

# Duke University Privacy Policy

Effective Date: May 11, 2018

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## Introduction

We respect your privacy and are committed to protecting it through our compliance with this policy. This Privacy Policy is applicable when jurisdictions requiring additional notice requirements and describes how we at Duke University and Duke's Schools, Centers, and other Duke units and affiliates, and Duke Health, (collectively, "we" or "Duke") collect, use and share the Personal Information that we gather by any means, including hardcopy (such as, paper applications or forms) and electronic means (such as, websites, mobile apps, and other digital properties), that are owned and operated by Duke and that link to or reference this Privacy Policy (collectively, the "Services").

All Duke Schools, Centers, and other Duke units and affiliates may run and maintain their own websites on either the Duke.edu domain or organization-specific domains. These sites may carry their own privacy notices or provide additional information relating to their activities, which will supersede or supplement this Privacy Policy. For further information about Duke's web presence, please see the Duke University Privacy Statement.

If you have any questions about this Privacy Policy or our information practices, please contact us using the options set forth in the **Contact Us** section.

**Please read this Privacy Policy carefully. By using our Services, you consent to the information practices and other terms set forth in this Privacy Policy.**

## How We Collect and Use Personal Information

When we use the term "**Personal Information**," we mean information that can be used to identify you as an individual person. We collect several categories of Personal Information through our Services, including information you provide, information collected automatically (potentially including location information), and information we obtain from third party sources.

We generally use the Personal Information that we collect to operate the various functions of this institution and provide the Duke services that may be available to you.

We rely on separate and overlapping bases to process your Personal Information lawfully. By way of example only, it may be necessary for us to process your Personal Information in certain ways in order to process a transaction you have requested or otherwise in accordance with a contract between us, or in certain cases we may process your Personal Information as necessary to conduct Duke's legitimate interests, when those legitimate interests are not overridden by your rights and interests.

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

### Website

Duke collects Personal Information you provide, for example, when you enter the information into form fields on our Services. As is true of most digital platforms, we also gather certain information automatically when you use our Services. For example, we and our vendors may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<b>Contact Information</b> including your name, home address, email address and phone number	To respond to requests for information from you and communicate with you	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Log Files</b> including IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data	To maintain the security of our Services, for fraud detection, and to protect our rights	Legitimate interests
<b>Location Information</b> We may use your IP address to identify the general geographic area from which you are accessing Duke.edu.	To conduct analytics to improve the Services, track user trends, and create custom audience lists. We connect data from different systems but do not link IP addresses to any personal information.	Legitimate interests  Your consent, if applicable

### Admissions & Financial Aid

The 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. For example, we may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<b>Contact Information</b> including your name, home address, email address and phone number	To respond to requests for information from you and communicate your application status and decision; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Demographic Information</b> including race, ethnicity, gender, age, and marital status	To evaluate the application process and provide you with information regarding diversity initiatives and engagement opportunities; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests

		Your consent, if applicable
<b>Education History</b> including your prior schools, transcripts, school activities, and disciplinary records	To evaluate your eligibility for admission; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Testing History</b> including standardized testing	To evaluate your eligibility for admission; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Personal History</b> including interests, extracurricular activities, and recommendations	To evaluate your eligibility for admission; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Employment History</b> including job title, location, and work experience	To evaluate your eligibility for admission; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Criminal Record</b> including your self-reported and public record	To evaluate your eligibility for admission; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Personal Financial Information</b> including tax identification number, wages, scholarships and grants, and family support	To evaluate your eligibility for financial aid; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests

		Your consent, if applicable
<b>Family Financial Information</b> including family member names, ages, occupations, wages, and savings	To evaluate your eligibility for financial aid; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable

### Alumni

The main 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.

