

# Stamps Health Services

## EU General Data Protection Regulation Privacy Notice

This is the Georgia Institute of Technology's (Georgia Tech) Stamps Health Services 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 process immunization documents and other medical information to satisfy the University System of Georgia immunization requirements, and other medical information as may be needed to provide continuity of patient care, it must collect, use and process this personal data.

The lawful basis for the collection and processing of personal data by Georgia Tech's Stamps Health Services 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 services.
- The data subject has given consent to the processing of his or her special categories of sensitive personal data for one or more specific purposes, including without limitation the processing of immunization documents to satisfy the University System of Georgia immunization requirements and other medical information as may be needed to provide continuity of patient care, and is necessary for that purpose.

### Types of Personal Data collected and why

In order for Georgia Tech to collect required immunization and medical data, 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)
- Medical information including, without limitation, immunization records

The personal data collected by Georgia Tech's Stamps Health Services is not shared with other Georgia Tech Units or external third parties.

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](mailto: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 and Sensitive Personal Data**

Georgia Tech receives personal and 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](mailto: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 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/](https://www.usg.edu/records_management/schedules/)

[https://www.usg.edu/records\\_management/schedules/2521](https://www.usg.edu/records_management/schedules/2521)

(Medical Services Records)