

ADMISSIONS PRIVACY NOTICE FOR STUDENTS FROM THE E.U.

This privacy notice describes how the United States Institute of Leadership and Diplomacy, located at 6701 Baymeadow Dr., Ste B. MD 21060 USA (“we”, “us”, or “USILD Law”), collects and processes personal data relating to applicants (as defined below) who are in the European Union; how we use, store, transfer and protect this personal data; and your rights in relation to this personal data.

This privacy notice applies to all personal data we collect or process relating to applicants who are in the European Union, in the context of admissions and throughout the application and pre-matriculation process. For purposes of this privacy notice, “**applicant**” means:

- Past and present student applicants;
- Prospective students and recruits who interact with our admissions or other offices, employees, or associated third parties; and
- Parents, guardians, and other family members of exchange student applicants.

This notice will inform you of:

- [Personal data we collect and use;](#)
- [How we use your personal data and the basis on which we use it;](#)
- [Who has access to your personal data;](#)
- [How your personal data is protected and stored;](#)
- [International transfer of your data;](#)
- [How to exercise your rights;](#)
- [How to contact us;](#) and
- [Changes to the privacy notice.](#)

1. PERSONAL DATA WE COLLECT AND USE

Throughout the application process, we collect and use certain personal data about you. Personal data is information about you through which you can be identified (including where you can be identified by combining such information with other information).

Note that we may be required by law to collect certain personal data about you, or as a consequence of our relationship with you. Failure to provide this personal data may prevent or delay the fulfilment of these obligations. We will inform you at the time your personal data is collected whether certain data is compulsory and the consequences of the failure to provide such personal data.

1.1 Personal data we collect directly from you

We collect some personal data directly from you. Personal data that is collected directly from you includes or may include the following:

- a) Personal details, such as your full name, date of birth, and place of birth;
- b) Contact details, such as your phone number, email address, and mailing address;
- c) Demographic details, such as

- your age, gender, marital status, languages spoken, national origin, and current nationality;
- d) Identification numbers, such as your Social Security number or other government-issued identification number, and passport number;
 - e) Authenticating information, such as user names, passwords, and security questions and answers;
 - f) Passport and visa information;
 - g) Citizenship status;
 - h) Military or veteran status;
 - i) Information you submit in connection with your application for admission, including your personal essay, writing sample, study proposal, portfolio, academic transcripts, test scores, letters of recommendation, evaluations, application video, disciplinary records, information about prior applications, and information relating to academic dismissals;
 - j) Employment information, including your résumé, work history, and job title;
 - k) Information about your family, including the names of relatives who have attended USILD;
 - l) Information about your preferences, including those related to housing and academic and extracurricular interests;
 - m) Information about your native language, languages spoken, and your level of language proficiency;
 - n) Photographs for use in identification;
 - o) Your emergency contact details, such as names of your emergency contacts and their contact information and information about your next of kin;
 - p) How you heard about our programs;
 - q) Information about your computer and other devices, including your IP address, MAC address, and information about your browser and operating system; and
 - r) Communications you send us, including your requests and information provided by you in the form of feedback or complaints about the program, housing, or other matters.

a. Personal data generated by us

In addition, the following categories of personal data about you may be generated by Georgetown in the context of admissions and throughout the course of the application and pre-matriculation process:

- i. Student identification numbers, including USILD ID, NetID, and Applicant ID numbers;
- ii. Information about your computer and other devices, including your IP address, MAC address, and information about your browser and operating system;
- iii. Records of our interactions with you;
- iv. Internal notes, including notes about your application, admission decisions, alumni interviews and other admissions interviews; and
- v. Acceptance letters and enrollment confirmation.

b. Personal data we obtain from other sources

USILD may also obtain the following categories of personal data about you from third parties:

- i. Personal details and contact details (as described above), such as information you provide to school counsellors or third parties such as ETS or Keystone Academic;

- ii. Feedback, recommendations, or evaluations from your teachers or other individuals; and
- iii. Academic transcripts and language proficiency assessment results provided by other institutions or third party digital credential services.

c. Sensitive data we collect and use

Some of the categories of personal data that we collect are considered special categories of personal data under European Union law. In particular, we may process the following types of sensitive data:

- i. Health and medical information, including your medical history, physician's report, information about disabilities or related accommodations, information about allergies or dietary restrictions, and health insurance information; b) Information about your religious or philosophical beliefs; c) Information about your racial or ethnic origin; and d) Information about criminal charges and convictions. e) Information about sexual activities or misconduct

m) HOW WE USE YOUR PERSONAL DATA AND THE BASIS ON WHICH WE USE IT

USILD uses your personal data in connection with admissions and throughout the application and pre-matriculation process for the following purposes:

