



## GDPR Privacy Notice

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### **Introduction**

At Florida Seminole Tourism (“FST”), we are committed to safeguarding the privacy of personal data. This privacy notice explains how FST processes your personal data, and your rights in relation to the personal data we hold.

FST is the data controller of your personal data and is subject to the European Union General Data Protection Act (the “GDPR”) in so far as your data was provided to FST while you were located in the European Union. For more information on whether the GDPR applies to your personal data, please see <https://www.eugdpr.org/>.

### **Scope**

This privacy notice applies to all data subjects, as defined below, whose personal data is collected by FST, while the data subject is located in the European Union. European Union Member States include: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, and United Kingdom. If you were located in any of these European Member States at the time you provided FST with your personal data, this privacy notice will apply to you.

Further, this privacy notice applies to all GDPR affected data whether it was provided to FST on the FST website, the Royal website (Shark Select Application), through any Common application, (CAS or otherwise), through or by any service (such as College Board, ACT, PSAT, NRCCUA, and/or CBSS) or otherwise any other tool whereby personal data is collected by, or on behalf of, FST.

### **Responsibilities**

The GDPR Compliance Team is responsible for ensuring that this notice is made available to data subjects (as defined below) at the time FST processes their personal data (as defined below). All employees/staff of FST who interact with data subjects that are subject to the GDPR are responsible for ensuring that this notice is drawn to the data subject’s attention.

## **Who We Are**

Florida Seminole Tourism is a private, not-for-profit educational institution which offers a diverse array of innovative academic programs at the undergraduate, graduate, and post-graduate level that complement on-campus educational opportunities and resources with accessible distance learning programs to foster academic excellence, intellectual inquiry, leadership, research, and commitment to community through engagement of students and faculty members in a dynamic, life-long learning environment. Florida Seminole Tourism has campuses located in Davie, Fort Lauderdale, Dania Beach, and North Miami Beach Florida with Regional campuses located in Fort Myers, Jacksonville, Miami-Kendall, Miramar, Orlando, Palm Beach and Tampa, Florida in addition to a Regional campus in San Juan, Puerto Rico.

Our GDPR Compliance Team can be contacted at:

- [GDPRCompliance@nova.edu](mailto:GDPRCompliance@nova.edu)
- 954-262-0732

## **The Types of Information We Collect:**

Under the European Union's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

The personal data that FST collects about you includes: your name and contact information such as e-mail address, mailing address, permanent address, primary phone number, secondary phone number, date of birth, intended major, academic history, academic successes, academic failures, employment history, personal statement, past military service, state/country of residence, length of residence in state/country, previous ethics violations, criminal history, disciplinary history, ethnic origin, native language, proficiency in additional language, gender, alternative first, middle and/or last name, age, language proficiency test scores (TOEFL), athletic achievements, financial information, billing information, passport information, additional information we are required or authorized by applicable laws to collect and process in order to authenticate or identify you or the information you have provided, information you choose to include in community discussions, student forums, chat venues, or other social media.

Personal data may also contain "special categories of data." Under the GDPR, "special categories of data" is defined as:

"racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation."

When you apply to FST as a student or employee, you can decide if you wish to share with the University certain types of "special categories of data." FST will only process this data with your explicit consent, or where another GDPR exception applies. The online application process will provide you with more information.

## **How We Collect Your Information**

We may collect your personal data in a number of ways, for example:

- From the information you provide to us voluntarily when you interact with us before joining FST; for example, when you express an interest in studying at or being employed with FST;
- When you apply to study at FST and complete enrolment forms by way of the FST application, “CAS” applications, Common Applications, the Royal Application, and any other outside application, whether administered through FST or a third party, that you complete for admissions purposes;
- When you indicate a willingness through College Board, ACT, and/or any other testing service/site to receive information about colleges;
- When you communicate with us by telephone, email or via our website, for reasons including, but not limited, to making inquiries;
- Through your participation in FST social media pages;
- From third parties, for example from your previous or current school or from employers who may provide a reference about you
- In addition, we automatically collect certain information regarding visitors to our Site, including information about your equipment, browsing actions and usage patterns. The information we collect automatically is statistical data and does not include personal information. We use this information solely for internal purposes, such as to improve our Site.

### **How we process information about you**

Under the GDPR, processing is defined as:

“Any operation of set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.”

