

Carnegie Mellon University

COVID-19 Vaccination Data Collection Privacy Notice

Effective Date: May 24, 2021

Carnegie Mellon University (“CMU,” “we,” “us,” or “our”) is committed to privacy and data protection. This Privacy Notice applies to all personal data CMU collects from you relating to COVID-19 vaccination information, including information collected via the COVID-19 Vaccination Data Collection (the “Vaccination Data Collection”).

CMU is the controller of the personal data subject to this Privacy Notice. Any questions or concerns regarding CMU’s privacy and data protection practices can be directed to our Data Protection Officer, Melanie Lucht, Associate Vice President and Chief Risk Officer at GDPR-info@andrew.cmu.edu.

Personal Data We Collect

CMU collects data to plan for CMU’s post-pandemic reopening of campus, communicate with you, and enable you to register for a COVID-19 vaccination appointment. You provide some of this information directly, such as when you register for the Vaccination Data Collection. Some of the information is collected through your interactions with the Vaccination Data Collection. We collect such data using technologies like cookies and other tracking technologies, error reports, and usage data collected when you interact with the Vaccination Data Collection using your device.

The data we collect may include the following:

Name and contact information. We may collect your first and last name, email address, postal address, phone number, and other similar contact data. We may use this information to contact you or provide you with information on CMU or the Vaccination Data Collection.

Credentials. We process passwords and related security information used for authentication and account access and information security purposes.

Vaccination registration data. When you register to receive a COVID-19 vaccine from us or our partners, we will ask you to provide personal data to process your application or registration such as your: name, age, address, telephone number, email address, job title, health conditions, and emergency contact information. If you are a CMU employee, we may ask you to identify your department or office, and supervisor.

Sensitive personal data. Under certain circumstances, we may ask you to provide personal data concerning health (“Sensitive Personal Information”). Providing Sensitive Personal Information is voluntary, and we will only collect and process Sensitive Personal Information with your consent.

Usage data. We collect personalized information about your use of the Vaccination Data Collection, to better understand uses thereof and identify potential improvements, as well as to send you communications.

Examples include:

- Information on the web pages you visit on the Vaccination Data Collection.

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- Information regarding the performance of the Vaccination Data Collection and any problems you may experience while using them. This information enables us to diagnose problems and offer support in resolution.
- Data about your device and the network you use to connect to the Vaccination Data Collection, including IP address, device identifiers, and regional and language settings.

Web requests. We collect information regarding every web request sent to our servers. This information is used to provide support, as well as to assess usage and performance of the Vaccination Data Collection. The data collected for each request can include such things as timestamps, any exception messages, user agent, IP address, and request time and duration.

Location data. We collect your IP address and infer location such as city or postcode therefrom, when necessary in order to provide you with the Vaccination Data Collection or to send you communications.

Content. We may collect the content of messages you send to us, such as feedback or questions you ask our technical support representatives, when necessary to provide you with access to and use of the Vaccination Data Collection. We will collect and utilize any data files you send to us for troubleshooting and improving the Vaccination Data Collection.

How We Use Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data for the following lawful purposes:

- Where we need such information to perform a contract we are about to enter into or have entered into with you (“performance of a contract”).
- Where we receive your consent (“consent”).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (“legitimate business interest”).
- Where we need to comply with a legal or regulatory obligation (“legal obligation”).

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where it is required or permitted by law.

CMU uses information that we collect from you for the purposes of:

- planning for CMU’s post-pandemic campus reopening (legitimate business interest);
- implementing CMU’s COVID-19 vaccination requirements and/or exemptions to such requirement (legitimate business interest)
- communicating with you, including communications relating to CMU’s post-pandemic campus reopening (legitimate business interest);
- registering you for COVID-19 vaccine dispensation (legitimate business interest);
- providing the Vaccination Data Collection (performance of a contract);
- providing ongoing support (performance of a contract);
- helping us run our organization, for example, to improve the Vaccination Data Collection or our security, and to train staff (legitimate business interest);
- complying with our legal obligations (legal obligation); and

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- other administrative purposes (legitimate business interest).

How We Share Personal Data

It is the practice of CMU to protect personal information. Access to the personal information subject to this Privacy Notice is restricted to only those employees or agents, contractors or subcontractors of CMU who have valid reasons to access this information to perform any service you have requested or authorized, or for any other purpose described in this Privacy Notice. The information you provide will not be sold or rented to third parties.

