



1. Purpose

Under provisions outlined in the European Union's General Data Protection Regulation (GDPR), Article 13, this privacy notice provides data subjects details relating to the collection of personal data.

2. Scope

All data subjects whose personal data is collected, in line with the requirements of the General Data Protection Regulation (GDPR).

3. Responsibilities

3.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to the University of Mary collecting/processing their personal data.

3.2 All employees/staff of the University of Mary who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

4. Privacy Notice

4.1 What is the University of Mary?

The University of Mary is a private, Christian, Catholic, Benedictine university that welcomes students of all faiths and backgrounds. Infusing Benedictine values throughout the educational experience, Mary offers distinguished, professionally-focused academic programs enlivened by the liberal arts, global and civic service, robust internships, and mentoring by respected faculty.

Data Protection Officers and data protection representative can be contacted directly:

Carlo A. Dacumos, Data Protection Officer
7500 University Drive
Bismarck, North Dakota 58504
USA
Phone: 1.701.355.8172
cdacumos@umary.edu



University of Mary
Data Protection Privacy Notice

October 17, 2018

Karrie Huber, Data Protection Officer
 7500 University Drive
 Bismarck, North Dakota 58504
 USA
 Phone: 1.701.355.8226
kkhuber@umary.edu

Dr. Michael F. Lombardo, Data Protection Representative
 University of Mary Rome Campus
 Via del Casaletto, 538
 00151 Rome, Italy
 Phone: 39.06.65.79.3087
mflombardo@umary.edu

The personal data the University of Mary would like to collect from and process on you is:

Personal data type:	Source (where University of Mary obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Name	Data Subject
Date of Birth	Data Subject
Home Address	Data Subject
Telephone Number	Data Subject
Social Security Number	Data Subject
Email Address	Data Subject
Any information reported on the Free Application for Federal Student Aid (FAFSA)	US Department of Education
Government ID	Data Subject
Verification Worksheet and Supporting Documentation	Data Subject
Alternative Education Loan Application	Vendor
External Agency Funding Application	Data Subject
Application Data	Data Subject



University of Mary Data Protection Privacy Notice

October 17, 2018

Passport	Data Subject
Visa	Data Subject
Health Insurance	Data Subject
Health History	Data Subject
Consulate Letter	Data Subject
Emergency Contact Name & Relationship	Data Subject
Emergency Contact Address	Data Subject
Emergency Contact Phone	Data Subject
Travel Information (Hotel & Flight)	Data Subject
Payment Information	Data Subject
Employment Contract	Data Subject
Salary	Data Subject
Personal Bank Account	Data Subject
Credit Card Information	Data Subject
US Military Service	Data Subject
Standardized Test Scores	Data Subject/Vendor
Academic Transcripts	Data Subject/Vendor
History of Schools Attended	Data Subject
Recruitment Event Attendance	Data Subject
Campus Visit Attendance	Data Subject
Parent(s) Name	Data Subject
Parent(s) Address	Data Subject
Parent(s) Phone Number	Data Subject
Parent(s) Email	Data Subject
Academic Interests	Data Subject
Extra-curricular Interests	Data Subject
Communication Logs	Data Subject
Resume Information	Data Subject
Personal References	Data Subject
Residency Documentation	Data Subject
Immunization History	Data Subject
Licensures	Data Subject
Criminal Offenses	Data Subject/Vendor

The personal data the University of Mary collects will be used for the following purposes:

- Registration
- Financial Aid
- Housing
- Meal Plans
- Financial Transactions



University of Mary Data Protection Privacy Notice

October 17, 2018

- Studying Abroad
- Pilgrimages/Field Trips
- Athletics Recruitment
- Admissions Processing
- Marketing Academic Programs
- Enrollment Data Analysis
- Employment
- Benefits Administration
- Electronic Access
- Maintenance Requests
- Compulsory Governmental Reporting

Our legal basis for processing for the personal data:

- Processing of Title IV Federal Financial Aid
- Processing of Alternative Education Loan(s)
- Processing of external agency funding, i.e. scholarship
- U.S. Department of Education National Center for Education Statistics (NCES)
 - Integrated Postsecondary Education Data System (IPEDS)

Any legitimate interests pursued by the University of Mary or third parties on behalf of the University of Mary, are as follows:

- Campus Management
- Ancelle della Carità
- Fontechiari Tour
- National Collegiate Athletic Association (NCAA)
- Northern Sun Intercollegiate Conference (NSIC)
- Front Rush
- Technolutions
- Collegis
- National Research Center for College and University Admissions (NRCUA)
- Cappex
- The Cardinal Newman Society
- ACT
- College Board
- Parchment
- National Student Clearinghouse
- Mongoose
- Wufoo by Survey Monkey
- Ruffalo Noel Levitz



- North Dakota eTranscripts
- Image Printing

The special categories of personal data concerned are:

- Health Data
- Genetic Data
- Religious Beliefs
- Philosophical Beliefs
- Ethnicity
- Race

4.2 **Consent**

By consenting to this privacy notice you are giving the University of Mary permission to process your personal data specifically for the purposes identified.

