

## **Eastern College Consortium (ECCO) Program Notice of Data Processing and Consent**

In order to participate in the Eastern College Consortium (“ECCO”) overseas program offered by Wellesley College, Vassar College and Wesleyan University (collectively, “we” or “ECCO Members”), we will need to collect, use, share, and otherwise process personal information about you (“personal data”). This document describes how ECCO Members will process your personal data in connection with your participation in this program.

### Processing of Personal Data

In order to participate in the ECCO study abroad program (“ECCO Program”), we will process the following types of personal data:

- Name and basic biographical information (e.g. date of birth)
- Contact information (e.g., email address, physical address, phone number)
- Any information you submit to us as part of your application to the ECCO Program
- Academic records while in the ECCO Program (e.g., courses taken, grades)
- Information related to visa requirements, copies of passports, and other documents to ensure compliance with immigration laws
- Financial information, as necessary to make payment on your tuition and other expenses
- Information about incidents that occur during your time in the ECCO Program, such as if you are the victim or perpetrator of harassment or if you have been involved in any misconduct or criminal behavior
- Data concerning health (e.g., if you suffer any serious illness or injury)

Some of this information we collect directly from you (such as your application information). Other information, such as your academic records while in the ECCO Program, is provided by the University of Bologna (“UniBo”). Unless we tell you that certain information is optional, this information is necessary in order for you to participate in the ECCO Program.

ECCO Members process this personal data for the following purposes:

- In order to consider your application to the ECCO Program
- To arrange for your participation in the ECCO Program if you are selected
- To arrange for entry into Italy
- To arrange for appropriate accommodations (e.g., dorm room)
- To provide information to your home educational institution that is necessary for educational purposes or to comply with legal obligations or institutional policies
- To generally administer the ECCO Program
- For compliance with legal obligations (e.g., residence permits), to respond to subpoenas, court orders, or other legal process, and to enforce our agreements
- To prevent or investigate fraud or other unlawful activity, and to protect the security of ECCO’s property, website, and other systems
- To meet the obligations of private organizations with oversight over ECCO’s, such as accreditation organizations
- To protect the health, safety, or rights of you, other students, faculty, staff, and visitors.

The lawful bases for the collection and processing of personal data by ECCO Members are the following:

- Processing is necessary for the purposes of the legitimate interests pursued by an ECCO Member or third parties in providing educational and related services
- Processing is necessary for the performance of a contract with you (arranging for your participation in the ECCO Program) or in order to take steps at your request prior to your entrance into the ECCO Program

- With respect to data concerning health, to protect your vital interests, for the provision of health care, and as necessary for reasons of public health
- Processing is necessary to comply with a legal obligation to which an ECCO Member is subject

ECCO Members will share only your necessary personal data in the following manner:

- Among the ECCO Members as necessary to jointly administer the ECCO Program
- With UniBo as applicable, to enable you to access education and related services while you are in the ECCO Program
- With your home educational institution to the extent necessary to coordinate your participation in the program, comply with the home institution's policies, as necessary for educational purposes, to comply with legal obligations, and to protect your vital interests, as applicable
- With the student accommodation authorities in Bologna to arrange for appropriate accommodations
- With vendors that we engage to provide services related to the ECCO Program (e.g., insurance agency, transportation companies)
- Governmental bodies as necessary for compliance with law (e.g., immigration and visa purposes), with law enforcement authorities when necessary, and other third parties to enforce our legal rights
- Private organizations with oversight over an ECCO Member, such as accreditation organizations.

#### Consent for Other Processing

In addition to the data processing activities described above, which are mandatory in order to participate in the ECCO Program, we would also like to process the following special categories of data for the purpose of providing appropriate accommodations, notably a homestay:

- Data concerning health (e.g., allergies, disabilities)
- Religious beliefs or practices
- Other sensitive information that you voluntarily provide (which we may take into consideration, but which we do not share with hosts)

We will share relevant information with the student accommodations authorities, UniBo, and your home institution as necessary to make appropriate living arrangements for you and arrange for other accommodations as necessary. We need your consent to process this personal data for this purpose. If you do not provide consent, ECCO Members may not be able to ensure that any special health or religious needs that you may have are accommodated during your time in the ECCO Program.

#### Transfer of Personal Data Outside the European Economic Area ("EEA")

Your personal data will be transferred to ECCO Members and your home educational institution in the United States as necessary to provide you with the educational and other services offered through the ECCO Program or, when applicable, with your explicit consent. The United States has not sought nor received a finding of "adequacy" from the EEA, which means that the data protection laws in the United States may not offer you the same protections as in the country in which you are residing when the personal data is collected. Your home educational institution may not be bound by the data protection laws in the EEA and has not committed to the ECCO Members to implement appropriate technical and organizational safeguards to protect the privacy and security of your personal data. You should view your home institution's data privacy statement.

ECCO Members may also transfer your personal data to third parties, including our vendors, as described in this notice that may be located outside of the EEA as permitted by applicable law.

Retention of Data

ECCO Members retain your personal data for as long as necessary to coordinate your participation in the ECCO Program and the transfer of necessary records (e.g., grades, transcripts) to your home educational institution. Thereafter, we retain certain personal data about your participation in the ECCO Program for our record-keeping and archiving purposes as necessary to comply with legal and contractual obligations.

Individual Rights

If you are located in the EEA, you may have the following legal rights under applicable law with respect to the personal data processed by ECCO Members:

- to access the personal data that ECCO Members have about you
- to request that ECCO Members rectify or erase your personal data
- to request that ECCO Members restrict the way they use your personal data
- to object to the way ECCO Members use your personal data
- to ask ECCO Members to transfer your personal data to someone else
- to lodge a complaint with a data protection authority in the EEA

An ECCO Member’s ability or obligation to comply with your requests may be limited by applicable law.

Contact Information

The controllers of the personal data described in this notice are:

Wellesley College  
 106 Central Street  
 Wellesley, MA 02481  
 Email: [privacy@wellesley.edu](mailto:privacy@wellesley.edu)

Vassar College  
 124 Raymond Avenue #13  
 Poughkeepsie, NY 12604  
 Email: [privacy@vassar.edu](mailto:privacy@vassar.edu)

Wesleyan University  
 45 Wyllys Ave.  
 Middletown, CT 06459  
 Email: [DPO@wesleyan.edu](mailto:DPO@wesleyan.edu)

If you have questions about the processing of your personal data, or would like to request to exercise one of your rights as a data subject, please contact us at the addresses provided above.

Acknowledgment and Consent

We would like you to acknowledge that you have received this notice. In addition, we are requesting your consent to process special categories of data for the purposes set forth in the section titled “Consent for Other Processing.” Please check the appropriate statements below:

I acknowledge that I have received and read this privacy notice. [Mandatory]

I consent to the processing of special categories of data for the purpose of providing appropriate living arrangements.

I consent to transferring to my home educational institution in the United States special categories of data if necessary for the purpose of coordinating appropriate living arrangements.

\_\_\_\_\_  
 Signature  
 Print Name:

\_\_\_\_\_  
 Date

You have the right to withdraw this consent at any time. The withdrawal of your consent will not affect the lawfulness of processing that occurred prior to the withdrawal. In order to withdraw your consent, please contact [privacy@wellesley.edu](mailto:privacy@wellesley.edu), [privacy@vassar.edu](mailto:privacy@vassar.edu) or [DPO@wesleyan.edu](mailto:DPO@wesleyan.edu). If you withdraw your consent to this processing activity, we will continue to process your personal data for other purposes consistent with this notice.