

Office of Health Initiatives VOICE Program

EU General Data Protection Regulation Privacy Notice

This is the Georgia Institute of Technology's (Georgia Tech) Office of Health Initiatives VOICE Program 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 Georgia Tech's [EU General Data Protection Regulation Compliance Policy](#).

Lawful Basis for Collecting and Processing of Personal Data

Georgia Tech is an institute of higher education involved in education, research, and community development. In order for Georgia Tech to provide VOICE victim-survivor support and advocacy services and to coordinate additional services on behalf of survivors with campus or community partners as needed, it must collect, use and process this personal data.

The lawful basis for the collection and processing of personal data by Georgia Tech's Office of Health Initiatives falls under the following categories:

- Processing is necessary for the purposes of the legitimate interests pursued by Georgia Tech or third parties in providing educational, supportive, or advocacy services.
- The individual data subject (hereinafter referred to as the "Individual") has given consent to the processing of their special categories of sensitive personal data for one or more specific purposes.

Types of Personal Data collected and why

In order for Georgia Tech to provide VOICE victim-survivor support and advocacy services and to coordinate additional services on behalf of survivors with campus or community partners as needed, 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
- Unique personal identifiers and biographical information (e.g. date of birth)
- Special categories of sensitive personal data voluntarily provided by the Individual in conjunction with a signed consent form provided by The Office of International Education in conjunction with your study abroad program, which may include health data, race or ethnic origin, gender identity, and sexual orientation, in order to coordinate requested services
- Details of your education and/or employment qualifications

The personal data collected by Georgia Tech's Health Initiatives VOICE Program is not shared with other Georgia Tech Units or external third parties except as consented to by the Individual for coordination of services or when necessary to protect the Individual's interests when the Individual is physically or legally incapable of providing consent. Individuals can consent to their personal data being shared with some, all, or none of the Georgia Tech Units or external third parties listed below.

The personal data collected by Georgia Tech's Office of Health Initiatives will be shared as follows:

Georgia Tech Unit	Purpose
Law Enforcement	For coordinating meetings or security measures should the Individual choose to file a report with Georgia Tech Police Department.
Office of Human Resources	For coordinating meetings or safety should the Individual choose to file a report with Georgia Tech Office of Human Resources.
Division of Student Life/Deans	For requesting the Division of Student Life provide documentation to faculty due to class absences, missed assignments or exams, or anticipated academic or employment setbacks in the aftermath of a victimization or to assist an Individual with withdrawing from courses.
Title IX Coordinator	For coordinating meetings or safety should the Individual choose to file a report with the Title IX Coordinator or choose to meet with the Title IX Coordinator to further discuss options.
Office of Student Integrity	For coordinating meetings or safety should the Individual choose to request a Georgia Tech No Contact Directive or to provide emotional support prior to, during, or following a disciplinary hearing.
Georgia Tech Counseling Center	For arranging services when the Individual is in immediate crisis or for coordinating with service providers to ensure continuity of care.
Center for Assessment, Referral, and Education (CARE)	For arranging services when the Individual is in immediate crisis or for coordinating with service providers to ensure continuity of care.
Stamps Health Services	For coordinating with service providers to ensure continuity of care.
Department of Housing	For exploring and arranging emergency and longer term housing options.
Institute Professor(s)	For providing documentation to faculty due to class absences, missed assignments or exams, or anticipated setbacks in the aftermath of a victimization or to assist an Individual with withdrawing from courses or seeking other academic accommodations.
Academic Departments	For providing documentation to faculty due to class absences, missed assignments or exams, or anticipated setbacks in the aftermath of a victimization or to assist an Individual with withdrawing from courses or seeking other academic accommodations.
Registrar's Office	For exploring or assisting an Individual with course withdrawals or with other issues or changes to their course registration.
Bursar's Office	For exploring or arranging emergency financial assistance.
Office of Scholarships and Financial Aid	For exploring or arranging emergency financial assistance or emergency and longer term housing options or for exploring the financial impact of GPA, course completion, course withdrawals, or of withdrawal from the Institute.
Office of International Education	For arranging medical, legal, or support services for an Individual or to request changes in housing, academic, or Study Abroad arrangements.

Third-Party Name	Purpose
Law Enforcement/Prosecutor/Attorney	For coordinating meetings or security measures should the Individual choose to participate in a criminal investigation or prosecution process.
Parent/family member/friend	For coordinating care and providing emotional support to secondary survivors when the Individual requests such coordination.
Medical or Mental Health Service Providers	For arranging services when the Individual is in immediate crisis or for coordinating with service providers to ensure continuity of care.

Georgia Tech is a unit of the Board of Regents of the University System of Georgia (the “BOR”), and data is shared with the BOR and its employees. Data related to experiences of sexual violence reported to VOICE Advocates are not shared with the BOR.

If you have specific questions regarding the collection and use of your personal data, please contact the Office of Enterprise Data Management at eugdpr@edm.gatech.edu

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

Where Georgia Tech gets Personal Data and Special Categories of Sensitive Personal Data

Georgia Tech receives personal data and special categories of sensitive personal data from multiple sources. Most often, Georgia Tech 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 Georgia Tech through use of the Common App).

Individual Rights of the Data Subject under the EU GDPR

Individual data subjects covered by Georgia Tech’s [EU General Data Protection Regulation Compliance Policy](#) will be afforded the following rights:

- a) information about the controller collecting the data
- b) the data protection officer contact information
- c) the purposes and legal basis/legitimate interests of the data collection/processing
- d) recipients of the personal data
- e) if Georgia Tech intends to transfer personal data to another country or international organization
- f) the period the personal data will be stored
- g) 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
- h) the existence of the right to withdraw consent at any time
- i) the right to lodge a complaint with a supervisory authority (established in the EU)

- j) why the personal data are required, and possible consequences of the failure to provide the data
- k) the existence of automated decision-making, including profiling
- l) 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 the Office of Enterprise Data Management at eugdpr@edm.gatech.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 Georgia Tech under the scope of the Georgia Tech [EU General Data Protection Regulation Compliance Policy](#) must comply with the security controls and systems and process requirements and standards of NIST Special Publication 800-171 as set forth in the [Georgia Tech Controlled Unclassified Information Policy](#).

Georgia Open Records Act

As a state university, Georgia Tech is subject to the provisions of the [Georgia Open Records Act](#) (ORA). Except for those records that are exempt from disclosure under the ORA, the ORA provides that all citizens are entitled to view the records of state agencies on request and to make copies for a fee. The ORA requires that Georgia Tech produce public documents within three business days. For more information on Georgia Tech's ORA compliance, please visit the [Open Records Act page on the Legal Affairs website](#).

Data Retention

Georgia Tech keeps the data it collects for the time periods specified in the University System of Georgia Records Retention Schedules: https://www.usg.edu/records_management/schedules/

Record Type	Retention Schedule Link
Medical, Counseling, Psychological, and Psychiatric Case Records	https://www.usg.edu/records_management/schedules/2521