Consent is required for University of Mary to process both personal data and special categories of personal data, but it must be explicitly given. Where the University of Mary is asking you for sensitive personal data, it will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting a Data Protection Officer or Representative (contact information provided above), who will provide you a Data Subject Consent Withdrawal Form. Complete and return the form to a Data Protection Officer or Representative.

4.3 **Disclosure**

University of Mary will not pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:



Third country (non-EU)/international organization	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place here:
University of Mary 7500 University Drive Bismarck North Dakota 58504 USA Purpose(s): Necessary processing of personal data for matriculation.	Physical & digital access, storage, and processing safeguards	Email: helpdesk@umary.edu Request list of safeguards.
U.S. Department of Education National Center for Education Statistics (NCES)	Physical & digital access, storage, and processing safeguards	Email: helpdesk@umary.edu Request list of safeguards.

4.4 Retention period

University of Mary will process personal data for the duration of your association with the University and will store the personal data for the period(s) required by law for governmental compliance reporting and accreditation.

4.5 Your rights as a data subject

At any point while the University of Mary 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 the University of Mary holds about you.
- Right of rectification – you have a right to correct data that the University of Mary holds about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances, you can ask for the data that the University of Mary holds about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply, to have a right to restrict the processing.
- Right of portability – you have the right to have the data about you held by the University of Mary transferred to another organization.
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- 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 to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: If the University of Mary refuses your request under rights of access, the University of Mary will provide you with a reason as for the denial. You have the right to complain as outlined in clause 4.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 4.3 above) in the processing of your personal data.

4.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by University of Mary (or third parties as described in 3.3 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and University of Mary’s Data Protection Officers and/or Data Protection Representatives.

The details for each of these contacts are:

	Supervisory Authority contact details:	Data Protection Officer (DPO) contact details:
Contact Name:	Italian Supervisory Authority	Carlo A. Dacumos
Address line 1:		7500 University Drive
Address line 2:		Bismarck, North Dakota 58504
Address line 3:		USA
Address line 4:		
Address line 5:		
Email:		cdacumos@umary.edu
Telephone:		1.701.355.8172



	Data Protection Officer (DPO) contact details:	Data Protection Representative contact details:
Contact Name:	Karrie Huber	Dr. Michael F. Lombardo
Address line 1:	7500 University Drive	University of Mary Rome Campus
Address line 2:	Bismarck, North Dakota 58504	Via del Casaletto, 538
Address line 3:	USA	00151 Rome, Italy
Address line 4:		
Address line 5:		
Email:	khuber@umary.edu	mflombardo@umary.edu
Telephone:	1.701.355.8226	39.06.65.79.3087

4.7 Privacy statement

Read more about how and why the University of Mary uses your data here:
https://my.umary.edu/ICS/Technology_Resources/

Online Privacy Statement (see paragraph 4.7
https://my.umary.edu/ICS/Technology_Resources/)

Personal Data

Under the European Union’s General Data Protection Regulation (GDPR), Article 4, (1), 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.”

How does the University of Mary use your information?

This privacy notice tells you how the University of Mary will collect and use your personal data for matriculation at the University.

Why does the University of Mary need to collect and store personal data?



In order for the University of Mary to provide educational services, it needs to collect personal data for governmental and accreditation compliance or reporting, enrollment, housing, dining services, etc. In any event, the University of Mary is committed to ensuring that the information collected and used is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes, the University of Mary would contact you for additional consent.

Will the University of Mary share my personal data with anyone else?

The University of Mary may pass your personal data on to third-party service providers contracted to the University of Mary in the course of dealing with you. Any third parties that with which the University of Mary may share your data are obliged to keep your details secure, and to use them only to fulfill the service they provide you on our behalf. When they no longer need your data to fulfill this service, they will dispose of the data in line with the University of Mary's procedures. If the University of Mary wishes to pass your personal data onto a third party, it will only do so with your prior consent, unless legally required to do otherwise.

How will the University of Mary use the personal data it collects about me?

The University of Mary will process (collect, store, and use) the information you provide in a manner compatible with the European Union's General Data Protection Regulation (GDPR). The University of Mary will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. The University of Mary is required to retain certain information in accordance with applicable governmental laws, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific accreditation and business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will the University of Mary contact me?

The University of Mary's aim is not to be intrusive, and the University endeavors 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.

Can I find out the personal data that the organization holds about me?

The University of Mary at your request can confirm what information it holds about you and how it is processed. If the University of Mary does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organization that has determined how and why to process your data. In some cases, this will be a representative in the European Union.



- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of the University of Mary 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 the University of Mary intends to transfer the personal data to a third country or international organization, information about how the University assures information security {=>shall be provided on request<=?}. The European Union has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, the University of Mary shall 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.

What forms of ID will I need to provide in order to access this?

The University of Mary accepts the following forms of identification when information on your personal data is requested:

- Passport, birth certificate, or state- or federal-government-issued identification, i.e., driver's license, identity card