We may provide your personal data to:

- outsourced service providers who perform functions on our behalf, located inside or outside of the European Union (“EU”) territory (in such case, we will use the appropriate legal framework to operate data transfers). For example, your personal information may be stored on cloud hosting services such as Amazon Web Services.
- our authorized agents and representatives, located inside or outside of your country of residence (in such case, we will use appropriate legal framework to operate data transfers), who provide services on our behalf, such as training service providers;
- anyone expressly authorized by you to receive your personal data; or
- anyone to whom we are required by law to disclose personal data, upon valid and enforceable request thereof.

We will access, disclose and preserve personal data, when we have a good faith belief that doing so is necessary to:

- comply with applicable law or respond to valid legal processes, including from law enforcement or other government agencies, upon valid and enforceable request thereof; or
- operate and maintain the security of the Vaccination Data Collection, including to prevent or stop an attack on our computer systems or networks.

Handling of Personal Data

Security of Personal Data

CMU is committed to protecting the security of your personal data. Depending on the circumstances, we may hold your information in hard copy and/or electronic form. For each medium, we use technologies and procedures to protect personal data. We review our strategies and update as necessary to meet our business needs, changes in technology, and regulatory requirements.

These measures include, but are not limited to, technical and organizational security policies and procedures, security controls and employee training.

We may suspend your use of all or part of the Vaccination Data Collection without notice if we suspect or detect any breach of security, abuse, or illegal or questionable activity. If you believe that information you provided to us is no longer secure, please notify us immediately using the contact information provided below.

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If we become aware of a breach that affects the security of your personal data, we will provide you with notice as required by applicable law. To the extent permitted by applicable law, CMU will provide any such notice that CMU must provide to you at your Vaccination Data Collection account's email address. By using the Vaccination Data Collection, you agree to accept notice electronically.

Storage and Transfer of Personal Data

Personal data collected by CMU may be stored and processed in your region, in the United States or in any other country where CMU, its affiliates or contractors maintain facilities, including outside the EU. We take steps to ensure that the data we collect under this Privacy Notice is processed pursuant to the terms thereof and the requirements of applicable law wherever the data is located.

CMU also collaborates with third parties such as cloud-hosting services and suppliers located around the world to serve the needs of our business, workforce, and users. In some cases, we may need to disclose or transfer your personal data within CMU or to third parties in areas outside of your home country. When we do so, we take steps to ensure that personal data is processed, secured, and transferred according to applicable law.

If you would like to know more about our data transfer practices, please contact our Data Protection Officer at GDPR-info@andrew.cmu.edu.

Retention of Personal Data

CMU retains personal data in a form which permits identification of data subjects for as long as necessary to provide the Vaccination Data Collection and fulfill the transactions you have requested, or for other business purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. We are required by law to keep some types of information for certain periods of time (e.g., statute of limitations).

Your Rights Regarding Your Personal Data

CMU respects your right to access and control your personal data. You have choices about the data we collect. When you are asked to provide personal data that is not necessary for the purposes of providing you with a COVID-19 vaccine dispensation appointment or use of the Vaccination Data Collection, you may decline. However, if you choose not to provide data that is necessary for those purposes, you may not be able to register to receive the COVID-19 vaccine or use the Vaccination Data Collection.

We aim to keep all personal data that we hold accurate, complete and up-to-date. While we will use our best efforts to do so, we encourage you to tell us if you change your contact details. If you believe that the information we hold about you is incorrect, incomplete or out-of-date, please contact GDPR-info@andrew.cmu.edu.

Access to personal data. In some jurisdictions, you have the right to request access to your personal data. In these cases, we will comply, subject to any relevant legal requirements and exemptions, including identity verification procedures. Before providing data to you, we will ask for proof of identity and sufficient information about your interaction with us so that we can locate any relevant data. We may also charge you a fee for providing you with a copy of your data (except where this is not permissible under local law).

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Correction and deletion. In some jurisdictions, you have the right to correct or amend your personal data if it is inaccurate or requires updating. You may also have the right to request deletion of your personal data. Please note that such a request could be refused because your personal data is required to provide you with services you requested or that it is required by the applicable law.

