

Grand Valley State University
STUDY ABROAD PRIVACY NOTICE AND CONSENT
GDPR Privacy Notice and Request for Consent

THE EUROPEAN UNION GENERAL DATA PROTECTION REGULATION (GDPR)

The European Union General Data Protection Regulation, or GDPR (EU 2016/679), is a regulation concerning the collection, protection and processing of personal data provided by an individual ("data subject") while in a European Union Member State, regardless of citizenship or residency. **Therefore, the terms and conditions contained in the Regulation and detailed in this Notice only apply while an individual is physically present in one of the EU Member States.** Complete information is available on the [European Commission](#) website.

PRIVACY NOTICE

Grand Valley State University continues to be committed to conducting the collection and processing of personal data with integrity and in compliance with applicable data protection laws. This Privacy Notice, required under the GDPR, presents information about how the University collects, uses and protects personal data you provide as a student.

A. Data Controller Contact Information

Grand Valley State University serves as the Data Controller and determines the purposes and means of processing your personal data. The individual below serves as the primary contact for GDPR compliance related to the Padnos International Center's international education opportunities and is responsible for responding to questions about this Notice and requests to exercise a data subject's rights.

Mark Schaub
Padnos International Center
Chief International Officer
130 Lake Ontario Hall
schaubm@gvsu.edu
(616) 331-3898

B. Purposes for Collecting and Using Data

The Padnos International Center (PIC) needs to keep certain personal data to fulfil its purpose of providing outstanding service to students, and to meet its obligations in facilitating the study abroad home university processes.

With regards to study abroad, the Padnos International Center may be required to prepare documents for students to obtain a visa, prepare a home school nomination, confirm flight, and in-country travel arrangements for a faculty-led program, and facilitate the signing of financial aid consortium agreements to allow for access of home institution financial aid, to name just a few common tasks.

Notification of Data Held and Processed

- The Padnos International Center uses an online platform called OASIS which provides information on GVSU study abroad programs, and links to services; OASIS hosts the study abroad application information required for all applicants in order for PIC to evaluate an applicant's qualifications for study abroad. The OASIS system also hosts various capabilities to allow the Padnos International Center to collect required documents, and track applications. Additionally, the Padnos International Center keeps hard copies of some materials in each student's file.
- Personal information such as name, address, email address, major/minor, gender, GPA, Gnumber, class standing, residency status, and telephone number is collected by pulling data from GVSU's MyBanner system. Once students log into the study abroad OASIS system, we are able to communicate with them about individual programs and pre-departure planning.
- Emergency Contacts - We collect names and contact information from participating students so that if there is a reasonable need to communicate with these contacts that PIC staff will be able to do so. Examples of such incidents include hospitalization or incapacitation of the student, criminal arrest or detention, or similar emergencies.

When students pay application deposits in OASIS, the University processes the credit card information into a secure database. Once payment is processed electronically by a secure credit card processing service, the credit card information is deleted.

The Padnos International Center believes in individuals' rights to find out what information is collected and stored about you. This applies to data held on electronic or paper storage systems. Individuals have the right to know what information is being collected; however, if an individual waives the right to view the faculty recommendation, the contents of the recommendation will not be disclosed.

C. Sharing and Transferring Data

Padnos International Center will not share your personal information with unaffiliated third parties without your permission or consent. Third parties we may share information with might include: the Consulate or Embassy of the country you plan to study in, a study abroad provider you are working through, a local organization who may be making arrangements on your behalf, and/or your host university.

The Padnos International Center will make available information from its database for the support of approved, university-related activities. The following statements specify the acceptable internal uses of information from the Padnos International Center database:

Financial Aid

- To confirm the estimated cost of attendance for study abroad programs.
- To verify financial need and financial aid eligibility for the purpose of grant and scholarship reviews.
- To coordinate services to facilitate the study abroad process such as early check release, or financial aid deferment requests.

Student Accounts

- All study abroad charges must be communicated to Student Accounts.

Fellowships

- For purposes of notifying students of scholarship or fellowship opportunities.

Counselling Center

- Notification of students going abroad to improve efforts in advising students on important issues such as taking medications abroad, confirming there is adequate support at the host institution, stress management techniques, etc.

Faculty Directors

- Faculty who are appointed to lead a study abroad program overseas will have access to a student's application and post-acceptance documents through the OASIS system.

Information maintained in OASIS will not be released for nonrelated commercial or political purposes.

D. Data Retention

Data is retained in accordance with University policy and as required under applicable U.S. laws and regulations. The Padnos International Center will keep some forms of information for longer than others. Most data collected in the student's file will be shredded at the time the transfer of credit is completed. This usually takes place 3-4 months after a student returns from study abroad, but this time frame does vary from student to student, and varies based on the program. For faculty-led programs, physical copies of student information is shredded within three years of the completion of the program.

The data stored in our online system will remain for data tracking and reporting purposes. Each year, the Padnos International Center submits aggregate data to a national organization (IIE.org) for the Open Doors data. No personally identifiable information is provided, but we do report data on gender, major/minor, length of study abroad, location of study abroad, year in school, and ethnicity.

E. Sensitive Data

With regards to study abroad, the Padnos International Center may be required to prepare documents for students to obtain a visa, prepare a home school nomination, confirm flight, and in-country travel arrangements for a faculty-led program, verify financial aid funding, and facilitate the signing of financial aid consortium agreements to allow for access of home institution financial aid, to name just a few common tasks.

F. Rights of the Data Subject

While in the EU you will be able to exercise your rights as a data subject described in Article 15-22 of the GDPR: right of access to your personal data, right to correct that data, right to have the data erased, right to restrict processing, right to data portability, right to object to processing, right to withdraw consent, the right not to be subject to automated decision-making, and the right to lodge a GDPR-related complaint with an EU Supervisory Authority. Please note that the University is subject to federal and state laws, including but not limited to the Family Educational Rights and Privacy Act, that may require that we request, process and retain and report on certain types of data. These legal obligations may also affect actions we would be permitted to take in response to a request to exercise your GDPR data rights, especially the right to have your data erased.

G. Importance of Data

Without a complete study abroad application, the Padnos International Center is unable to provide home school approval for a student to study abroad. Home school approval is often required by host

institutions, study abroad providers, and the host country embassy or consulate. Additionally, students will not be able to access federal financial aid through Grand Valley State University since aid eligibility is dependent on a student maintaining their registration status at the home institution. Registration approval is only given for students who have received home school approval to study abroad.

H. Data Protection

The University has put in place reasonable physical, technical and administrative safeguards designed to prevent unauthorized access to or use of information collected online.

In the event that we become aware of a breach of data from an unauthorized user or entity, PIC will contact individuals using the @mail.gvsu.edu email account as quickly as possible.