

The University of California

School of Veterinary Medicine

Statement of Privacy Practices – General Data Protection Regulation

1. Transparency Regarding the Use of Your Personal Data

As part of our commitment to protecting your privacy, this statement is designed to provide you with information regarding how the School of Veterinary Medicine (“SVM”), part of UC Davis, collects and processes the information you share when you use our website located at <https://www.vetmed.ucdavis.edu>, and each of its associated domains (together, the “Sites”), utilize the services of ours which include higher education, research, healthcare for animals, outreach and public service, or when you otherwise communicate with SVM (“SVM Services”). This statement is applicable to individuals using SVM Services who are located in the European Economic Area (“EEA”).

For purposes of the General Data Protection Regulation (“GDPR”), the data controller is the Regents of the University of California, with a location at 1 Shields Avenue, Davis, CA 95616.

2. Your Personal Data We Use

Information you provide directly to UC: SVM collects personal information about you called Personal Data. Your Personal Data is collected when you register or fill in a form on SVM Sites, or otherwise contact SVM. This includes information you provide when you register to use our Services, for example, applying for admission, subscribe to newsletters, place an order, or participate in discussion boards on our Services. Depending upon the specific SVM Service you use, the information you give us includes your:

- Aliases
- Citizenship information
- Citizenship status
- Computer cookies
- Credit card number
- Dependent information
- Driver's license
- E-mail address
- Emergency contact information
- Financial information
- Grades or academic records
- Identification numbers
- Location of birth

- Name
- Past names
- Personal photo (passport photo)
- Personnel and other human resources data
- Street address
- Tax/vendor id number
- Telephone numbers
- Test scores
- Transaction data
- Transcripts
- Usernames
- W-9 data

as well as any information about you that is associated with or linked to, or could be linked to, any of the foregoing data.

We also collect more sensitive information about you, with your explicit consent, where the processing is necessary to meet a legal or regulatory obligation, the processing is in connection with UC establishing, exercising or defending legal claims, or is otherwise expressly permitted by GDPR. This sensitive information includes:

- Biometric data
- Data concerning a person's sex life or sexual orientation
- Data concerning health
 - Health insurance
 - Respiratory questionnaire information for n-95 clearance
 - Vaccinations required for workplace
- Political opinions
- Racial or ethnic origin
- Religious or philosophical beliefs

Although we do not routinely request the following sensitive information, this information may be stored and processed when volunteered:

- Behavioral information
- Data relating to criminal convictions and offenses or related security measures
- Trade union membership

The information you give us also includes more sensitive information, such as information relating to a medical condition or a medical diagnosis, biometric information about you, or demographic information relating to you. This information is collected for purposes of preventive or occupational medicine, or to provide health or social treatment or services to you pursuant to a contract with a health professional bound by ethical requirements to maintain the confidentiality of your information.

Log, Cookie and Device Data: We also collect log data, which is information collected whenever you visit a website. This log data includes your Internet Protocol address, browser type and some settings, the date and time of your request, how you used the Service, and cookie data. Depending on how you are accessing the Services, we may use “cookies” (small text files stored by your computer when you visit our website) or similar technologies. For more detailed information about how we use cookies, please review our [Cookies Policy](#) or contact the UC Privacy Official identified below. In addition to log and cookie data, we also collect information about the device you’re using to access the Services, including what type of device it is, what operating system you are using, device settings, unique device identifiers and crash data. Whether we collect some or all of this information often depends on what type of device you are using and its settings. For example, different types of information are available depending on whether you are using a Mac or a PC, or an iPhone or Android phone. To learn more about what information your device makes available to us, please also check the policies of your device manufacturer or software provider.

Information from Other Sources: We also obtain information about you from other sources and combine that information with information we collect from you directly. For example, we purchase information from Dun & Bradstreet and Wealth Engine regarding prospective donors. The information we obtain from sources like these includes mailing address, phone numbers, email address, publicly held stocks, and philanthropic gift information that is in the public domain, as well as any information about you that is associated with or linked to, or could be linked to, any of the foregoing data.

3. How We Use Your Personal Data and the Lawful Basis for Such Processing

SVM processes your Personal Data for the following purposes and bases:

- Evaluating your eligibility for admission into the SVM and its affiliated graduate education programs/groups. This is generally required under the contract we have with you;
- Assessing/appraising our process for evaluating applicants for admission into the SVM and its affiliated graduate education programs/groups. It is in our legitimate interest as an institution of higher learning to understand and improve our processes;
- Processing your donations to the SVM. This is generally required to process a transaction requested by you;
- Providing you with information regarding SVM events and initiatives. We will generally only do this where it is in our legitimate interest and where you have not objected or withdrawn any prior consent given;
- Processing and dealing with any complaints or inquiries made by you or legally on your behalf. We do this because it is in our legitimate interest as part of the services SVM offers to you;
- SVM may also be required to disclose your Personal Data to authorities who can request this information by law that is binding on UC;

- Utilizing sensitive personal data in connection with SVM Services, with your consent;
- Processing personal information for accounts payable, including buying goods and services, reimbursements, and establishing contracts. This is generally required to process a transaction requested by you;
- Processing personal information for accounts receivable for services rendered. This is generally required to process a transaction requested by you;
- Collection of personal information for the purpose of academic or research collaboration. This is generally done with your consent.
- Processing of personal data for employment. This is generally required under the contract we have with you;
- Processing of personal information for grant applications, awards and collaborations. You generally supply this information with your consent.
- Processing of personal information for marketing and subscription purposes. This is generally done with your consent.
- Processing of personal information during academic activities, such as teaching, advising, internships, externships, seminars, conferences, and continuing education. This is generally done with consent or under contract.
- Processing of personal information for honorariums, fellowships and scholarships. This is generally required to process a transaction with you;
- Processing of personal information of visitors, including temporary affiliates, volunteers, and short-term or impromptu visitors. This is generally done with your consent or under contract.

