

Privacy Policy for Students from the European Union

Effective: 2019.February.01

The Universidad del Sagrado Corazón (Sagrado) is committed to protecting the personal information people provide us with, be it applicants, students, members of our faculty or visiting students. The Policy establishes the manner in which we at Sagrado receive, use and divulge said information. When a person provides information via a Sagrado representative, electronic mail or another medium controlled by the University, we are committed to acting responsibly, as described in this Policy, in the receipt, use and dissemination of information and sensitive information.

This document is published in compliance with the Family Educational Rights and Privacy Act (FERPA) as well as the *General Data Protection Regulation (GDPR) (EU) 2016/679*.

I. Definitions

1. *Records*: refers to the documents maintained by Sagrado that are directly related to the student not including:
 - Legal documents;
 - Records related solely with a student's matters;
 - Medical, psychological or medical treatment related records, which will only be shared with people related to said treatment;
 - Alumni records that have information on the activities of an alum.
2. *International or Foreign*: refers to a person that is not a citizen of the United States of America and is a citizen of a country that is a member of the European Union.
3. *Information*: refers to personal data provided to Sagrado about a specific individual.
4. *Sensitive information*: refers to ethnic origin, religious or philosophical beliefs, sexual orientation, union memberships, criminal, medical or academic records.

5. *Person with interest or user:*

- Foreigner who studies in a degree program in Sagrado;
- Foreign student who participates in the Student Mobility Program.

6. *Third:* refers to a party that is not the person with interest or user, Sagrado or a provider hired and authorized by Sagrado that needs to obtain access to the information or the sensitive information of the person with interest in order to provide the service for which it was hired.

II. Allowed Uses

Sagrado has agreements with foreign higher education institutions that promote collaboration, the development of student mobility programs and the exchange of faculty members. Sagrado promotes student mobility to encourage foreign students to study and obtain Associate, Bachelor and Masters' degrees as well as postgraduate certificates at Sagrado. To that end, Sagrado could request information and sensitive information for the following purposes (the list is not comprehensive).

- Information about the country of origin in order to facilitate the documents needed by the person with interest for the F-1 Visa.
- Sensitive information related to ethnic origin to share with federal and international authorities, in compliance with the applicable state, federal and international laws.
- Sensitive information about race, religion or philosophical beliefs could be requested to the person with interest and gathered by the Recruitment and Admissions Office in order to share it with certain academic or administrative units with the purpose of identifying activities, manage this Policy and provide support services.
- Sensitive information related to previous criminal activity by the person with interest could be gathered and shared with state, federal and international authorities in compliance with applicable laws.
- Information in support of an admissions process and the Student Mobility program. The information will be used to provide academic programs, monitor academic progress, offer medical services and, if needed, apply policies.
- Information and sensitive information could be used to perform statistical analysis in support of the improvement of academic programs, reports required by state and federal regulations, accreditation and other functions or University processes. This information can also be shared within academic or administrative units that have a legitimate interest in providing services and in compliance with the provisions of this Policy.

III. Information dissemination

Sagrado may share information or sensitive information with other people under the following circumstances:

1. Previous written consent: refers to occasions when the person with interest consents, in writing, to the dissemination of information or sensitive information.
2. Emergency situations:
 - When it is necessary to protect the person with interest, even without his or her consent;
 - When the person with interest is incapable (physically, emotionally, or legally) to provide consent;
 - When a situation could be dangerous for the person with interest or others and it is proven that time is of the essence and the information or the sensitive information is necessary in order for the person that requests the information or the sensitive information to intervene in the emergency situation.
3. Public information: refers to a situation where the person with interest has publicly shared the information or the sensitive information.
4. Contract administration: refers to situations where it is necessary to share the information or sensitive information of the person with interest in order to manage a contract between the person with interest and Sagrado.
5. Contracts with service providers: refers to situations where it is necessary to share information or sensitive information of the person with interest in order to comply with the contractual obligations Sagrado has with a service provider. Service providers are obligated to comply with the University's policies including respecting and safeguarding the privacy of the information or the sensitive information.
6. Judicial compliance: refers to situations where it is necessary to share the information of the sensitive information of the person with interest in order to comply with a legal obligation or requirement, as mandated by the laws of the Commonwealth of Puerto Rico and the United States of America.
7. Information aggregation: Information or sensitive information might be used and disseminated in an aggregated form so that the person or people with interest cannot be identified.

IV. Cookies

Cookies are text files that are stored in a computer system via an Internet browser. Cookies contain a cookie ID which is a unique identifier that allows the visited Internet sites and servers to identify the individual browsers. Sagrado's website uses cookies and similar

technologies to allow the University to promote its services and enhance the browsing experience. By using Sagrado's website, students agree to the University's use of cookies.

V. Information protection

The Integrated Information and Technology Unit (ITI) is responsible for the monitoring and implementation of appropriate security measures that will safeguard the information of all the individuals that use the University's information and technology systems to create, transmit and receive information or sensitive information. Knowing that no data transmission is 100% safe, ITI uses an SSL (*secure socket layer*) inscription to protect the data transmitted through the information and technology systems. The passwords utilized by users are encrypted so that only the user can access it. Users are responsible to keep their passwords in a safe place and not share it with third parties.

For more information about the security measures used by our ITI, please contact the Chief Information Officer at 787.728.1515, ext. 3571, or by electronic mail at luis.gotelli@sagrado.edu.

In the event of a security failure or breach, it shall notify the affected parties immediately after becoming aware of the problem and shall provide measures to correct said problem.

VI. Storage and destruction of information

Sagrado stores the information or sensitive information of the person with interest in compliance with the laws of the Commonwealth of Puerto Rico and the United States of America that regulate higher education institutions. The information or sensitive information belonging to a persona of interest will be destroyed when requested by the person of interest unless such destruction is not permitted until the expiration of the period required by law for the retention of documents. The manner in which these documents are destroyed has to guarantee the confidentiality of the information or sensitive information contained in said documents, according to the degree of sensitivity or value for Sagrado.

VII. Rights

The person with interest shall have the right to inspect, review, obtain copies, request recertification, restrict use or request the destruction of his or her information or sensitive information in compliance with the laws of the Commonwealth of Puerto Rico and the United States of America that apply to the institutions of higher learning; they shall do so by presenting a formal request to the Registrar's Office.

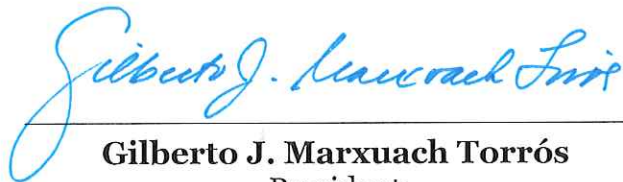
VIII. Reporting Violations

Violations to this Policy or consultations on the scope and interpretation of this Policy must be addressed to the Registrar's Office at 787.728.1515, ext. 3451, or by electronic mail at eigna.dejesus@sagrado.edu.

IX. Violations to this Policy

Universidad del Sagrado Corazón reserves the right to interpret this Policy in its administration, implementation and application. Any violation of this Policy by a student, faculty or staff or any other person may result in a disciplinary action that may include expulsion from the University (students) or termination of the employment relationship (faculty and administrative staff), or other appropriate legal actions.

If there is ambiguity in any provision of this Policy, the University reserves the discretion to interpret it according to the purpose for which it was established, the impact on the operations of the University, and good faith, unless any law provides otherwise.



Gilberto J. Marxuach Torrós
President