

Duke University is committed to fairly and appropriately managing and safeguarding the information collected, used and maintained in support of its academic, research and clinical missions. We prioritize transparency regarding our data management practices and respect the integrity of our stakeholders' personally identifiable information (PII). We take seriously our responsibility to protect individuals' privacy in balance with meeting our legal, policy and administrative obligations. We seek to minimize the information we collect, limit access to that information and apply appropriate security measures to protect against loss, improper modification or disclosure.

The Duke University Privacy Statement applies to activities conducted by Duke University and its direct affiliates and is intended to provide an overview of University privacy practices, including but not limited to categories of personal data processed, collection practices, and transfer of personal data. Some individual Duke websites may have their own privacy notices or additional privacy statements that supplement this Privacy Statement. Additionally, some Duke websites may contain links to external websites not owned or controlled by Duke. Duke is not responsible for the privacy practices or content of such websites.

By using this website or submitting information to Duke, you consent to our collection and use of information, in accordance with Duke policies, for Duke's legitimate business purposes, or as needed to provide services you request from Duke. For more information on cookies and website analytics use on Duke websites, please see the **Information We Collect Through Website Use** section of this Privacy Statement.

To Unsubscribe

Should you wish to unsubscribe from receiving emails from a particular Duke department or a Duke.edu domain, you may do so by unsubscribing through the unsubscribe feature included in specific emails, or by requesting this at privacy@duke.edu (link sends e-mail). Please note that Duke will not unsubscribe you from emails about your account or your transactions with us.

Contact Information

If you have questions about Duke's privacy practices, please contact privacy@duke.edu (link sends e-mail).

For information related to HIPAA (Health Insurance Portability and Accountability Act) or Protected Health Information (PHI) privacy matters, please contact the DUHS Compliance Office at 919-668-2573 or email compliance@dm.duke.edu (link sends e-mail).

PRIVACY STATEMENT - UPDATED May 16, 2025

+Introduction

This Privacy Statement describes how Duke University and its schools, centers, institutes, and other units and controlled affiliates (collectively, "we", "our" or "Duke") collect and process Personal Information that we gather in any hard copy or electronic manner that is owned and operated by, or in the possession or control of, Duke and that links to or references this Privacy Statement (collectively, the "Activities").

Some individual Duke websites may have their own privacy notices or additional privacy statements that may supersede or supplement this Privacy Statement when appropriate.

Please read this Privacy Statement carefully. By engaging with our Activities, you consent to the information practices and other terms set forth in this Privacy Statement.

+How We Collect and Use Personal Information

"Personal Information" means information that can be used to identify you as a person. We collect several categories of Personal Information through our Activities, including information you provide, information collected automatically, and information obtained from third-party sources. We generally use the Personal Information that we collect to operate the various functions of Duke University and provide Activities that may be available to you.

We rely on separate and overlapping lawful bases to collect and process your Personal Information depending on the processing activity. These lawful bases include: processing that is necessary to fulfill a contract, processing required to comply with a legal obligation, processing you have consented to, protection of an individual's vital interests, or to further Duke's legitimate interests.

The ways in which we collect and process your information vary depending on the relationship between you and Duke, as well as the specific Duke function with which you interact. The Privacy Statement sub-sections contained herein are intended to describe in more detail our collection and use practices for a number of these relationships and functions.

+Your Rights

We process all Personal Information consistent with your rights, and in each case to the extent required by and in accordance with applicable law.

European Economic Area (EEA) and United Kingdom (UK)-specific rights, or as otherwise deemed applicable by Duke

Upon request, if you are an individual located in the EEA or UK, depending on the processing activity, you have the right to:

- Access details of your Personal Information that we hold and how it is being collected, used and shared.
- Rectify any of your Personal Information that is inaccurate or incomplete.
- Restrict or limit the processing of your Personal Information.
- Object to the processing of your Personal Information for certain purposes.
- Request the deletion of your Personal Information, under certain circumstances.
- Obtain a copy of your Personal Information in an easily accessible format.
- Withdraw your consent to Duke collecting, using, and sharing your Personal Information.

Please note that, in certain cases, we may have a lawful basis to continue to process your Personal Information after you have withdrawn consent, including when necessary to protect your health and safety. In addition, withdrawing your consent will not affect the lawfulness of our collecting, using, and sharing of your Personal Information up to the point in time that you withdrew your consent.