In certain instances, SVM may be required to obtain your consent to collect and process your Personal Data for a specific purpose. This depends on the specific category of data collected and the intended use of the data. In these instances, the SVM will inform you of the specific category of Personal Data that will be collected and the intended purpose of the collection, and the SVM will request that you affirmatively indicate that you consent to the intended collection of your Personal Data for that purpose, prior to collecting the data.

In these instances, if you do not consent to the collection and intended processing purpose, SVM will refrain from collecting and processing your Personal Data.

4. Recipients of Your Personal Data

SVM may share your Personal Data with the following recipients:

- **Other UC locations or departments:** Other UC locations or departments in order to provide you with a UC Service or where it is in UC's legitimate interests.
- **Service Providers:** Vendors that need access to your Personal Data in order to provide SVM's Services. For example, faculty, staff, students, and others working in the Veterinary Medical Teaching Hospital may need to acquire scrubs from our current vendor, who tracks and maintains the inventory of deployed scrubs based upon personal data.

- **UC Partners and Collaborators:** When permitted by law, UC may share Personal Data with other academic and research institutions in order to support various research missions.
- **Public and Governmental Authorities:** Entities that regulate or have jurisdiction over UC such as regulatory authorities, law enforcement, public bodies, and judicial bodies.
- **Corporate Transactions:** A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of UC's business.

If your Personal Data is shared with a third party, UC will require that the third party use appropriate measures to protect the confidentiality and security of your Personal Data.

We may also need to share your Personal Data as required to respond to lawful requests and legal process; to protect our rights and property and those of our agents, customers and others, including to enforce our agreements and policies; and in an emergency, to protect UC and the safety of our students, faculty and staff or any third party.

5. Security

UC takes appropriate physical, administrative and technical measures to protect Personal Data that are consistent with applicable privacy and data security laws and regulations. For more information about how UC protects data, refer to our [System-wide Information Security Policies and Standards.](#)]

5. Retaining and Deleting Your Personal Data

UC will only retain your Personal Data for the duration necessary for the data collection purposes identified above, unless there is a legal requirement to maintain it for a longer period. Please refer to our [System-wide Record Retention Schedule.](#)

6. International Transfer of Your Personal Data

In order to fulfill the intended processing purposes described above, your Personal Data will be transferred outside of the European Economic Area (EEA), specifically to the United States, which does not protect Personal Data in the same way that it is protected in the EEA. Some of SVM's affiliate organizations, for example, the One Health Institute, may transfer your information to other countries. UC will undertake appropriate measures to ensure adequate protection of Personal Data, including utilizing appropriate physical, administrative, and technical safeguards to protect Personal Data, as well as executing standard contractual clauses approved by the European Commission or a supervisory authority under GDPR, or obtaining your consent, where appropriate.

7. Your Rights

As required by the General Data Protection Regulation and applicable EU Member State and EEA state law, if you are located in the European Economic Area, you have a right to:

- **Access your Personal Data**, as well as information relating to the recipients of your Personal Data, the purposes of processing your Personal Data, the duration for which the Personal Data will be stored, and the source of Personal Data that has not been provided by you;
- **Rectify or correct inaccurate or incomplete Personal Data** concerning you, taking into account the purposes of the processing, and the right to have incomplete Personal Data completed;
- **Move your Personal Data** to another controller or processor. UC will facilitate the lawful transfer of your data to the extent possible;
- Have your **Personal Data erased** in certain circumstances;
- **Restrict the processing of your Personal Data** in certain circumstances;
- **Object** to the processing of Personal Data in certain circumstances;
- **Withdraw your consent to the processing of your Personal Data**, should UC ask for your consent for the processing of your Personal Data. The withdrawal does not affect the lawfulness of processing based on your consent before its withdrawal.
- Know whether your Personal Data is being used for **automated decision-making, including profiling**. In those cases, UC will give you meaningful information about the logic involved, the significance and the envisaged consequences of such processing for your data, and the right to request human intervention; and
- **Lodge a complaint with a supervisory authority**.

UC may be obligated to retain your Personal Data as required by U.S. federal or state law.

If you wish to exercise your rights, you can contact the UC Privacy Official identified below.

You may choose not to visit or use UC Sites or participate in SVM Services. If you choose not to share your Personal Data with UC or UC-approved third parties for SVM Services you may not be able to receive event updates, enroll in specific programs, etc. You may choose to set your web browser to refuse cookies, or to alert you when cookies are being sent. If you choose to reject cookies, some parts of the Sites may not function properly.

8. Questions and Complaints; UC Privacy Official

If you have questions or complaints about our treatment of your Personal Data, or about our privacy practices more generally, please feel free to contact the UC Privacy Official:

Molly Theodossy
UC Davis

Director of Compliance and Policy Programs
1 Shields Ave, Davis, CA 95616

Effective Date: This statement is effective as of October 1, 2018.