# CUIMC Student Health on Haven – Vaccination Status Privacy Notice

This Privacy Notice describes how Columbia University ("**Columbia,** "**we**", or "**us**") collects, uses, stores, transfers, and otherwise processes personal information about you in connection with your COVID-19 vaccination status. This Privacy Notice also sets out your rights in relation to this personal information.

## PERSONAL INFORMATION WE COLLECT AND USE

When you provide vaccine information, upload supporting documentation, or submit an optional medical or religious exemption request form, Columbia collects and uses personal information about you. Personal information is information about you through which you can be identified (including where you can be identified by combining the information with other information).

Note that we may be required by law to collect certain personal information about you, or as a consequence of our contractual relationship with you. Failure to provide this personal information may prevent or delay the fulfilment of these obligations. We will inform you at the time your personal information is collected whether certain data is compulsory and the consequences of the failure to provide such personal information.

### Personal information we collect directly from you

We collect some personal information directly from you. This includes the following:

a) Personal details (e.g., first and last name, date of birth, gender)
b) Contact details (e.g., Columbia email address)
c) Identification numbers (e.g., UNI)
d) Program and arrival details (e.g., the Columbia school / program you will be attending, your arrival date in New York)
e) Health information relating to your COVID-19 vaccination status (e.g., whether you have received one or more doses of a vaccine, which vaccine you received, dates vaccine received)
f) Documentation you submit as proof of vaccination (e.g., scanned copies of your CDC vaccination record card, WHO booklet, letter from a physician verifying your vaccination; such documentation may contain additional personal information about you, such as date(s) and location of vaccination, patient number, or other personal information about you)
g) Religious or Medical Exemption information (e.g., if you choose to submit a request form for an exemption and provide information about your health or medical condition(s) or your religious beliefs, including supporting documentation from a physician or religious leader)

### Sensitive information we collect and use

Some of the categories of personal information that we collect may be considered particularly sensitive. As described above, we may process the following sensitive information:

a) Health and medical information, including information relating to your COVID-19 vaccination status and, if you choose to submit a request for a medical vaccine exemption, information about your health or medical status
b) Information about your religious beliefs, if you choose to submit a request for a religious vaccine exemption

## HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT

Columbia uses the personal information we collect in this context for the following purposes:

**To manage health and safety considerations**. This includes processing information to protect the health and safety of our students, faculty and staff, alumnae, other Columbia affiliates, and third parties; planning for on-campus education in light of health and safety considerations; determining campus public health protocols including isolation, quarantine, testing, and contact tracing; implementing Columbia's COVID-19 vaccination requirements; making decisions about medical or religious exemptions to the vaccination requirements; coordinating and registering students for dispensation of COVID-19 vaccines, if necessary.

**To communicate with you.** This may include communicating with you about COVID-19 safety, testing, and vaccination considerations or responding to your questions or requests.

**To comply with our legal obligations.** This may include processing personal information for purposes of compliance with applicable legal or regulatory obligations.

We may also anonymize your personal information in such a way that you may not reasonably be re-identified, and we may use this anonymized information for any other purpose.

**Legal basis for processing**

We rely on the following legal bases to process your personal information:

To comply with our contractual obligations to you.

To comply with legal obligations to which we are subject**.**

Where the processing is necessary to serve our legitimate interests, including our interests in the following:

Protecting the health and safety of our students, faculty and staff, alumnae, other Columbia affiliates, and third parties;

Communicating with you;

Providing academic services;

Program planning and development; and

Keeping our records accurate and up-to-date.

To the extent we use sensitive information about your health or religious beliefs, such processing may be conducted: as necessary for the purpose of meeting our health and safety obligations to our employees, students and others; for reasons of substantial public interest; or as necessary for reasons of public interest in the area of public health.

**WHO HAS ACCESS TO YOUR PERSONAL INFORMATION**

We may share your personal information with the following parties:

Service providers. We may share your personal information with service providers who perform services or business operations for us for the purposes set out above. For example, we may engage service providers to provide cloud hosting services and support email and messaging services, among other purposes.

Where required by law. We may share your personal information with law enforcement agencies, courts, other government authorities or other third parties where we believe it is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party. For example, we may share information where required by law for contact tracing purposes.

Please note that the recipients referred to above may be located outside the jurisdiction in which you are located. Please see the section on "International transfer of your data" below for more information.

**HOW YOUR PERSONAL INFORMATION IS PROTECTED AND STORED**

We implement physical, technical, and organizational security measures designed to safeguard the personal information we process. These measures are aimed at providing on-going integrity and confidentiality for your personal information.

We retain your personal information for as long as we have a relationship with you. When deciding how long to keep your personal information after our relationship with you has ended, we take into account health and safety considerations and our legal obligations. We may also retain records to investigate or defend against potential legal claims.

**INTERNATIONAL TRANSFER OF YOUR DATA**

Your personal information may be transferred to, stored, and processed in a country (such as the United States) that is not regarded as ensuring an adequate level of protection for personal information under the laws of your home country.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your personal information is adequately protected. For more information on the appropriate safeguards in place, please contact us as described below.

**HOW TO EXERCISE YOUR RIGHTS**

Where applicable under local law, you may have the following rights with respect to your personal information:

- To access the information that we have about you
- To request that we rectify or erase your information
- To request that we restrict the way we use your information
- To object to the way we use your information, if we are processing your personal information on the basis of our legitimate interests
- To ask us to transfer your information to someone else
- To lodge a complaint with the appropriate data protection authority

If you wish to exercise these rights, or to notify us of a change in your details, or if you have any questions on the content of this Privacy Notice, please contact as described below.

**HOW TO CONTACT US**

If you have questions or concerns regarding the way in which your personal information has been used, please contact studenthealthservice@cumc.columbia.edu

We are committed to working with you to obtain a fair resolution of any complaint or concern about your privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to make a complaint to the appropriate data protection authority.

**CHANGES TO THE PRIVACY NOTICE**

We may modify or update this privacy notice from time to time. If we make any revisions that materially change the ways in which we process your personal information, we will notify you of these changes before applying them to that personal information.

**Effective: July 13, 2021**