

UWF Office of the Registrar GDPR Notice

Overview

This is the University of West Florida's (UWF) Office of the Registrar's privacy and legal notice for compliance with the European Union General Data Protection Regulation ("EU GDPR"). For more information regarding the EU GDPR, please review: <https://www.eugdpr.org/>, UWF's EU GDPR Privacy Notice at <https://uwf.edu/media/university-of-west-florida/offices/general-counsel/pdf/UWF-EU-GDPR-Privacy-Notice.pdf> and <https://uwf.edu/go/legal-and-consumer-info/general-data-protection-regulation-gdpr/>

Lawful Basis for Collecting and Processing of Personal Data

UWF is an institute of higher education involved in education, research, and community development. In order for UWF to enroll students in courses, issue grades, award degrees, and conduct other services related to enrollment and graduation, it must collect, use and process this personal data.

The lawful basis for the collection and processing of personal data by UWF's Office of the Registrar falls under the following categories:

- Processing is necessary for the purposes of the legitimate interests pursued by UWF or third parties in providing enrollment and readmission services for student education.
- The data subject has given consent to the processing of his or her special categories of sensitive personal data for one or more specific purposes.

Types of Personal Data collected and why

In order for UWF's Office of the Registrar to provide the enrollment services for student education as listed above, it needs to collect the following categories of personal data:

- Name
- Contact information including, without limitation, email address, physical address, phone number, and other location data
- Photographs of you
- Unique personal identifiers and biographical information (e.g. date of birth)
- Details of your education and/or employment qualifications
- Medical information including, without limitation, diagnosis
- Information related to visa requirements, copies of passports and other documents to ensure compliance with U.S. laws
- Information related to the prevention and detection of crime and the safety of employees, students and visitors of UWF
- Financial information gathered for the purposes of administering fees and charges, loans, grants, scholarships, etc.
- Information related to the prevention and detection of crime and the safety of employees, students and visitors of UWF.

The personal data collected by UWF's Office of the Registrar may be shared with University offices and academic departments for the purpose of academic planning, financial aid processing and student billing, scholarship awarding, visa processing and enrollment reporting/verification more specifically as follows:

UWF Unit	Purpose
Nautilus Card	UWF Student ID
ITS	
Academic Units on Campus	To support academic advising and to allow administrative staff and faculty within the academic units access to information they need to assist students make progress toward graduation.
Other enrollment service units on campus	To support the Admissions Offices, the Financial Aid Office, and other offices that assist students through the process of admission, being awarded financial aid, and continuing enrollment
Housing, Controller, Student Affairs, Disability Services, Nautilus Card, Library and Information Center, ITS	To provide the information needed for students to live in campus housing, pay tuition and fees, be supported by the Dean of Students Office, be supported under ADA for their disabilities, be supported in the classroom through coordination with facilities, receive health care on campus, be issued a student ID card for access to campus facilities, to access the Recreation Center, to utilize resources in the Library and ITS (Information Technology Services)

Third-Party Name	Purpose
Florida Board of Governors	Mandatory reporting for performance based funding and statutory requirements
National Student Clearinghouse	Enrollment and degree verifications, loan deferment
CollegeScheduler	Student registrations
SSC Campus	Academic advising, data analytics
NCAA Compliance Assistant	NCAA compliance requirements
Canvas	Online delivery or hybrid options for course offerings

Lawroom	Online training modules for compliance and workers
Cashnet	Billing portal for tuition and fees
ArgoPulse	Employee and student involvement with organizations
Parchment	Academic transcripts
Academic Partnerships	Online academic program recruitment and delivery
The Learning House	Online academic program recruitment and delivery
Third party contractors who provide services to students in relation to transcript orders and diplomas	

FERPA

The Family Educational Rights and Privacy Act (FERPA) provides that "Directory Information" is information not generally considered harmful or an invasion of privacy if disclosed. Directory Information is considered public information, but the categories of information that comprise Directory Information also comprise "personal data" under the EU GDPR. Please review UWF's definition of Directory Information in UWF Regulation 3.017, "*Student Educational Records*," for further information, including how to prohibit the release of Directory Information.

If you have specific questions regarding the collection and use of your personal data, please contact Matthew Packard, UWF Data Protection Officer, Office of Compliance and Ethics at eugdpr@uwf.edu

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

Where UWF gets Personal Data and Special Categories of Sensitive Personal Data

UWF receives personal data and special categories of sensitive personal data from multiple sources. Most often, UWF 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 undergraduate admission to UWF through use of the Common App). For any student who is submitting the application for readmission from an EU location, a consent form will also be required.

Individual Rights of the Data Subject under the EU GDPR

Individual data subjects covered by the EU GDPR will be afforded the following rights at UWF:

1. information about the controller collecting the data
2. the data protection officer contact information
3. the purposes and legal basis/legitimate interests of the data collection/processing
4. recipients of the personal data
5. if UWF intends to transfer personal data to another country or international organization
6. the period the personal data will be stored
7. the existence of the right to access, rectify incorrect data or erase personal data, restrict or object to processing, and the right to data portability
8. the existence of the right to withdraw consent at any time
9. the right to lodge a complaint with a supervisory authority (established in the EU)
10. why the personal data are required, and possible consequences of the failure to provide the data
11. the existence of automated decision-making, including profiling
12. if the collected data are going to be further processed for a purpose other than that for which it was collected

Note: Exercising of these rights is a guarantee to be afforded a process and not the guarantee of an outcome.

Any data subject who wishes to exercise any of the above-mentioned rights may do so by filling such request with Matthew Packard, UWF Data Protection Officer, Office of Compliance and Ethics at eugdpr@uwf.edu

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

All personal data and special categories of sensitive personal data collected or processed by UWF must comply with the security controls, systems and process requirements and standards of UWF Policy IT-04.01-03, University of West Florida Information Security and Privacy Policy.

Florida Public Records Law

As a state university, UWF is subject to the provisions of the Florida Public Records Law, as outlined in Chapter 119, Florida Statutes. Except those records that are exempt from disclosure under the Florida Public Records Law, the law provides that all citizens are entitled to view the records of state agencies on request and to make copies for a fee. **For more information on UWF's obligations under the Florida Public Records Law, please see UWF Policy GC-01.04-05/18.**

Data Retention

Please be informed that:

1. The period for which your personal data will be stored will be from now until no longer needed for compliance with U.S and Florida laws.
2. You can withdraw your consent, if granted, at any time and even only orally, but this will not affect the lawfulness of processing your personal data based on your consent before withdrawal.
3. You have legal rights and remedies against any breach of your personal privacy according to articles 77 to 84 of the EU GDPR.

UWF keeps the data it collects for the time periods specified in UWF Policy FIN 03.02-02.14, Records Management, as required under Florida Law.

*****DISCLAIMER:** The University of West Florida's Office of the Registrar may make amendments to this notice from time to time without prior notice by posting the revised notice to this site. The most recent version will be the most recent date in the *History* provided below.

History: November 2018.