To submit a request to exercise these or other rights, please contact us as set forth in the **Contact Us** section below. We will respond to your request within a reasonable time and in accordance with any deadlines imposed by law.

If you have any complaints regarding our privacy practices, we ask that you contact Duke Privacy, as set forth in the **Contact Us** section below. You also have the right to lodge a complaint with your national data protection authority (i.e., supervisory authority).

+Children

It is our policy that we do not intend to collect, and we will not knowingly collect or solicit, Personal Information online from children under the age of 13 or as defined by local legal requirements, except on Activities specifically directed to children. For those Activities, we follow applicable data protection laws with respect to children's privacy, as set forth in the additional disclosures posted within the relevant Activity.

+Uses of Personal Information

In addition to the uses described herein, including, but not limited to, under "Purposes of Processing" and "Information We Obtain from Third-Party Sources," we may use your Personal Information for the following purposes in order to serve our legitimate interests, comply with legal or contractual obligations, or in some cases, in accordance with your consent.

Uses of Personal Information

- Conducting our operations, administering the Activities and managing your accounts;
- Contacting you to respond to your requests or inquiries;
- Processing and completing your transactions including, as applicable, course registration, order confirmation, enrollment in academic groups or other programs, processing

payments for online and/or physical purchases and course registration, and delivering products or Activities;

- Providing you with newsletters, articles, service alerts or announcements, event invitations, and other information that we believe may be of interest to you;
- Providing you with promotional information, offers, and other information that are personally tailored to your interests;
- Conducting market research, surveys, and similar inquiries to help us understand trends and needs of our users;
- Providing for your health, safety, and security;
- Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Information, our website or data systems; or to meet compliance, fraud prevention or legal obligations;
- Enforcing our Terms of Use and other agreements; and
- Sending you text messages or push notifications when you sign up for one of our messaging programs. These messages may be sent by automated means. You may opt out of a text message program by contacting us.

Additional categories of Personal Information collected in our Activities and purposes of processing the information is available at **Additional Categories of Personal Information Collected**.

+Legitimate Interests

We rely on several legitimate interests in processing your Personal Information. These interests include:

- Improving and customizing the Activities for you
- Understanding how the Activities are being used
- Obtaining insights into usage patterns of the Activities
- Exploring ways to develop and grow our operations
- Ensuring the safety and security of the Activities
- Conducting research and improving understanding in fields of public interest and health
- Detecting, suppressing or enhancing protection against fraud, spam, harassment, intellectual property infringement, crime and security risks

+Information We Collect Through Website Use

Duke collects Personal Information that you provide to us, such as when you enter information into form fields on our Activities. In addition, as is true of most digital platforms, Duke gathers certain of your information automatically through various Internet technologies when you use our Activities. Specific information collected through website use may include:

Device Information

We may collect information about the computer, mobile device, or other device you use to access Duke's Activities, such as your computer's unique IP address, geolocation information, unique device identifiers, browser type, browser language and other transactional information.

Cookies, Beacons, Pixels, Local Storage and Other Similar Technologies

Duke uses "cookies," Web beacons, HTML5 local storage, and other similar technologies. These technologies allow us to manage access to and use of our Activities, recognize users and provide personalization, track user interactions of our Activities, and help us to understand how users engage with Duke Activities. You will not be able to access certain areas of our websites if your computer does not accept cookies from us. We do not respond to browser-based "do not track" signals.

Analytics Technologies

We use a third-party service such as Google Analytics to provide us information, reports, and analysis about the usage and user browsing patterns on our web pages. Google Analytics tracks and analyzes non-personally identifiable usage and volume statistical information from our visitors and customers on our websites. All data collected by Google Analytics on our behalf is owned and used by us.

Location Information

If you enable the location-based feature on our Activities, your current location will be stored locally on your device, which will then be used by the application. If you elect to have a location-based search saved to your history, we will store that information on our servers.

Email Tracking Pixels

Certain Duke Activities may use a function in HTML emails to track which users open emails and which links they click.

Ads Within Our Applications

The ads you see may be targeted to you based on your current GPS location, proximity of your device to an active beacon or low-energy blue-tooth transmitter, your device's IP address or ZIP code, and user-provided Personal Information and location data.