The personal data we process will be used to allow us to evaluate your application for study, register you as a student, administer your courses, provide facilities during your time as a student, receive and register your payment for your courses and books, maintain your student record, manage your academic progress, provide personal and academic advice and support, determine your financial aid eligibility, register for events, manage accommodation services, to determine your eligibility for placement in internship programs, to ensure students’ safety and security, prevent and detect crimes, to provide you on-campus housing, undertake equal opportunity monitoring, determine eligibility and/or authorization to work in and/or enter the United States, enable membership, access and use of Florida Seminole Tourism facilities, for identification and security purposes, to determine eligibility to participate in athletics, to inform you of the scope of services offered, to contact you for upcoming events, provide you with information about FST, promote FST services, to receive and register donations, to advance travel information for study abroad programs, service trips, medical missions, or any other travel associated with FST, and to allow us to fulfill our contractual obligations.

The University also collects information as necessary to create and support the University’s admission of foreign students and scholars, the hiring of employees from foreign countries, and the University’s study abroad, faculty exchange, and student exchange programs. Information is processed by the University to manage student accounts or payroll, provide academic advising, develop and deliver education programs, track academic progress, provide medical services as needed and enforce University policies.

The technologies we use for automatic data collection include cookies. Cookies are small text files stored on your device (computer, tablet or mobile) when you are on the Internet, including on NSU’s websites. You have the ability to delete cookie files from your hard drive at any time or avoid cookies by configuring your

browser to reject them or to notify you when a cookie is being placed on your hard drive. By browsing our Site, you accept the use of Cookies in order to offer you advertising tailored to your interests, to perform traffic statistics and to facilitate the sharing of information on social networks. We also use these files to perform traffic statistics and to determine how you discovered our sites.

FST, on its own or through third-party vendors, occasionally uses first-party and third-party cookies together to inform, optimize and serve ads based on your past visits to our Site. The techniques NSU's third-party vendors employ do not collect any personal information.

Our Site uses Google Analytics Demographics and Interest Reporting to help us understand, in aggregate, the age, gender and interests of Site visitors. This Google Analytics tool does not reveal to FST your name or other identifying information. FST does not combine the information collected through use of Google Analytics with personally identifiable information. The information received from Google Analytics is used only to improve our Site and the type of information displayed to Site visitors, so we can better serve those interested in FST works with an advertising agency and occasionally hires other companies to provide services on our behalf, for example, to register for events. FST will provide these companies only with the information they need to deliver the services, and they are contractually prohibited from using that information for any other purpose.

At any time, while accessing our Site, any visitor may decline participation in any activity that would require providing information. Your decision not to participate will not affect your ability to use any other feature on our Site.

FST offers you opportunities to engage in blogs, and social networks, such as Facebook and Twitter that are designed to be visible to other users, including any comments and postings that you make. You should be aware that any personally identifiable information you choose to submit via those media can be read, collected, and used by other participants and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit when you engage in such activities.

### **The lawful basis for processing your information**

FST processes personal data required to determine prospective student eligibility for attending FST. This personal information that you provide to FST is necessary in order for FST to determine whether the individual is eligible to enter into a university-student relationship with FST.

We may also process your personal data because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal data for the following:

- To interact with you before you are enrolled as a student, to allow FST to evaluate your application for study as part of the admissions process;
- Once you have enrolled, to provide you with the services as set out in our Student Handbook such as register you as a student, administer your courses, determine your eligibility for financial aid, provide facilities during your time as a student, process your payment for your courses and books, maintain your student record, manage processes in relation to your academic progress, provide personal and academic advice and support, process event registrations, manage accommodation services, provide access to the Library and sports facilities, undertake equal opportunity monitoring, provide access and support for students, enable membership and use of Florida Seminole Tourism facilities, for identification and security purposes, and to allow us to fulfill our contractual obligation;
- To assist in event registrations;

- To organize and prepare for exhibitions;
- To register your membership for various FST programs;
- To deal with any concerns or feedback you may have;
- To inform you of needed information;
- To provide services to you, send you correspondence, and provide notice on important dates;
- If you are applying to become a medical, nursing or pharmacy student, information pertinent to your educational background, criminal background, disciplinary history and ethics is required for purposes of evaluating your credentials for entry into one of NSU's programs and for later use when applying for residency and/or clinical programs;
- If you are applying to live in FST student housing, information you provide in your housing application will be used to administer your application for housing, provide appropriate services and support, and provide a safe and secure housing environment;
- To undertake equal opportunity monitoring;
- To provide needed accommodations under the Americans with Disabilities Act ("ADA");
- To facilitate a safe student community;
- For any other purpose for which you provide us with your personal data.