The main purpose for Duke’s collection of alumni personal information is to connect you with Duke and other alumni. For example, we may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<b>Contact Information</b> including your name, home address, email address and phone number	To respond to requests for information from you and communicate relevant alumni information and events; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Employment Information</b> including your title, employer, location, and work experience	To connect you with alumni and students in similar employment fields and provide ongoing employment guidance; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Duke Affiliations</b> including your academic records, group memberships, and Duke-related correspondence	To provide an accurate academic record to you upon request and connect you with alumni and students with similar academic records and interests; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Personal Information</b> including personal interests, religious affiliation, and political affiliation	To connect you with alumni and students with similar interests, religious affiliations and political	To process transactions requested by you and meet our contractual obligations

	affiliations; to respond to records requests	Legitimate interests  Your consent, if applicable
<b>Family Information</b> Including family member names, ages, occupations, and relevant medical information	To provide other alumni and students with information you wish to share and provide family support during alumni events; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable

### Donors

Duke collects and maintains personal information about donors to process your donation and respond to your comments and questions. We may also use your information to keep you informed about Duke events and initiatives that we think may interest you.

The main way we collect personal information about you is when you give 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. For example, we may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<b>Contact Information</b> including your name, home address, email address and phone number	To provide confirmations of donations, respond to requests for information from you and provide you with information regarding Duke events and initiatives; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Payment Information</b> including your payment card number, bank account number, and routing number	To process your donations	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable

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.

The 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 and facilities. For example, we may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<b>Contact Information</b> including your name, home address, email address and phone number	To provide employment-related notices, forms and payments	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Payment Information</b> including your bank account number and routing number	To process direct deposit payments	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Tax Information</b> including tax identification number, wages and filing status	To process your tax withholdings and file required forms with tax authorities	To process transactions requested by you and meet our contractual obligations  Legal compliance  Legitimate interests  Your consent, if applicable
<b>Employment History</b> including prior employers, titles, wages, work experience, and disciplinary record	To evaluate your application for employment and assess qualification for promotions and raises	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Education History</b> including prior schools, transcripts, awards, honors and disciplinary records	To evaluate your application for employment	To process transactions requested by you and meet our contractual obligations

		Legitimate interests Your consent, if applicable
<b>Criminal Records</b> including self-reported records and publicly available records	To evaluate your application for employment	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable

### 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.

The 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. For example, we may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<b>Contact Information</b> including your name, home address, email address and phone number	To register you for courses and communicate with you regarding your program enrollment; to respond to records requests	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
<b>Payment Information</b> including your payment card, bank account number and routing number	To process payment for program registration; to respond to records requests	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
<b>Tax Information</b> including tax identification number	To provide required information to tax authorities; to respond to records requests	To process transactions requested by you and meet our contractual obligations Legal compliance Legitimate interests

		Your consent, if applicable
<b>Employment History</b> including prior employers, titles, wages, work experience, and disciplinary record	To evaluate your application for certain online education offerings; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Education History</b> including prior schools, transcripts, awards, honors and disciplinary records	To evaluate your application for certain online education offerings; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Criminal Records</b> including self-reported records and publicly available records	To evaluate your application for certain online education offerings; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Learner Interaction Data</b> including profile information, blog posts and community posts	To publish your messages to the online education platform; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Course Assessment Data</b> including assignment responses, test scores, and course interactions	To evaluate your success in the online education offering; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Log Files</b> including IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data	To evaluate your engagement with the course, maintain the security of our Services, detect fraud, and protect our rights	Legitimate interests



<b>Location Information</b> including latitude, longitude, date and time (the precision of this data varies greatly and is determined by factors controlled by your device or mobile service provider)	To offer you certain location-based services, such as delivering advertisements that are relevant to your particular location, and to conduct analytics to improve the Services	Legitimate interests  Your consent, if applicable
<b>Biometric Data</b> Including facial measurements and eye movement	To provide secure, remote online testing platforms for course evaluations	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable

## Research

Duke researchers and affiliates may collect, use and share your personal information as part of a research study in which you have agreed 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 a 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.

