

Data Privacy Notice For European Union

Fairleigh Dickinson University Employees

This Notice describes Fairleigh Dickinson University’s practices with respect to the collection, use, storage, and disclosure (“processing”) of Personal Information of employees at Wroxton College and who may be otherwise within the European Union. 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”), solely with respect to employees at Wroxton College and who may be otherwise in the European Union. All such employees (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.

Questions?	<p>You can contact FDU’s Data Protection Officer with any questions about this notice, our data collection practices, or your rights. You can reach the DPO, 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: DPO@FDU.EDU</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>
The Information We Process About You	<p>We process the information we collect from you directly, either during our communications with you, when you apply for employment, when you sign up for employment benefits, or when you make use of FDU equipment and systems, facilities, programs, resources, and FDU services provided by third-party vendors. This includes information about your employment history with FDU, your job performance, compensation and benefits, and your dependents and emergency contacts.</p> <p>In some cases, we may require certain information from you to provide you with a service or benefit. Failure to provide that information may mean we cannot provide you with a service or benefit.</p>

	<p>We use automated decision-making processes to process your data in certain contexts. For example, we may automatically evaluate information about your compensation and benefits to withhold taxes or determine your eligibility for employee benefits or other programs. 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"> • Information about your employment history and education: We collect information about your employment history and education during the application process or when taking an employment action – such as considering you for a promotion or a new position at FDU. We collect this information from your previous employers and the educational institutions you attended. • Information about your professional certifications: We collect information about any professional certifications you might have from third parties that provide or verify those certifications. • Information about your health: We may collect information about your health from your health care provider or another third party you direct us to in order to provide necessary accommodations, including appropriate meals. • Information we collect from other employees or students: Other employees or students may provide us with information about you, whether in the process of reporting an incident on campus, alerting us to an emergency situation involving you, or as part of the employment process. This information can include your name, information about your behavior or activities, and other information about the situation being reported to us. • Immigration information: Governments and consulates may provide us with government identification, immigration information, or other information in order to facilitate travel related to your employment at FDU. The type of information provided may vary by country depending on applicable reporting requirements.
<p>Purposes and Legal Basis for Processing Your Data</p>	<p>We process your Personal Information to administer and manage FDU programs and services, administer, manage, and evaluate your employment with FDU, communicate with you regarding your employment, and provide you with access to FDU programs, services, and facilities. We also use data to make strategic decisions about FDU programs or course offerings, administer those programs, file required reports with applicable</p>

governmental authorities, and engage in financial planning. We also use your data for purposes required by law, including complying with application retention requirements, and for the enforcement of FDU policies and applicable laws

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

We have the following legal bases for processing your Personal Information:

- We have a legitimate interest in hiring and retaining qualified employees, 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. You can obtain additional information about the legitimate interests we have in processing your information by contacting the DPO.
- We may be required to process your Personal Information to fulfill our obligations pursuant to a contract of employment or an agreement to receive certain other benefits. You can obtain additional information regarding processing we do to enter into contracts with you by contacting the DPO.
- We may also be required to process your Personal Information to comply with applicable laws, such as UK employment laws. You can obtain additional information about the processing we do to comply with applicable laws by contacting the DPO.

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 information either (i) because we have your consent to do so or (ii) because we are required to process the information to comply with applicable laws. You can obtain more information about these laws by contacting the DPO. 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.

Finally, we process your Personal Information for additional purposes that are compatible with those already described, including for the purposes of

	<p>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>Recipients of Your Personal Information</p>	<p>Your Personal Information will be received and processed by FDU employees, students, and personnel, including third parties who provide services to FDU in connection with the purposes of processing described above, like payroll and benefits service providers, technology providers that support FDU’s systems and infrastructure, and other vendors acting on our behalf. 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. You may contact the DPO to learn more about the categories of service providers to whom your data is disclosed.</p> <p>We may also disclose your contact information at FDU in staff and faculty directories available to FDU students, employees, and the general public. You may request that your information be removed from these directories.</p> <p>We may provide your information to other universities or entities to facilitate joint activities, including travel, collaborative events, professional affiliations, and research.</p> <p>We also disclose your information to government authorities as required by laws that regulate immigration, tax, national security, and criminal activity. We may disclose your information, as necessary, in the course of judicial or administrative proceedings.</p> <p>Finally, we may disclose your Personal Information where necessary to protect your safety, FDU’s rights and safety, or the rights and safety of one or more third parties.</p>
<p>Transfers to Third Countries</p>	<p>FDU is headquartered in the United States and has campuses in England, China and Canada. We transfer your data to the United States and to the countries where we have established physical and virtual campuses and other operations. Data that is collected about you by the FDU site at which you are employed may be shared with our headquarters in the United States and other sites during the period of your employment in order to facilitate central management of FDU’s programs and administer FDU’s global operations.</p> <p>FDU has adopted a policy reflecting EU requirements that governs the transfer of Personal Information from the EU to the United States. If you</p>

	would like to receive a copy of FDU’s policy on international data transfers, you can contact the DPO.
Data Retention	You can find more information about how long we retain Personal Information by consulting our [Records Retention Policy, available here: (http://view2.fdu.edu/legacy/fdurecordsretentionpolicyfinal.pdf), and the retention schedules are available here: http://view2.fdu.edu/legacy/fdurecordsretentionschedulesfinal.pdf]. We may be required by law to retain your information for a longer period, for example if we are engaged in litigation or similar legal action which requires the University to preserve certain records. If you have any questions, you may contact the DPO.
Your Rights	<p>You have the right to the following information regarding FDU’s processing of your Personal Information:</p> <ul style="list-style-type: none"> • the purposes of the processing, • the categories of Personal Information concerned, • the recipients or categories of recipients to whom the Personal Information have been or will be disclosed, • where possible, the envisaged period for which the Personal Information will be stored, or, if not possible, the criteria used to determine that period. <p>This Data Privacy Notice 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:</p> <ul style="list-style-type: none"> • 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. • 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. • The right to object to the processing of your Personal Information for marketing and other purposes. • 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. • The right to lodge a complaint with the supervisory authority in the country where you live or work or where you believe that your rights have been violated. The UK data protection authority is: <p style="text-align: center;">Information Commissioner's Office</p>

	<p>Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p>
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Fax: 01625 524 510

Website: <https://ico.org.uk/>