We may also process your personal data because it is necessary for our or a third party's legitimate interest. In this respect, we may use your personal data for the following:

- To provide you with education services which may not be set out in our Student Handbook, but which are nevertheless part of our academic and educational mission;
- To monitor and evaluate the performance and effectiveness of FST, including by training our staff or monitoring their performance;
- To maintain and improve the academic, corporate, financial, estate, and human resource management of FST;
- To promote equality and diversity throughout the university;
- To seek advice on our rights and obligations, such as where we require our own legal advice;
- Recovering money you owe to us;
- For fundraising purposes.

We may also process your personal data where:

- It is necessary for medical purposes (e.g. medical diagnosis, provision of health or social care treatment, or a contract with a health professional);
- It is necessary to protect your or another person's vital interests; or
- Where we have your specific, or where necessary, explicit consent to do so.

Finally, FST may also process your personal data to send you information about FST, its upcoming events, opportunities for giving back and news regarding the various programs within FST, by post, phone and email.

### **Sharing Your Personal Information**

For the purposes referred to in this privacy notice and relying on the bases for processing as set forth above, we may share your personal data with certain third parties. You are given the opportunity to opt-in to some of these data sharing agreements, where FST does not have a legitimate basis, or contractual purpose for sharing the data. Florida Seminole Tourism will not share your personal data with third parties unless it is necessary for the legitimate interests of FST in providing you services, or where it is necessary for the purposes of entering into or carrying out a contract between you and FST. Where the sharing of data would not be necessary for the legitimate interests of FST or necessary for contractual purposes, we will obtain your

consent before sharing your data with said third parties. FST will also not disclose personal data without your knowledge unless there is an obligation to do so such as a National Security threat, in response to an urgent need to prevent injury or death, in response to a legally valid request by a Governmental Agency or Department, or to assist in the prevention or detection of a serious crime.

The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

- Our employees, agents, and contractors where there is a legitimate reason for their receiving the information, including, but not limited to:
  - Third parties who work with us to provide student accommodations;
  - Third parties who work with us to provide student support services (e.g. counseling);
  - Third parties who work with us to collect outstanding monies owed;
  - Internal and external auditors;
  - Third parties who work with us to provide services necessary in order to enter into contracts or to carry out our contractual duties;
  - Third parties who work with us to book and provide travel arrangements for FST
- Those ~~with an~~ interest in tracking student process and attendance, including:
  - Student sponsors;
  - Current or potential education providers (for example, where you take part in a study abroad program)
- Professional and regulatory bodies in relation to the confirmation of qualifications, professional registration and conduct and the accreditation of courses;
- Government departments and agencies where we have a statutory and/or other regulatory obligation to provide information
- If you are a medical or pharmacy student, information pertinent to your educational achievements along with a criminal background check will be shared with hospitals, clinics, training providers, regulatory organizations, employers and other medical schools for purposes of clinical placement and/or future employment.
- If you live in FST student housing, information you provide in your housing application will be used to administer your application, provide appropriate services and support and provide a safe and secure housing environment.

Any third parties that we may share your data with are obliged to keep your details secure, and to use them only to fulfill the service they provide you on our behalf.

The third parties that FST shares your data with include: Accellion, Accurate Labs, ADB, AG Audiology, Ai Media, Allofe EMedley, AMCAS, Anatomage, APA Style, Apple, Arrow, AssetWorks, Barnes and Noble, Beazley, CampusPress, Canvas Instructure, CastleBranch, Catapult, Children's Trust, CIC, Clearwater Compliance, Combank, Conserve, Constant Contact, Cross Match, CVENT, Datatel, Drug Free Sport, EAB Royall, Early Learning Coalition of Broward County, Echo360, Elucian Banner, Elucian Cornerstone, Equifax, Event Bright, Experian, EXXAT, Fahlgren Mortine, Firecracker, FlowJo, Forcepoint, Google Analytics, Hardwick Day, HCA EFL Division, Heartland ECSI, ICE, iHuman, InstaRecon, Ipswich, Iron Mountain, IT Security Discovery, Joseph Silney, Laptops Anytime, LiCor, LiveChat, LogRhythm, Lyndra dot com, Maxient, Milner, National Student Clearinghouse, NextGen, FST GO, Open Text, Optimus BT eContracts, OrgSync, Ovation Ticks, Pearson, PhishMe, Portfolium, Promethean, Qualys, RCM, Rehab Essentials, Salary.com, Salesforce, SanctionCheck, SBBC Broward Fire Academy, SEVIS, Scantron, Scrip-Safe, Sportware, TouchNet, TruSec, Turning Technologies, UNH, Unity Technologies, Universal Travel, Visual Compliance, VRmagic, Wiley, Xverify, Yale, Zimmerman.