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<b>Contact Information</b> including your name, home address, email address and phone number	To enroll you in a particular research study as a research subject or to administer the study if you are a researcher	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Tax Information</b> including tax identification number	To report earnings from research participation as a research subject or researcher to the tax authorities	To process transactions requested by you and meet our contractual obligations  Legal compliance  Legitimate interests

		Your consent, if applicable
<b>Family Information</b> including family members, ages, occupations, and health	To conduct research and improve understanding in fields of academic research	To process transactions requested by you and meet our contractual obligations  Legitimate interests  To protect your vital interests  Your consent, if applicable  For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
<b>Employment History</b> including prior employers, titles, wages, work experience, trade union membership, and disciplinary record	To conduct research and improve understanding in fields of academic research	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable  For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
<b>Education History</b> including prior schools, transcripts, awards, honors and disciplinary records	To conduct research and improve understanding in fields of academic research	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Criminal Records</b> including self-reported records and publicly available records	To conduct research and improve understanding in fields of academic research	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable

<p><b>Demographic Information</b> including race, ethnicity, gender, age, education, profession, occupation, income level, and marital status</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>
<p><b>Health Records</b> including doctor's records, surgical records, immunizations, and medications</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>
<p><b>Biometric Data</b> including facial measurements, finger prints, and eye movement</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>
<p><b>Genetic Data</b> Including genetic information obtained from your biological samples</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p>

		<p>Legitimate interests</p> <p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>
<p><b>Log Files</b> including IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>

## 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. For example, we may collect:

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<p><b>Contact Information</b> including your name, home address, email address and phone number</p>	<p>To respond to requests for information from you and communicate academic-related announcements, including grades, tuition bills, and program offerings</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Education History</b> including your prior schools, transcripts, school activities, and disciplinary records</p>	<p>To provide academic guidance and evaluate your eligibility for a degree</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Assignment and Testing History</b> including course grades and standardized testing</p>	<p>To evaluate your eligibility for a Duke degree</p>	<p>To process transactions requested by you and meet our contractual obligations</p>

		<p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Health Records</b> including doctor's records, surgical records, immunization records, vaccinations and medications</p>	<p>To provide you with health care and protect the health and safety of the student body</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Disability Information</b> including physical and mental disabilities</p>	<p>To provide you with proper accommodations</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Dietary Information</b> including allergies and food preferences</p>	<p>To provide proper dietary options at Duke dining halls</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Residential Information</b> including personal preferences, security key card activity, facility monitoring and personal monitoring</p>	<p>To provide a safe and secure residential experience for all students</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Personal History</b> including interests and extracurricular activities</p>	<p>To connect you with other students and alumni with similar interests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p><b>Employment History</b> including job title, location, and work experience</p>	<p>To evaluate your eligibility for financial aid and provide assistance when needed</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p>

		Your consent, if applicable
<b>Criminal Record</b> including your self-reported and public record	To evaluate your compliance with the Student Handbook and provide assistance when needed	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Personal Financial Information</b> including tax identification number, wages, scholarships and grants, and family support	To evaluate your eligibility for financial aid and file required forms with tax authorities	To process transactions requested by you and meet our contractual obligations  Legal compliance  Legitimate interests  Your consent, if applicable
<b>Family Financial Information</b> including family member names, ages, occupations, wages, and savings	To evaluate your eligibility for financial aid	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable

Patients

Duke Health and its affiliates may collect certain information to facilitate the process of your becoming a patient for treatment at Duke Health, such as your contact information, medical records, and insurance. 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 below in the **Contact Us** section.

