**MODEL PRIVACY NOTICE AND COOKIES NOTICE REGARDING European Union’s General Data Protection Regulation**

**Notice of Collection and Use of Personal Data**

The University of Tennessee (“UT”) may be a data “controller” or “processor” with regard to certain activities as defined under the European Union’s General Data Protection Regulation (“EU GDPR”). UT is committed to protecting the rights of individuals in compliance with the GDPR. You are notified that by [DESCRIBE YOUR PROCESS, SUCH AS: VISITING THIS WEBSITE, COMPLETING THIS FORM, CONTINUING THROUGH THIS PROCESS, SIGNING UP FOR THIS SERVICE, ETC.], UT is collecting certain personal data about you. UT is collecting this personal data in order to [PROCESS YOUR APPLICATION FOR, SIGN YOU UP FOR, AND/OR PROVIDE THE SERVICE, EVENT, OR PROGRAM DESCRIBED].

**Data Protection Officers**

UT has Data Protection Officers for each campus and institute and its system administration:

* UT Knoxville: Joel Reeves, Associate Vice Chancellor and CIO
* UT Chattanooga: Dr. Richard Brown, Executive Vice Chancellor for Administration and Finance
* UT Martin: Edie Gibson, Executive Assistance to the Chancellor
* UT Health Science Center: Melanie Burlison, Assistant Vice Chancellor for Compliance and Special Projects
* UT Institute of Agriculture: Sandy Lindsey, Chief Information Security Officer
* UT Institute for Public Service: Scott Gordy, Chief Information Security Officer
* UT Foundation: Michael Carter, Assistant Vice President of Advancement Services
* UT System Administration: Robert Ridenour, Chief Information Security Officer

These Data Protection Officers can be contacted at privacy@tennessee.edu.

**Lawful Basis for Collecting and Processing of Personal Data**

UT is an institution of higher education involved in education, research, and public service.  In order for UT to educate its students both in class and on-line, engage in research, and provide public service, it is essential, necessary, and UT has lawful bases to collect, process, use, and maintain data of its students, employees, applicants, research subjects, and others involved in its educational, research, and public service programs. The lawful bases include, without limitation, admission, registration, delivery of classroom, on-line, and study abroad education, grades, communications, employment, applied research, development, program analysis for improvements, and records retention. Examples of data that UT may need to collect in connection with these lawful bases are: name, email address, IP address, physical address or other location identifier, photos, as well as some sensitive personal data obtained with prior consent.

For more information regarding the EU GDPR, please review [PROVIDE LINK TO UT’S GDPR WEBPAGE].

Most of UT’s collection and processing of personal data will fall under the following categories:

* Processing which is necessary for the purposes of the legitimate interests pursued by UT or third parties in providing education, employment, research and development, and public service.
* Processing which is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
* Processing which is necessary for compliance with a legal obligation to which UT is subject.
* Processing for which the data subject has given consent for UT to use his or her personal data for one or more specific purposes.

There will be some instances where the collection and processing of personal data will be pursuant to other lawful bases.

**Types of Personal Data collected and how it will be used**

UT collects a variety of personal data to meet one of its lawful bases, as referenced above. Most often the data is used for academic admissions, enrollment, educational programs, job hiring, provision of medical services, participation in research, development, and public service. Data typically includes name, address, transcripts, work history, information for payroll, research subject information, medical and health information (for student health services, or travel), and donations. If you have specific questions regarding the collection and use of your personal data, please contact the Data Protection Officer for the applicable UT campus or institute as identified herein.

If a data subject refuses to provide personal data that is required by UT in connection with one of UT’s lawful bases to collect such personal data, such refusal may make it impossible for UT to provide education, employment, research, or other requested services.

**Where UT gets Personal Data**

UT receives personal data from multiple sources. Most often, UT gets this data directly from the data subject or under the direction of the data subject who has provided it to a third party (for example, application for admission to UT through use of the Common App).

**Rights of the Data Subject under the GDPR**

If you are an individual data subject under the GDPR, you may obtain the following information and exercise the following rights:

* the identify and the contact details of the controller and, where applicable, the controller’s representative;
* the contact details of UT’s Data Protection Officers;
* an explanation of the purposes and legal bases/legitimate interests of the data collection/processing;
* the identification of the recipients of the personal data;
* notice if UT intends to transfer personal data to another country or international organization;
* notice of the time period that the personal data will be stored;
* the right to access personal data, rectify incorrect personal data, erase personal data, restrict or object to processing, and the right to data portability;
* the right to withdraw consent at any time, if processing is based on consent;
* the right to lodge a complaint with a supervisory authority (established in the EU);
* an explanation of why the personal data are required, and possible consequences of the failure to provide the data;
* notice of the existence of automated decision-making, including profiling; and
* notice if the collected data are going to be further processed for a purpose other than that for which it was collected.

Any data subject who wishes to exercise any of the above-mentioned rights may do so by submitting such request to the Data Protection Officer for the applicable UT campus or institute as identified herein.

**Cookies**

Cookies are files that many websites transfer to users’ web browsers to enable the site to deliver personalized services or to provide persistent authentication. The information contained in a cookie typically includes information collected automatically by the web server and/or information provided voluntarily by the user.  Our website uses persistent cookies in conjunction with a third party technology partner to analyze search engine usage and web traffic patterns. This information is used in the aggregate to monitor and enhance our web pages. It is not used to track the usage patterns of individual users.

**Security of Personal Data subject to the EU GDPR**

UT is committed to ensuring the security of your information. We have put in place reasonable physical, technical, and administrative safeguards designed to prevent unauthorized access to or use of the information collected online. All personal data collected or processed by UT under the scope of the GDPR will comply with the security controls and systems and process requirements and standards as set forth in UT’s Information Technology Policies, which are available at <https://universitytennessee.policytech.com/?public=true&siteid=1>

**Sharing your information**

UT will not share your information with third parties except:

* as necessary to meet one of UT’s lawful purposes, including but not limited to:
	+ its legitimate interest,
	+ contract compliance,
	+ pursuant to consent provided by you,
	+ as required by law;
* as necessary to protect UT’s interests; or
* with service providers acting on our behalf who have agreed to protect the confidentiality of the data.

**Data Retention**

UT keeps the data it collects for the time periods specified in UT’s Records Retention Policy, which is available at <https://universitytennessee.policytech.com/dotNet/documents/?docid=35>

**Changes to this Privacy Notice**

UT may, in its discretion, periodically update this GDPR Privacy Notice.