

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 or CorlisCummings@clayton.edu.

Stewardship

Business Domain:

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

Business Area:

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

Data Steward Name:

Data Steward Email Address:

Data Trustee Name (If Applicable):

Will be determined later.

Data Trustee Email Address:

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

Questions

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

- ☐ From individuals themselves
- ☐ From third-party
- ☐ From both individual and third-party

2. (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.

3. 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/

- ☐ Yes
- ☐ No
- ☐ If no, please go to https://www.usg.edu/records_management/schedules/ and review the records retention rules for your data.

4. 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.

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

☐ Yes ☐ No

6. 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?

☐ Yes ☐ No

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

☐ Yes ☐ No

8. (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.

9.

Please separate types of personal data with semicolons.

10. 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?

☐ Yes - ☐ No - ☐ I 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.

11. 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?

☐ Yes ☐ No

12. 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.

☐ Yes ☐ No

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

Please separate third-party names with semicolons.

14. Do any of your websites collect personal data from visitors - either automatically (cookies, IP addresses, Google Analytics) or through forms filled out by visitors?

- ☐ Yes ☐ No ☐ Do not have a website

15. 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>

- ☐ Yes ☐ No ☐ Do not have a website

16. 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"

- | | |
|--|---|
| <input type="checkbox"/> Racial or ethnic origin | <input type="checkbox"/> Political opinions |
| <input type="checkbox"/> Religious or philosophical beliefs | <input type="checkbox"/> Trade union memberships |
| <input type="checkbox"/> Genetic or biometric data | <input type="checkbox"/> Criminal convictions or offenses |
| <input type="checkbox"/> Data concerning sex life/sexual orientation | <input type="checkbox"/> Health data |
| <input type="checkbox"/> None - Do not collect sensitive personal data | |

17. (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.

18. (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?

- ☐ Yes ☐ No

19. (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**?

- ☐ Yes ☐ No

20. (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.

- ☐ Yes ☐ No

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