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<b>Contact Information</b> including your name, home address, email address and phone number	To notify you of upcoming appointments, process payments, and maintain health records	To process transactions requested by you and meet our contractual obligations  Legitimate interests

		Your consent, if applicable
<b>Health Records</b> including doctor's records, surgical records, immunizations, medications, genetic testing information, and biometric information	To treat you	To process transactions requested by you and meet our contractual obligations  Legitimate interests  To protect your vital interests  Your consent, if applicable  For diagnosis and treatment
<b>Family Information</b> including family members, ages, occupations, and health	To treat you and maintain accurate health records	To process transactions requested by you and meet our contractual obligations  Legitimate interests  To protect your vital interests  Your consent, if applicable  For diagnosis and treatment
<b>Insurance History</b> including prior insurance subscriber, employers, and trade union membership	To process insurance coverage and payment for treatment	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable  For diagnosis and treatment
<b>Demographic Information</b> including race, ethnicity, gender, age, education, profession, occupation, income level, marital status, and spouse name, address, medical record number and tax identification number	To treat you and maintain accurate health records	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable  For diagnosis and treatment

<b>Financial Information</b> Including salary, wages, household income, tax records, and tax identification number	To process financial assistance and payment for treatment	To process transactions as requested by you and meet our contractual obligations  Legitimate interests  You consent, as applicable
<b>Log Files</b> including IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data	To notify you of upcoming appointments, process payments, and maintain health records	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable

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 we think may interest you.

<i>Category of Personal Data</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<b>Contact Information</b> including your name, home address, email address and phone number	To provide confirmations of transactions, respond to requests for information from you and provide you with information regarding Duke events and initiatives; to respond to records requests	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable
<b>Payment Information</b> including your payment card number, bank account number, and routing number	To process your transactions	To process transactions requested by you and meet our contractual obligations  Legitimate interests  Your consent, if applicable



## **Information We Obtain from Third Party Sources**

We may obtain certain Personal Information about you from third party sources, which we may use to serve our legitimate interests, comply with legal obligations, perform a contract, or in some cases, in accordance with your consent.

### Partners and Service Providers

We use partners and service providers, such as payment processors and analytics providers, to perform services on our behalf. Some of these partners have access to Personal Information about you that we may not otherwise have (for example, if you sign up directly with that provider) and may share some or all this information with us. We use this information to administer the Services and conduct marketing and advertising campaigns as well as to process transactions that you request.

### Single Sign-On

Some of our Services allow you to register and login to our Services through a third-party platform. When you choose to login to our service through a third-party platform, you allow us to access and collect any information from your third-party platform account permitted under the settings and privacy policy of that platform. We use this information to deliver this functionality and the Services to you.

### Supplemental Information

We may receive additional Personal Information from third-party sources, such as credit reference agencies and public databases, which we may append to existing personal information, such as email address verification. We may use this supplemental information to process transactions that you request and to prevent fraud, deliver relevant offers and advertising to you and to improve our operations, Services and our advertising and marketing campaigns.

## **Additional Uses of Personal Information**

In addition to the uses described above, 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, which uses may under certain circumstances be based on your consent, may be necessary to fulfill our contractual commitments to you, and are necessary to serve our legitimate interest in the following operations:

- Conducting our operations, administering the Services 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 purchases and course registration, and delivering products or services;
- 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;
- Alerting you about a safety announcement;

- 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 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 following the instructions in the **Managing Communication Preferences** section.

## Legitimate Interests

We rely on several legitimate interests in using and sharing your Personal Information. These interests include:

- improving and customizing the Services for you;
- understanding how the Services are being used;
- obtaining insights into usage patterns of the Services;
- exploring ways to develop and grow our operations;
- ensuring the safety and security of the Services;
- conducting research and improving understanding in fields of public interest and health; and
- enhancing protection against fraud, spam, harassment, intellectual property infringement, crime and security risks.

## Data Retention

We will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy, subject to your right, under certain circumstances, to have certain of your Personal Information erased (see **Your Rights** below), unless a longer period is required under applicable law or is needed to resolve disputes or protect our legal rights.

## How We Share and Disclose Personal Information

We share your Personal Information with third parties only in the ways described in this Privacy Policy. We may share your Personal Information within our family of schools, centers, and other Duke units and affiliates, with service providers and partners, and to comply with the law, protect health and safety and enforce our legal rights.

