Clayton State University

European Union General Data Protection Regulation

Lawful Basis for Collecting Data

Form

**Introduction**

On May 25, 2018, some of Clayton State University’s activities became subject to more stringent regulations governing the use of personal data. The European Union General Data Protection Regulation, or “EU GDPR”, imposes new obligations on entities that control or process personal data about people while they are in the European Union (“EU”).

See a list of the current members:

EU countries: https://europa.eu/european-union/about-eu/countries\_en

**Personal data** is any information relating to an identified or identifiable person either directly or indirectly. Examples of how a person may be identified include but are not limited to: name, photo, email address, identification number such as LakerCard ID, physical address or other location data, IP address or another online identifier, etc.

**Clayton State University has prepared this EU GDPR Lawful Basis Questionnaire to document the business reasons for collecting or processing personal data about people while they are in the EU.**

You were identified as a data steward that collects personal data. We need for you to provide us with the reasons why you need to collect the data.

Should you have any questions about this form, please contact: [RebeccaGmeiner@clayton.edu](mailto:RebeccaGmeiner@clayton.edu) or [CorlisCummings@clayton.edu](mailto:CorlisCummings@clayton.edu).

**Stewardship**

**Business Domain:**

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*(options: Student, Financials, HR, Research, Services & Resources, Affiliated/Co-op Orgs, etc.)*

**Business Area:**

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*(examples: Undergraduate Admissions, Accounts Payable, Payroll, Parking)*

**Data Steward Name:**

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**Data Steward Email Address:**

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**Data Trustee Name (If Applicable):**

Will be determined later.

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**Data Trustee Email Address:**

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**If you are filling out this form on behalf of a Data Steward or Data Trustee, please provide your name and email address:**

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**Questions**

1. How do you receive personal data about people while they are located in the EU?

oFrom individuals themselves

oFrom third-party

oFrom both individual and third-party

1. (If 1 is “From third-party” or “From both individual and third-party”) Please list below the third-parties from whom you receive personal data.

*Please separate third-party names with semicolons.*

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1. Is your office deleting the personal data it collects or processes at the end of the appropriate USG Records Retention time period?

*Find USG Records Retention time periods here:* [*http://www.usg.edu/records\_management/schedules/*](http://www.usg.edu/records_management/schedules/)

oYes oNo oIf no, please go to <https://www.usg.edu/records_management/schedules/> and review the records retention rules for your data.

1. For what business purpose(s) does your office collect or process personal data about people while they are located in the EU?

*Please separate business purposes with semicolons.*

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1. Can you meet the business purpose(s) listed in your response to the prior question without the use of all such personal data collected?

oYes oNo

1. Can the data subject opt out of the collection and processing of the personal data while still meeting the business purpose(s) for collecting the personal data?

oYes oNo

1. Are you using the personal data for any reason(s) other than the reason(s) for which it was originally collected?

oYes oNo

1. (If 7 is Yes) Please describe the type of personal data collected, the reason it was originally collected, and the type of continued use/processing that is different than the reason such personal data was initially collected.

*Please separate types of personal data with semicolons.*

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1. Have you taken steps to ensure that the personal data collected/processed is the minimum necessary and that all information so collected and processed is secure via encryption or other privacy enhancing technologies?

oYes oNo oI need someone to contact me about privacy enhancing technologies.

(If 9 is Yes) Please describe the data security measures utilized.

*Please separate data security measures with semicolons.*

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1. Does your office share with other Clayton State University units any of the personal data you collect or process from people while they are located in the EU?

oYes oNo

1. Does your office share with third-parties any of the personal data you collect or process from people while they are located in the EU? This could be because of a contract, accreditation, etc.

oYes oNo

1. (If 12 is Yes) Please name the third-parties with whom you share personal data.

*Please separate third-party names with semicolons.*

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1. Do any of your websites collect personal data from visitors - either automatically (cookies, IP

addresses, Google Analytics) or through forms filled out by visitors?

oYes oNo oDo not have a website

1. Do you link to the Clayton State University Privacy Notice on your website homepage?

*See Clayton State University Legal & Privacy Information Notice:*

*http://www.clayton.edu/privacy*

oYes oNo oDo not have a website

1. Does your office collect, store, or use any of the following types of **sensitive personal data**

about people while they are located in the EU?

*Check as many as apply, or check "None"*

▢ Racial or ethnic origin ▢ Political opinions

▢ Religious or philosophical beliefs ▢ Trade union memberships

▢ Genetic or biometric data ▢ Criminal convictions or offenses

▢ Data concerning sex life/sexual orientation ▢ Health data

▢ None - Do not collect sensitive personal data

1. (If 16 is not None) For what business purpose(s) does your office collect or process **sensitive personal data** about people while they are located in the EU?

*Please separate business purposes with semicolons.*

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1. (If 16 is not None) Can you meet the business purpose(s) listed in your response to the prior question without the use of all such **sensitive personal data** collected?

oYes oNo

1. (If 16 is not None) Can the data subject opt out of the collection and processing of the **sensitive personal data** while still meeting the business purpose(s) for collecting the **sensitive personal data**?

oYes oNo

1. (If 16 is not None) Do you get affirmative written consent from the person before you collect this type of **sensitive personal data**? If no, please describe how you obtain or infer consent. Ex. They apply for service and provide personal information.

oYes oNo

***Please add additional pages if necessary. Identify the question that the page applies to at the top of the document.***