meals to you. We may share food allergy information with vendors who provide us with catering services.</p> <p>When we process your Sensitive Personal Information on the basis of your consent, you may withdraw that consent at any time by contacting the DPO. If you withdraw your consent, we may still be required to process your Sensitive Personal Information to comply with applicable law, but we will explain to you at the time your consent is withdrawn what processing activities will continue for legal compliance purposes.</p> <p>Finally, we process your Personal Information for additional purposes that are compatible with those already described, including for the purposes of conducting scientific, statistical, or historical research or for the purpose of creating archives in the public interest. Where possible, we do not use identifiable information for these purposes, or we take steps, including making use of pseudonymous data, to limit the amount of Personal Information we use in our research or archives.</p>
<p><b>Recipients of Your Personal Information</b></p>	<p>Your Personal Information will be received and processed by FDU employees and personnel, including third parties who provide services to FDU in connection with the purposes of processing described above. For example, we may disclose your information to service providers who help us make travel arrangements, support our information technology systems, or provide services to our students. We share your Personal Information with our service providers only when they have agreed to process your Personal Information only to provide services to us and have agreed to protect your Personal Information from unauthorized use, access, or disclosure.</p> <p>We also disclose your information to government authorities as required by laws that regulate immigration, tax, compliance reporting, national security, and criminal activity.</p>
<p><b>Transfers to Third Countries</b></p>	<p>FDU is an international university headquartered in the United States, and we may transfer your Personal Information to the United States. FDU has adopted a policy reflecting EU requirements that governs the transfer of Personal Information from the EU to the United States. If you would like to receive a copy of FDU’s policy on international data transfers, you can contact the DPO.</p>
<p><b>Data Retention</b></p>	<p>You can find more information about how long we retain Personal Information by consulting our [Record Retention Policy, available here: (<a href="http://view2.fdu.edu/legacy/fdurecordsretentionpolicyfinal.pdf">http://view2.fdu.edu/legacy/fdurecordsretentionpolicyfinal.pdf</a>), and the retention schedules are available here: (<a href="http://view2.fdu.edu/legacy/fdurecordsretentionschedulesfinal.pdf">http://view2.fdu.edu/legacy/fdurecordsretentionschedulesfinal.pdf</a>)]. In</p>

	<p>some cases, we may be required by law to retain your information for a longer period.</p>
<b>Your Rights</b>	<p>You have the right to the following information regarding FDU's processing of your Personal Information:</p> <ul style="list-style-type: none"><li>• the purposes of the processing,</li><li>• the categories of Personal Information concerned,</li><li>• the recipients or categories of recipients to whom the Personal Information have been or will be disclosed,</li><li>• where possible, the envisaged period for which the Personal Information will be stored, or, if not possible, the criteria used to determine that period.</li></ul> <p>This Privacy Statement is intended to provide this information. Any questions about these details may be directed to the DPO.</p> <p>You also have the following additional rights with respect to your Personal Information processed while a student at our Wroxton campus:</p> <ul style="list-style-type: none"><li>• The right to request access to the Personal Information that FDU has about you, as well as the right to request rectification of any data that is inaccurate or incomplete.</li><li>• The right to request a copy of your Personal Information in electronic format so that you can transmit the data to third parties, or to request that FDU directly transfer your Personal Information to one or more third parties.</li><li>• The right to object to the processing of your Personal Information for marketing and other purposes.</li><li>• The right to erasure of your Personal Information when it is no longer needed for the purposes for which you provided it, as well as the right to restriction of processing of your Personal Information to certain limited purposes where erasure is not possible.</li><li>• The right to lodge a complaint with the UK data protection authority:</li></ul> <p style="text-align: center;"><b>Information Commissioner's Office</b> Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p> <p style="text-align: center;"><b>Tel:</b> 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number</p> <p style="text-align: center;"><b>Fax:</b> 01625 524 510</p>

	<b>Website:</b> <a href="https://ico.org.uk/">https://ico.org.uk/</a>
--	---