+How We Share and Disclose Personal Information

We may share your Personal Information, consistent with this Privacy Statement, within our family of schools, centers, institutes, and other Duke entities and affiliates, with service providers and partners, to comply with the law, improve our security, prevent fraud, protect your or other's health and safety, and enforce our legal rights. We share your Personal Information with third parties as set forth in this Privacy Statement.

Service Providers and Professional Advisors

We share your Personal Information with third-party service providers and professional advisors who complete transactions or perform or administer Activities on our behalf or for your benefit, such as:

- Educational Activities, including admissions, registration, evaluation, and alumni engagement
- Analytics and insights, including for marketing and research
- Employment Activities, including human resources
- Event ticketing, registration and payment, including sporting, theater, and other campus Activities
- Payment and donation processing

Partners

We may share your Personal Information with our partners for the purposes of administering programs and Activities, including but not limited to:

- Cross-registration for courses with other universities
- Study abroad at foreign universities
- Online education offerings through online platforms
- Joint research arrangements with sponsors, other hospitals and universities
- Events with clubs, athletic associations, and special interest groups

Regulatory Bodies, Consortium and Licensing Bodies

We may be required to share your Personal Information with government agencies or accreditation organizations for compliance and regulatory purposes. We may also share your Personal Information with groups or organizations that share resources and information, such as academic or research consortiums. We may also share your Personal Information with other institutions, athletic conferences, associations, and licensing bodies, for marketing and ticketing purposes, to administer, promote or enhance our services, support our Activities, qualification verification, or to meet standards and regulations.

Third-Party Mobile Application Providers

With your knowledge and consent, the Activities may gather and transfer your Personal Information, including location information, from and to other applications, functions and tools within your mobile device.

Social Media Platforms

We may also use Activities provided by third parties (such as social media platforms) to serve targeted ads to you on third-party platforms. We may do this by providing a hashed version of your Personal Information to the third party for matching purposes.

Legal Process, Safety and Terms Enforcement

We may disclose your Personal Information to legal or government regulatory authorities as required by applicable law. We may also disclose your Personal Information to third parties as

required by applicable law including in connection with claims, disputes or litigation or if we determine its disclosure is necessary to protect the health, safety, and security of you or us, or to enforce our legal rights or contractual commitments that you have made. The Personal Information we disclose for fraud prevention and security purposes may also be used by our service providers, partners, or third parties to improve their fraud prevention services.

+Information We Collect from Third-Party Sources

We may collect certain Personal Information about you from third-party sources in order to administer our Activities. Third-party sources include partners and service providers, such as payment processors, application aggregators, analytics providers, third-party platforms through use of single sign-on, and other third-party sources such as credit reference agencies and public databases.

+Links to Third-Party Sites and Social Media

The Activities may include links to websites and digital Activities operated by third parties, as well as "like" buttons and widgets hosted by other companies, that allow us to better understand website usage and communicate information to our users across multiple online platforms. Duke is not responsible for the content, privacy policies or data practices of third parties that collect your information. We encourage you to review the privacy policies for those third parties to learn about their information practices.

+International Data Transfers

Duke may transfer your Personal Information within our family of schools, centers, institutes, and other Duke entities and affiliates and/or to the third parties discussed above. In addition, your Personal Information may be transferred to, stored, and processed in a country other than the one in which it was collected, in which case, we rely on appropriate and reasonable safeguards to protect your information in accordance with applicable data protection laws.

If your Personal Information was collected or stored in another country, we may transfer your Personal Information outside of that country, and when we do so, we rely on appropriate or suitable safeguards recognized under data protection laws, including, but not limited to, adequacy decisions, standard contractual clauses, your consent, or by contract.

+Data Retention

We will retain your Personal Information only for as long as is necessary for our purposes set out in this Privacy Statement or in alignment with your consent, subject to certain rights you may have that are described in this Statement (see **Your Rights**), unless a longer period is required under applicable law or is needed to resolve disputes or protect our legal rights.

+Updates to the Privacy Statement

This Privacy Statement is subject to occasional revision. If we make any material changes in the way we use your Personal Information, we will notify you by sending you an email to the last email address you provided to us and/or by prominently posting notice of the changes on the Activities and updating the effective date above.

