

COLUMBIA GLOBAL CENTERS

PRIVACY NOTICE

This Privacy Notice describes how Columbia Global Centers (“**Columbia**,” “**we**,” or “**us**”) collects, uses, stores, transfers, and otherwise processes personal information about you in connection with Columbia Global Centers sites (“**Global Centers**”), which are designed to provide opportunities to students, alumni, and other Columbia affiliates to socialize, study, and network. This Privacy Notice also sets out your rights in relation to this personal information.

For purposes of the EU General Data Protection Regulation (“GDPR”) and other data protection laws in the jurisdiction in which you are located, the data controller is Columbia University (i.e., Columbia, Columbia Global Centers or Centers for International Programs, LLC), located at 91 Claremont Ave, New York, NY 10027, USA.

This Privacy Notice applies to all personal information we collect or process about you in the context of Columbia and the Global Centers, including your use of the sites, health- and safety-related information collected when you use the facilities where permitted by local law, and your remote participation in Columbia University’s academic programs (“**remote access**”).

Please note that certain sites associated with Columbia and the Global Centers are facilities operated by a third-party, WeWork. Columbia is not otherwise affiliated with WeWork and is not responsible for WeWork’s processing of your data, and to the extent you use WeWork’s online services and applications, we recommend reviewing their [privacy policy](#) carefully.

1. PERSONAL INFORMATION WE COLLECT AND USE

In connection with your use of the Global Centers including the sites operated by WeWork, Columbia collects and uses certain personal information about you. Personal information is information about you through which you can be identified (including where you can be identified by combining the information with other information). The use of your personal information includes sharing with International SOS, Columbia’s third-party international emergency assistance provider.

Note that we may be required by law to collect certain personal information about you, or as a consequence of our contractual relationship with you. Failure to provide this personal information may prevent or delay the fulfilment of these obligations. We will inform you at the time your personal information is collected whether certain data is compulsory and the consequences of the failure to provide such personal information.

1.1 Personal information we collect directly from you

We collect some personal information directly from you. Personal information that is collected directly from you may include the following:

- a) Personal details (e.g., first and last name)
- b) Contact details (e.g., phone number, email address, city & country of residence, mailing address)
- c) Identification numbers (e.g., Social Security number or other government-issued identification number when permitted by local law, UNI)
- d) Photographs for use in identification
- e) Your emergency contact details (e.g., names of your emergency contacts and their contact information)
- f) Health- and safety-related information we collect when you use the facilities (e.g., confirmation that you meet health and safety guidelines to use the facilities, which you certify via mobile application, when permitted by local law; your UNI; date and time you use the facilities)
- g) Account details (e.g., user names, passwords, security questions and answers)

- h) Communications (e.g., when you contact us with questions, comments, or requests; when you participate in class or communicate with faculty; participate in polls or surveys)
- i) Information about your participation in remote learning programs (e.g., participation dates; student-generated content such as assignments and related academic materials submitted to instructors; course or faculty feedback you provide; responses to quizzes, exams, and surveys; grades, examination records, participation / attendance records; supervision, teaching, or tutorial activities)

1.2 **Personal information we automatically collect about you**

In addition, the following categories of personal information may be automatically collected or generated about you, such as when you participate in remote access programs or use a health assessment app for the purpose of analyzing how the sites and apps are being used:

- a) Technical information collected from your computer or mobile device (e.g., your IP address, device identifiers, browser type, operating system)
- b) Information about your usage of remote access tools/sites or mobile apps (e.g., information collected through the use of cookies and similar tracking technologies; any search terms you enter; how often you visit or use the tools, sites, or apps; pages you access before and after; how you interact with tools, sites, or apps)
- c) Information we generate as a result of your use of such tools, sites, or apps (e.g., our understanding of your learning preferences)

1.3 **Personal information we obtain from other sources**

Columbia may also obtain personal information about you from third parties, such as WeWork (who provides the sites used for Columbia Global Centers). These types of personal information include:

- a) Personal details (e.g., first and last name)
- b) Dates and times you use or visit the Global Centers including the WeWork sites
- c) Any reports of incidents or issues occurring at the Global Centers including the WeWork sites

1.4 **Sensitive information we collect and use**

Some of the categories of personal information that we collect are considered special categories of personal data under other local law, and these types of information are considered particularly sensitive. Specifically, we may process the following sensitive information:

- a) Health- and safety-related information we collect when you use the facilities, as permitted by local law (e.g., confirmation that you meet health and safety guidelines to use the facilities, which you certify via mobile application, when permitted by local law; your UNI; date and time you use the facilities) identification numbers, where considered sensitive under local law.
- b) Personal data revealing political opinions or religious or philosophical beliefs in connection with programming, surveys, or polls.