### Service Providers

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

- Payment and donation processing
- Marketing and analytics
- Processing employment applications
- Processing admissions applications
- Alumni outreach and engagement
- Event registration and coordination
- Course registration and coordination
- Course evaluations and assessments
- Research insights and analytics
- Performing human resources administration

### Affiliates

We may share your Personal Information with affiliated legal entities within our schools, centers, and other Duke units and affiliates for purposes and uses that are consistent with this Privacy Policy.

### Partners

We may share your Personal Information with our partners for the purposes of administering programs and services, such as:

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

### Third-Party Mobile App Providers

With your knowledge and consent, the Services 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 services 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 in connection with claims, disputes or litigation, when otherwise required by applicable law, or if we determine its disclosure is necessary to protect the health and safety of you or us, or to enforce our legal rights or contractual commitments that you have made.

## International Data Transfers

Duke may transfer your Personal Information within our family of schools, centers, and other Duke units and affiliates and/or to the third parties discussed above. Your Personal Information may be transferred to, stored, and processed in a country other than the one in which it was collected.

If your Personal Information was collected or stored in the European Economic Area (“**EEA**”), we may transfer your Personal Information outside the EEA and when we do so, we rely on appropriate or suitable safeguards recognized under data protection laws.

### Adequacy Decision

We may transfer your Personal Information to Andorra, Argentina, Canada (commercial organizations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the United States (limited to those transfers governed by the EU-U.S. Privacy Shield

framework), and any other countries that the European Commission has approved as providing adequate protection to personal information.

### Standard Contractual Clauses

The European Commission has adopted standard data protection clauses, which provide safeguards for personal information transferred outside of the EEA. We may use Standard Contractual Clauses when transferring Personal Information from a country in the EEA to a country outside the EEA. You can request a copy of our Standard Contractual Clauses by contacting us as set forth in the **Contact Us** section below.

### With Your Consent

In respect of certain cross-border personal data transfers, we will obtain your consent to transfer your Personal Information outside the EEA after first informing you about the possible risks of such a transfer.

### By Contract

We will transfer your Personal Information outside the EEA if the transfer is necessary to the performance of a contract between you and Duke, or if the transfer is necessary to the performance of a contract between Duke and a third party, and the contract was entered into in your interest.

### Additional Considerations

In addition, we may transfer your Personal Information outside the EEA if the transfer is necessary to establish, exercise or defend legal claims or to protect your vital interests.

## Children

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 Services specifically directed to children. For those Services, we follow applicable data protection laws with respect to children's privacy, as set forth in the additional disclosures posted within the relevant Service.

## Your Rights

We process all personal information in line with your rights, in each case to the extent required by and in accordance with applicable law (including in accordance with any applicable time limits and fee requirements).

### EEA-Specific Rights

Upon request, we will provide you with information about whether we hold any of your Personal Information along with any details required to be provided to you under applicable law. In certain cases, you may also have a right to:

- rectify any of your Personal Information that is inaccurate;
- to restrict or limit the ways in which we use your Personal Information;
- to object to the processing of your Personal Information;

- to request the deletion of your Personal Information, and
- to obtain a copy of your Personal Information in an easily accessible format.

To submit a request, please contact us as set forth in the **Contact Us** section below. We will respond to your request within a reasonable time.

You also have the right to withdraw your consent to our processing of your Personal Information, if our processing is solely based on your consent. You can do this by discontinuing use of the Services, including by closing all of your online accounts with us and contacting us as set forth in the **Contact Us** section below to request that your Personal Information be deleted. If, however, you provided consent in connection with participation in a research study, you should follow the instructions in the research consent form to withdraw your consent. If you withdraw your consent to the use or sharing of your Personal Information for the purposes set out in this Privacy Policy, you may not have access to all (or any) of the Services, and we might not be able to provide you all (or any) of the Services. Please note that, in certain cases, we may continue to process your Personal Information after you have withdrawn consent and requested that we delete your Personal Information, if we have a legal basis to do so. For example, we may retain certain information if we need to do so to comply with an independent legal obligation, or if it is necessary to do so to pursue our legitimate interest in keeping the Services safe and secure, or if deleting the information would undermine the integrity of a research study in which you are enrolled.