CONTACT US

+Contact Us

If you have any questions, comments, requests or concerns about this Privacy Statement or other privacy-related matters, you may contact us in the following ways:

Email: privacy@duke.edu

Phone: 919-684-2144

Address: Duke Privacy

Office of Audit, Risk & Compliance

Box 90436

705 Broad Street, Suite 210

Durham, NC 27708

For all inquiries related to the European Union General Data Protection Regulation ("GDPR"), you may direct these to the Duke University Data Protection at privacy@duke.edu.

Data Protection Officer: Leigh P. Goller, Chief Audit, Risk and Compliance Officer

You may also direct GDPR inquiries to Duke University's Article 27 Representative:

Irene Lau, Executive Assistant
Duke Corporate Education Limited
165 Fleet Street
London EC4A2DY
United Kingdom

To exercise data subject privacy rights that may be available to you, please use this form. Instructions for submission are included on the <u>form</u>.

ADDITIONAL CATEGORIES OF PERSONAL INFORMATION COLLECTED

+Website Use

We and our partners, vendors, and service providers, may collect the following Personal Information through your website use:

- Contact information
- Log files (including IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp, and/or clickstream data)
- Location information (we may use your IP address to identify the general geographic area from which you are accessing duke.edu)
- Payment information
- Purchase information

The purposes of processing by each category of Personal Information include to respond to requests for information, fraud prevention and detection, to maintain the security of our Activities, to conduct analytics to improve the Activities, and with your consent, if applicable.

+Admissions & Financial Aid

Information collected by us, or on our behalf, during the admissions process and throughout any subsequent enrollment as a student at Duke is collected for the primary purpose of considering your application for admission to Duke, evaluating your eligibility for financial aid and, if you are admitted, facilitating your education. Aggregated data derived from this information may be utilized for statistical reporting. Personal Information collected for Admissions and Financial Aid includes:

- Contact Information
- Demographic Information
- Education, Testing, Personal, and Employment History
- Criminal Record
- Personal Financial Information
- Family Financial Information

The purposes of processing by each category of Personal Information include to respond to requests for information, communicate with you, and to evaluate your eligibility for admission and financial aid.

+Alumni

The primary way Duke collects and maintains Personal Information about alumni is when you provide it to us, for example, when you update your alumni profile, connect with us on social media, or register to attend alumni events. We may also collect Personal Information from publicly available sources or third-party sources that support Duke or with whom Duke engages.

The main purpose for Duke's collection of alumni Personal Information is to connect you with Duke, other alumni, Duke students and potential students. Personal Information collected about alumni includes:

- Contact Information
- Demographic Information
- Employment Information
- Duke Affiliations
- Personal Information
- Family Information

The purposes of processing by each category of Personal Information include to respond to requests for information, communicate relevant information, and connect you with alumni and students.

+Donors

Duke collects and maintains donor Personal Information to process donations and respond to comments and questions. We may also use donor information to keep you informed about Duke events and initiatives that may interest you.

The main way we collect donor Personal Information is when you provide it to us, for example, when you complete a donation form or request information regarding donations. We may also collect Personal Information from publicly available sources or third-party sources that support Duke or with whom Duke engages. Personal Information collected about donors include:

- Contact Information
- Donation Information
- Payment Information

The purposes of processing by each category of Personal Information include to communicate with and provide information to you regarding donations and to process and confirm your donations.

+Human Resources

Duke collects your Personal Information when you apply for employment. Further Personal Information collection occurs at the commencement and throughout your employment at Duke.

Personal Information collected by Duke, or on our behalf, is collected for the primary purpose of providing employment or enabling authorized persons to utilize Duke's services, Activities, and facilities. Personal Information collected by Human Resources includes:

- Contact Information
- Demographic Information
- Payment Information

Duke | Office of Audit, Risk and Compliance

Duke University Privacy Statement May 16, 2025

- Tax Information
- Employment History
- Education History
- Criminal Records
- Background Records

The purposes of processing by each category of Personal Information include to provide you with employment-related notices, forms, and payments, and to evaluate your application for employment.

+Online Education

Duke collects your Personal Information when you apply for online education offerings. Further Personal Information collection occurs at the commencement of and throughout your online education interactions.

Personal Information collected by Duke, or on our behalf, is collected for the primary purpose of providing online education courses and, if applicable, evaluating qualification for online education certificates and credit. Personal Information collected through Online Education includes:

- Contact Information
- Payment Information
- Tax Information
- Employment History
- Education History
- Criminal Records
- Learner Interaction Data
- Course Assessment Data
- Log Files
- Location Information
- Biometric Data

The purposes of processing by each category of Personal Information include to communicate with you regarding your program, respond to requests, process payments, evaluate your application for online education, evaluate your success and engagement in Online Education, provide you with location-based services, and provide secure, remote online testing platforms.