2. **HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT**

2.1 **How we use personal information**

Columbia uses your personal information in connection with the Global Centers to:

- **Provide you a location to socialize, study, and network.**
- **Provide remote access to Columbia programming.**
- **Improve our programs, learning tools, and related content.**

- **Identify and authenticate users of our Global Centers, systems and tools.**
- **Program planning and development.**
- **Keep our records accurate and up-to-date.**
- **Communicate with you**, such as responding to your requests or providing you updates about the school and academic programs or the Global Centers and sites, or providing information about the networking, study, and social opportunities available at various sites and/or specific site opportunities that may interest you.
- **Comply with legal obligations and exercise or defend our rights or the rights of third parties.** For example, we may use personal information to comply with legal obligations to which we are subject, including to respond to subpoenas, court orders, or other legal process; to cooperate with regulators and law enforcement as required by law; and to defend our rights or the rights of any third party in legal proceedings.
- **Protect the security of our systems and property (and those of third parties).**

We may also anonymize your personal information in such a way that you may not reasonably be re-identified, and we may use this anonymized information for any other purpose.

2.2 How we use sensitive information

Columbia uses sensitive personal information in connection with the Global Centers to:

- **Manage health and safety considerations.** To the extent we use information about your health as permitted by local law, we do so to comply with our health and safety obligations to maintain a safe environment for our students, faculty, and staff; and to comply with our contractual obligations to third parties providing space for the Global Centers.
- **Identify and authenticate you.** To the extent identification numbers are considered sensitive, we use them to identify and authenticate users of our Global Centers.
- **Permit you to participate in programming.** To the extent programming, surveys, or polls reveal Personal data concerning political opinions or religious or philosophical beliefs in connection with such programming, surveys, or polls, as permitted by local law.

We rely on the following legal bases to process your personal information:

- To comply with our contractual obligations to you.
- To comply with legal obligations to which we are subject.
- Where the processing is necessary to serve our legitimate interests, including our interests in the following:
 - (i) Providing our students, alumni, and other Columbia affiliates a location to socialize, study, and network;
 - (ii) Providing remote learning / academic services;
 - (iii) Protecting the health and safety of our students, alumni, and Columbia affiliates and the health and safety of other third parties;

- (iv) Improving our programs, websites, tools, and related content;
 - (v) Communicating with you;
 - (vi) Program planning and development;
 - (vii) Keeping our records accurate and up-to-date; and
 - (viii) Customizing your learning experience.
- To the extent required by applicable local laws, with your consent.

3. WHO HAS ACCESS TO YOUR PERSONAL INFORMATION

We may share your personal information with the following parties:

- WeWork: We partner with WeWork to provide the physical workspaces for the Global Centers. In order to facilitate your access to the sites, we share information about you including your name, date of birth, email, phone number, and your photograph for purposes of creating a badge ID.
- Service providers. We may share your personal information with service providers who perform services or business operations for us for the purposes set out above. For example, we may engage service providers to provide learning management systems and video conferencing tools, optimize services, provide the health assessment app and related services, and support email and messaging services, among other purposes. **In addition, your personal information is automatically uploaded to Columbia's International SOS system called TravelTracker.**
- Where required by law. We may share your personal information with law enforcement agencies, courts, other government authorities or other third parties where we believe it is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party. For example, we may share information where required by law for contact tracing purposes.

Because we operate internationally, the recipients referred to above may be located outside the jurisdiction in which you are located. Please see the section on "International transfer of your data" below for more information.

4. HOW YOUR PERSONAL INFORMATION IS PROTECTED AND STORED

We implement physical, technical, and organizational security measures designed to safeguard the personal information we process in the context of the Global Centers. These measures are aimed at providing on-going integrity and confidentiality for your personal information.

We retain your personal information for as long as we have a relationship with you at which point we will delete your information from our systems. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations. We may also retain records to investigate or defend against potential legal claims.

5. INTERNATIONAL TRANSFER OF YOUR DATA

Your personal information may be transferred to, stored, and processed in a country (such as the United States) that is not regarded as ensuring an adequate level of protection for personal information under the laws of your home country.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your personal information is adequately protected. For more information on the appropriate safeguards in place, please contact us as described below.

6. **HOW TO EXERCISE YOUR RIGHTS**

Where applicable under local law, you may have the following rights with respect to your personal information:

- To access the information that we have about you
- To request that we rectify or erase your information
- To request that we restrict the way we use your information
- To object to the way we use your information, if we are processing your personal information on the basis of our legitimate interests
- To ask us to transfer your information to someone else
- To lodge a complaint with the appropriate data protection authority
- To withdraw consent at any time, if we are processing your personal information on the basis of consent
- In China, to request that we cancel or de-register your account registered for the purpose of remote access
- In France, to define guidelines regarding the fate of your Personal Data after your death

If you wish to exercise these rights, or to notify us of a change in your details, or if you have any questions on the content of this Privacy Notice, please contact as described below.

7. **HOW TO CONTACT US**

If you have questions or concerns regarding the way in which your personal information has been used, please contact Paul Hersh at phh2114@columbia.edu.

We are committed to working with you to obtain a fair resolution of any complaint or concern about your privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to make a complaint to the appropriate data protection authority.

8. **CHANGES TO THE PRIVACY NOTICE**

We may modify or update this privacy notice from time to time. If we make any revisions that materially change the ways in which we process your personal information, we will notify you of these changes before applying them to that personal information.

Effective: October 2, 2020