If you have any complaints regarding our privacy practices, we ask that you reach out to 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).

## Links to Third Party Sites and Social Media

The Services may include links to websites and digital services operated by third parties. This Privacy Policy does not apply to, and we are 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.

The Services may feature “like” buttons and widgets hosted by other companies. These features may collect your IP address, which page you are visiting on our Service and may set a cookie to enable the feature to function properly. The loading, functionality and your use of the plugins are governed by the privacy policy and terms of the third party that provided the plugin.

The Services may also allow you to log in using a social network or other third-party account. An example of a third-party login is “Log in with Facebook.” Logging into one of our Services with your social network or other third-party account may allow us to gather information that you give us permission to access from that social network or third party. The login feature may also transfer information to the social network or third party, such as your username and password, to authenticate you. The social network or third party may also automatically collect information such as your IP address, information about your browser and device, and the address of the web page you are visiting on our site. The login feature may also place and read cookies from that third party that may contain a unique identifier the social network or other third party assigns to you. The functionality of and your use of the login is governed by the privacy policy and terms of the party that provided the login functionality.

## User Generated Content

Some of our Services may enable users to submit their own content for courses, assignments, contests, blogs, videos, and other functions. Unless otherwise indicated, please remember that any information you submit or post as user-generated content to the Services becomes public information. You should exercise caution when deciding to disclose your personal, financial or other information in such submissions or posts. We cannot prevent others from using such information in a manner that may violate this Privacy Policy, the law, or your personal privacy and safety. We are not responsible for the results of such postings.

## Updates to the Privacy Policy

This Privacy Policy is subject to occasional revision, and 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 Services and updating the effective date above.

Any changes to this Privacy Policy will be effective upon the earlier of thirty (30) calendar days following our dispatch of an email notice to you or thirty (30) calendar days following our posting of notice of the changes on the Services. These changes will be effective immediately for new users of our Services.

Please note that at all times you are responsible for updating your Personal Information to provide us with your most current email address. In the event that the last email address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the email containing such notice will nonetheless constitute effective notice of the changes described in the notice.

If you do not wish to permit changes in our use of your Personal Information, you must so notify us prior to the effective date of the changes and discontinue using the Services. Continued use of our Services, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

## Managing Communication Preferences

If you have opted in to our marketing (or when permitted by law, if you have provided us with your contact information), we may send you email messages, direct mail, push notifications or other communications regarding educational offerings or other products or services depending on the method of communication selected. You may ask us not to do so when you access our websites or mobile applications, or change your preferences by updating any accounts you have with us. At any time, you may elect to discontinue receiving messages about these offerings, products, or services from us by submitting an opt-out request to the contact information below or by following the unsubscribe instructions in the form of the communication you received, as described below.

### Printed Materials

To opt out of receiving printed materials about our offerings, products, or services at your postal address, such as magazines, advertisements, flyers or postcards, please write to us at the address set forth in the **Contact Us** section below. Please be sure to include your name, mailing address

and description of the marketing material received exactly as they appear on the printed marketing materials you received.

### Emails

To opt out of receiving communications about our offerings, products, or services via email, please send an unsubscribe request to the email address set forth in the **Contact Us** section below or click on the unsubscribe link at the bottom of the email that was sent to you and follow the directions on the resulting web page. Please note that you may continue to receive certain transactional or account-related electronic messages from us.

### Text Messages

If you have consented to receive text messages, you may opt out of receiving them by using the method provided in the text message or by contacting us as set forth in the **Contact Us** section below.

### Push Notifications

To opt out of receiving push notifications, please set your preferences within your device setting menu.

## Contact Us

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

Email: [GDPR@duke.edu](mailto:GDPR@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, specifically direct these to the Duke University Data Protection at [GDPR@duke.edu](mailto:GDPR@duke.edu).

Data Protection Officer: David Falcone, Director, Privacy, Ethics & Compliance and University Compliance Officer