- Considering your application for admission. Our basis for doing so is the performance of the pre-contractual relationship we have with you;
- Reviewing applications and related information for purposes of making admissions determinations. This processing is necessary to serve our legitimate interests in selecting a diverse and qualified student body and in efficiently managing the application process.
- Identifying students, including creating a student identification card that includes your photo. This processing is necessary to serve our legitimate interests in keeping our campus and associated facilities safe and secure;
- Communicating with applicants throughout the application and pre-matriculation process. This processing is necessary to serve our legitimate interests in responding to applicant requests and efficiently managing the application process;
- Responding to emergencies, such as contacting you or your family in the event of an incident. This processing is necessary to serve our legitimate interests in supporting the health and wellbeing of our students;
- For purposes of program planning and development. This processing is necessary to serve our legitimate interests in the efficient management and administration of our academic programs and extracurricular activities;
- Keeping our campus and associated facilities safe and secure. This processing is necessary to serve our legitimate interests in protecting our students, property, and facilities;
- Complying with legal obligations to which we are subject, including to defend your and our rights in legal proceedings and to cooperate with regulators and law enforcement, governmental or competent bodies. This processing is necessary to comply with legal obligations and to serve our legitimate interests in complying with the laws to which we are subject; and

- Keeping our records accurate and up-to-date. This processing is necessary to comply with legal obligations and to serve our legitimate interests in efficient management and administration.

a. How we use sensitive data

- **Health and medical information.** To the extent we process health and medical information, we do so to comply with obligations under social protection laws (e.g., to provide disability accommodations) or, where not required by law, to provide medical services under the responsibility of authorized medical professionals or when such processing is necessary to protect the vital interests of you or another person. In some contexts, this information may be processed with your consent.

- **Information revealing an individual's racial or ethnic origin.** To the extent we process information revealing racial or ethnic origin, such information is voluntarily disclosed during the application process for purposes of statistical reporting related to diversity. We rely on express consent for such processing.

- **Information about an individual's religious or philosophical beliefs.** To the extent we process information about an individual's religious or philosophical beliefs, such information is voluntarily disclosed during the application process for purposes of statistical reporting relating to diversity. This information may also be voluntarily disclosed when submitting housing preferences. We rely on express consent for such processing.

- **Information about criminal charges and convictions.** To the extent we process information relating to criminal charges and convictions, we do so to the extent required and where permitted under applicable law. When processing this information, we do so to comply with our legal obligations or, where not required by law, to serve our legitimate interests.

n) WHO HAS ACCESS TO YOUR DATA

We treat your personal data with care and confidentiality. Your personal data will be available for the purposes mentioned above and only to employees on a need-to-know basis and to the extent reasonably necessary to perform their functions.

We may share your personal data with third parties under the following circumstances:

- Service providers and business partners. We may share your personal data with our service providers and academic or business partners that perform services for us. For example, we may partner with other companies or entities to provide services for you in relation to our academic programs, such as learning management system providers, information technology providers, and enrollment management providers.

- Law enforcement agencies, courts, regulators, government authorities or other third parties. We may share your personal data with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.

Because we operate internationally, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on

“International transfer of your data” below for more information.

o) HOW YOUR PERSONAL DATA IS PROTECTED AND STORED

We implement technical and organizational measures designed to ensure a level of security appropriate to the risk to the personal data we process. These measures are aimed at ensuring the ongoing integrity and confidentiality of personal data.

We will retain your personal data for as long as we have a relationship with you (throughout the duration of your studies and in many cases afterwards, as part of the alumni community). Once our relationship with you has come to an end, we may retain your personal data for a period of time that enables us to:

- Maintain academic records
- Comply with record retentions requirements under applicable law
- Defend or bring any existing or potential legal claims
- Resolve or otherwise address any complaints or queries relating to our programs

We will delete your personal data when it is no longer required for these purposes. If there is any information that we are unable to delete entirely from our systems for technical reasons, we will put in place appropriate measures to prevent any further processing or use of the data.

p) INTERNATIONAL TRANSFER OF YOUR DATA

Your personal data may be transferred to, stored, and processed in a country (such as the United States) that is not regarded as ensuring an adequate level of protection for personal data under European Union law.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your personal data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

q) HOW TO EXERCISE YOUR RIGHTS

Where applicable under local law, you may have the following rights regarding your personal data: the right to access personal data Georgetown holds, and in some situations, the right to have that personal data corrected or updated, erased, restricted, or delivered to you or a third party in a usable electronic format (the right to data portability). Where applicable, you may also object to how Georgetown uses your personal data if the legal basis for processing that information is our legitimate interest.

Where we are using your personal data on the basis of your consent, and where applicable under local law, you have the right to withdraw that consent at any time. You also have the right to register a complaint to the appropriate data protection authority, where applicable.

If you wish to exercise these rights, or to notify us of a change in your details, or if you have any questions on the content of this notice, please contact USILD Admissions at Customer-Relations@usild.edu

l) HOW TO CONTACT US

If you have questions or concerns regarding the way in which your personal data has been used, please contact us at Customer-Relations@usild.edu and include in your message the program you have applied to.

We are committed to working with you to obtain a fair resolution of any complaint or concern about your privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right (where applicable) to make a complaint to the appropriate data protection authority. Contact information for the EU data protection authorities can be found at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

m) CHANGES TO THE PRIVACY NOTICE

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time.

If we change this privacy notice, we will notify you of the changes. Where changes to this policy will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (for example, to object to the processing).

Last Updated: August 13, 2022