+Non-credit Education

Duke collects your Personal Information when you are involved in non-credit, executive education and personal enrichment courses offered in person and online by Duke and our affiliates. Further Personal Information collection occurs at enrollment and throughout your non-credit education interactions.

Personal Information collected by Duke and our affiliates, or on our behalf, is collected for the primary purpose of providing non-credit education and ongoing communication. Personal Information collected through Non-credit Education includes:

- Contact Information
- Education History
- Assignment and Testing History
- Disability Information
- Dietary Information
- Residential Information
- Personal History
- Employment History
- Personal Financial Information
- Family Financial Information
- Payment Information
- Location Information
- Biometric Data

The purposes of processing by each category of Personal Information include to respond to requests for information, provide academic guidance and experiences, evaluate your eligibility for financial aid and courses, and provide secure online testing platforms.

+Research

Duke researchers and affiliates may collect, use and share your Personal Information as part of a research study in which you have consented to participate as a research subject or researcher, or in which your existing personal data are used. Often, when personal data are collected for research purposes, you will be provided a consent and/or authorization form that explains the types of data collected and the purposes for which such data are processed and shared. In such case, the description of the collection and use of your Personal Information provided in the consent and/or authorization form will replace the information provided here.

Examples of data that may be collected for research purposes are listed below. These data categories are provided as examples only; not every research study will collect each of these categories of data. If you have questions about the processing of your data in connection with a research study, you should contact the Duke personnel who are conducting the research or the contact persons named in any informed consent form you signed when you joined the study. Examples of Personal Information collected through Research include:

- Contact Information
- Tax Information
- Family Information
- Employment History
- Education History
- Criminal Records

Duke | Office of Audit, Risk and Compliance

Duke University Privacy Statement May 16, 2025

- Demographic Information
- Health Records
- Biometric Data
- Genetic Data
- Log Files

The purposes of processing by each category of Personal Information include to enroll you in a research study, conduct research, and maintain the security of our systems.

+Students

The information collected by us, or on our behalf, throughout your enrollment as a student at Duke is collected for the primary purpose of facilitating your education at Duke and providing the programs for which you are enrolled. Personal Information may also be utilized for quality improvement research and analysis to evaluate program utilization and performance to improve education quality. Personal Information collected as a result of your enrollment as a student includes:

- Contact Information
- Demographic Information
- Education History
- Assignment and Testing History
- Health Records
- Disability Information
- Dietary Information
- Residential Information
- Personal History
- Employment History
- Criminal Record
- Personal Financial Information
- Family Financial Information
- Athletic Participation Records

The purposes of processing by each category of Personal Information include to respond to requests for information, provide academic guidance, evaluate your eligibility as a student and for financial aid, and to provide a safe and secure experience as a student.

+Patients

Duke Health and its affiliates may collect certain information to facilitate the process of your becoming a patient for treatment at Duke Health. When you first present for care at a Duke Health facility, you will generally be provided a separate Notice of Privacy Practices that explains in more detail the types of data collected and the purposes for which such data are processed and shared by Duke Health. That notice will be controlling regarding the data collected during the course of your treatment at Duke Health. If you have additional questions about the processing of your data in connection with your becoming a patient at Duke Health, you should

contact the Data Protection Officer using the contact methods provided in the **Contact Us** section. Examples of Personal Information that may be collected as a Patient include:

- Contact Information
- Health Records
- Family Information
- Insurance History
- Demographic Information
- Financial Information
- Log Files

The purposes of processing by each category of Personal Information include to provide you with medical care, process insurance and payment, and communicate with you regarding your healthcare.

For more information on Duke Health websites and mobile applications: <u>Duke Health Online Privacy Policy</u>

+Duke University Press Customers

Duke University Press collects and maintains Personal Information about purchasers of items to facilitate purchases and respond to your comments and questions. We may also use your information to keep you informed about Duke University Press products that may interest you. Personal Information that may be collected as a Duke University Press Customer includes:

- Contact Information
- Payment Information

The purposes of processing by each category of Personal Information include to provide you with transaction information and to process your transactions.