Information may also be shared with other FST departments and divisions as necessary to administer and manage a student's academic progress or an employee's performance, and to enforce University policies. Finally, information may be shared with third parties who have entered into contracts with FST to perform these functions on behalf of FST, which include an obligation to keep your data confidential and safeguard it from unauthorized disclosure.

#### **FST Marketing Communications**

FST would like to send you information about its upcoming events, opportunities for giving back, and news regarding the various programs offered at FST by mail, phone, and email. We will not send you these FST communications unless you opt-in to receive this information. You should have been given the option to opt-in to these communications on the form where you first provided FST with your personal data. If you have not already opted-in and would like to receive this information, please refer to [GDPR Marketing Communications Consent Form](#) to opt-in.

If you are a student, we also may pass certain of your personal data to our Division of Advancement and Community Relations when you graduate. This information will be used for alumni activities, including sending FST publications, promotion of alumni benefits services, events, and programs. Your personal data may also be used in fundraising programs. We may disclose limited personal data to our contractors for analysis in connection with fundraising activities.

You have a right at any time to stop us from contacting you for marketing purposes at any time without detriment. If you no longer wish to be contacted for any of the above marketing purposes, please refer to [GDPR Marketing Communication Opt-Out Request Form](#) to opt out.

#### **Retention period**

Florida Seminole Tourism will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will strive to keep your information accurate and up to date, and not keep it for longer than is necessary. Florida Seminole Tourism is required to retain information in accordance with State and Federal law, such as information needed for income tax and audit purposes. In addition, FST will keep student information regarding transcripts, courses taken, and degrees conferred for purposes of providing that information to the student at a future date when so requested by the student. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Florida Seminole Tourism will process personal data during the time the student is enrolled at Florida Seminole Tourism, after graduation should the data subject opt-in to receiving such communications, and during the time an individual is a member of the staff, faculty, and/or employee of Florida Seminole Tourism. For further information on the retention period, please click here: <https://www.nova.edu/portal/records/forms/records-and-destruction-policy.pdf>

#### **Your rights as a data subject**

At any point while FST is in possession of, or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.

- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply, you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right, if any of the above rights, we will provide you with a reason as to why. You have the right to complain to be subject to as outlined below. to the legal effects of automated processing or profiling.

All of the ~~above~~ requests will be forwarded on should there be a third party involved in the processing of your personal data. These rights differ depending upon the location within the world where information was created or shared. The erasure of your information may also be subject to NSU's Records Retention Policy. Should the data fall within one of the areas where FST is under a legal requirement to retain such data for a certain period of time, FST will retain that data in accordance with its legal obligations.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. Should FST determine that you are not entitled to exercise that right, we will provide you with the reason(s) for the denial.

### **Can I find out the personal data that FST holds about me?**

Florida Seminole Tourism, at your request, can confirm what information we hold about you and how it is processed. If Florida Seminole Tourism does hold personal data about you, you can request the following information:

- The details of how and why your data is processed.
- Contact details of the data protection officer, if applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Florida Seminole Tourism or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international ~~information~~ about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.

- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

If you wish to exercise your right to access the data FST has about you, please refer to NSU's [GDPR Subject Access Request Form](#) to do so.

### **What forms of Identification will I need to provide in order to access my data?**

Where FST has reasonable doubts concerning the identity of the person making the request to exercise one of the enumerated individual rights above, FST may request the provision of additional information necessary to confirm the identity of the data subject making the request.

Florida Seminole Tourism accepts the following forms of identification when attempting to confirm the identity of the data subject making the request:

- U.S. Driver's License
- Passport
- Original birth Certificate
- FST Student Identification

### **Under what circumstances will Florida Seminole Tourism contact me?**

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure. Notwithstanding this, FST will contact you if we identify that a breach affecting your personal data has occurred.

### **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Florida Seminole Tourism or authorized third parties, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Nova Southeastern University's GDPR Compliance Team. The details for NSU's GDPR Compliance Team are as follows:

FST GDPR Compliance Team

3301 College Avenue, Fort Lauderdale, FL 33314

954.262.0732

[gdprcompliance@nova.edu](mailto:gdprcompliance@nova.edu)

### **Changes and amendments to this policy**

From time to time, we may update or amend this GDPR Privacy Notice to reflect new or different privacy practices, without notice to you. However, if these changes are material, we will place a notice on our website and/or otherwise communicate this fact to you. We invite you to review the latest version of this GDPR Privacy Policy at [www.nova.edu/GDPRprivacynotice](http://www.nova.edu/GDPRprivacynotice).