THE AMERICAN UNIVERSITY of PARIS 55 YEARS

PRIVACY POLICY
Website Users

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I. About this Policy

The American University of Paris ("AUP", "The University", "we", "our", "us") is committed to protecting the privacy and security of your personal information ("personal data").

This policy describes the ways we collect and use your personal data during your use of the AUP public website (www.aup.edu and www.aup.fr). This policy outlines how we address the responsibilities we hold in relation to the General Data Protection Regulation (GDPR) and related French and United States data protection laws.

It applies to all our public websites.

II. This Policy's Relation to Other Policies

Separate documents exist detailing how we use personal data for student applicants, job applicants, donors, alumni, and supporters, employees, and current students.

Additional personal data use policies will be furnished when you use certain services and facilities provided by the University.

Reading this policy and other privacy policies that we may furnish from time to time when we process your personal data is important so that you are familiar with how and why we use your personal data. This policy may be updated at any time.

III. Definitions

'Personal data' means any recorded information that is about you and that allows you to be directly or indirectly identified. Data which has been appropriately anonymized and suitably aggregated are not included in this definition because your identity has been definitively removed from the dataset.

'Processing' means anything that we do with your personal data, including its collection, its use in decision-making, its storage and maintenance, and its disclosure, deletion or retention.

IV. Who Uses Your Personal Data?

The American University of Paris is considered the "Data Controller" for the personal data processed in relation to this policy (i.e. data processed and concerning your use of our website). Being the "Data Controller" means that we decide how to use your personal data and are responsible for maintaining and using it in compliance with the GDPR and other data protection legislation.

Access to your personal data from the University website and other data covered under this policy is provided to staff who have a need to see as part of their work to fulfill the purposes described in section VI. It is also shared in certain cases with third parties described in section VII.

V. What Personal Data is Processed?

We may process the following personal data:

- technical information, for example, the type of device (and its unique device identifier) you use to access our site, the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, mobile network information and platform;
- information about your visit to our site including the full Uniform Resource Locators (URL), clickstream to, through and from the website (including date and time), pages you viewed, page response times, download errors, length of visits to

certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

VI. How the University Uses Your Data

The University uses your personal data for a variety of purposes, including:

- To understand who uses our website;
- To understand how our website is used;
- To improve our website and its security.

The purposes listed above are dependent upon various legal bases including:

1. *When we need to meet a legitimate interest*
   We base our processing of your website interaction data on our legitimate interests related to improving our online presence and ensuring the usability and security of our website.

2. *When we need to meet a legal obligation*
   Sometimes we may need to meet a legal obligation such as protecting the property and safety of our users. For example, we may keep connection logs. In this case, we may share your personal data with a third party, as described in section VII.

VII. Data Sharing with Third Parties and Entities Within and Outside the European Union and European Economic Area

In order to perform our duties based on our legal obligations or our legitimate interests, we occasionally may share some of your information with parties external to AUP. These third parties may include:

- Organizations that help us deliver services to you, including the website;
- Relevant Government Agencies.

When information is shared with third parties, we seek to limit the amount of data shared to just what is necessary.

Any third party that processes data on our behalf must demonstrate that they take measures to protect your data in compliance with the law and with our policies. We never allow them to use your personal data for their own purposes. The University only allows them to process your data for the specific purposes for which we have contracted their services and in accordance with our instructions.

Transfer outside of the European Economic Area - EEA (EU plus Norway, Iceland, and Lichtenstein)
Sometimes, we transfer your data outside the EEA. This may be done to communicate with your when we use a provider that is located outside the EEA, or for other reasons. In all such cases, we ensure that the following conditions are met:

1. Either the country to which the data is transferred is recognized by the EU as providing an adequate level of protection;

   OR

   The organization to which the data is transferred is covered by a scheme recognized by the EU as providing an adequate level of protection;

2. The transfer of personal data is governed by legally-binding contractual clauses between us and the organization receiving the information;

3. The transfer is based on one of the legal bases and is necessary:
   a. To meet the needs of a contract with you or a contract with another person which is in your interests;
   b. To protect the vital interests of you or another person;
   c. To fulfill legal obligations;
   d. To perform functions in the public interest;
   e. To perform functions in our legitimate interest;

   OR

The transfer has your explicit consent.

Transfers are typically limited situations where the transfer itself is not repeated.

VIII. Data Security and Retention

Your information and its security is important to us. As such, we have put into place multiple and appropriate measures and safeguards to protect your information.

In general, your data is kept for one year and can be archived for the applicable limitation period or the period necessary for us to meet any legal requirements.

IX. Third Party Websites

Our website contains links to third party websites, which have their own privacy policies. We are not responsible for any personal data you may submit to these websites.

X. Cookies

Our website uses cookies to tell you apart from other users of the website. This helps us improve the website. Please refer to BP030EN – Policy for Cookies & Similar Technologies for further information.

XI. Your Rights and Responsibilities

You have the right to:

- Request access to your data (commonly known as a "subject access request"). This enables you to receive a copy of your data and to check that we are lawfully processing it.
- Request correction of your data. This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- Request erasure of your data. This enables you to ask us to delete or remove your data under certain circumstances, for example, if you consider that there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).
- Object to processing of your data where we are processing it meet our public interest tasks or legitimate interests.
- Request the restriction of processing of your data. This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your data to another party, subject to the conditions of applicable data portability law.

Depending on your request and its nature, we may not be able to execute what you have asked. For example, when we have a statutory or contractual requirement to process your data and it would be impossible for us to fulfill those legal requirements should we stop processing. For example, we may maintain connection logs to combat fraudulent use of our systems.

When you have given consent for a certain type of processing, you can withdraw the consent at any time. When you withdraw consent, we will stop the processing concerned as soon as possible, however, withdrawing consent does not invalidate prior processing of the information.

XII. Who to Contact and How to Complain

If you want to exercise any of the rights above or you are unsatisfied with how we have processed your information, please contact the AUP Data Protection Oversight Committee at dataprotection@aup.edu. We will treat your request as soon as we can and may keep records of your communications with us to ensure we can resolve your request.

If you remain unsatisfied, you may lodge a complaint with the French *Commission Nationale de l'Informatique et des Libertés* (CNIL).

XIII. **Changes to this Policy**

This policy was last updated 24 June 2019. It is reviewed when necessary and at least once per year. Any changes will be published here and we will inform you of any substantive changes. Occasionally, we may also alert you in other ways about the processing of your data.