Portability. If you reside within the EU, you have the right to ask for a copy of your personal data and/or ask for it to be ported to another provider of your choice. Please note that such a request could be limited to only personal data you provided us with or that we hold at that given time and subject to any relevant legal requirements and exemptions, including identity verification procedures.

Cookies & Other Technologies

CMU uses cookies (small, often encrypted, text files that are stored on your computer or mobile device) and similar technologies (“Cookies”) to provide the Vaccination Data Collection and help collect data.

How We Use Cookies

We use Cookies to track how you use the Vaccination Data Collection by providing usage statistics. Cookies are also used to deliver CMU information (including updates) based upon your browsing history and previous visits to the Vaccination Data Collection. Information supplied to us using Cookies helps us to provide a better online experience to our visitors and users and send communications to them, as the case may be. Information supplied to us upon launching of the Vaccination Data Collection will enable CMU to improve the functionality of the Vaccination Data Collection.

While this information on its own may not constitute your “personal data”, we may combine the information we collect via Cookies with personal data that we have collected from you to learn more about how you use the Vaccination Data Collection to improve it.

Types of Cookies

We use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your device until you delete them). To make it easier for you to understand why we need them, the Cookies we use on the Vaccination Data Collection can be grouped into the following categories:

- **Strictly Necessary:** These Cookies are necessary for the Vaccination Data Collection to work properly. They include any essential authentication and authorization Cookies for the Vaccination Data Collection.
- **Functionality:** These Cookies enable technical performance and allow us to “remember” the choices you make while browsing the Vaccination Data Collection, including any preferences you set. They also include sign-in and authentication Cookies and IDs that enable you to return without additional sign-in.
- **Performance/Analytical:** These Cookies allow us to collect certain information about how you navigate the Vaccination Data Collection. They help us understand which areas you use and what we can do to improve them.
- **Targeting:** These Cookies are used to deliver relevant information related to the Vaccination Data Collection to an identified machine or other device (not a named or otherwise identifiable person) which has previously been used to visit the Vaccination Data Collection. Some of these

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types of Cookies on the Vaccination Data Collection are operated by third parties with our permission and are used to identify advertising sources that are effectively driving users to the Vaccination Data Collection.

Cookies Set by Third Parties

To enhance our content and to deliver a better online experience for you, we sometimes embed images and videos from other websites on the Vaccination Data Collection. We currently use, and may in future use content from services such as Facebook, LinkedIn and Twitter. You may be presented with Cookies from these third-party websites. Please note that we do not control these Cookies. The privacy practices of these third parties will be governed by the parties' own privacy statements or policies. We are not responsible for the security or privacy of any information collected by these third parties, using Cookies or other means. You should consult and review the relevant third-party privacy statement or policy for information on how these Cookies are used and how you can control them.

We also use Google, a third-party analytics provider, to collect information about Vaccination Data Collection usage and the users of the Vaccination Data Collection, including demographic and interest-level information. Google uses Cookies in order to collect demographic and interest-level information and usage information from users that visit the Vaccination Data Collection, including information about the pages where users enter and exit the Vaccination Data Collection and what pages users view on the Vaccination Data Collection, time spent, browser, operating system, and IP address. Cookies allow Google to recognize a user when a user visits the Vaccination Data Collection and when the user visits other websites. Google uses the information it collects from the Vaccination Data Collection and other websites to share with us and other website operators' information about users including age range, gender, geographic regions, general interests, and details about devices used to visit websites and purchase items. We do not link information we receive from Google with any of your personally identifiable information. For more information regarding Google's use of Cookies, and collection and use of information, see the Google Privacy Notice (available at <https://policies.google.com/privacy?hl=en>). If you would like to opt out of Google Analytics tracking, please visit the Google Analytics Opt-out Browser Add-on (available at <https://tools.google.com/dlpage/gaoptout>).

How to Control and Delete Cookies

Cookies can be controlled, blocked or restricted through your web browser settings. Information on how to do this can be found within the Help section of your browser. All Cookies are browser specific. Therefore, if you use multiple browsers or devices to access websites, you will need to manage your cookie preferences across these environments.

If you are using a mobile device to access the Vaccination Data Collection, you will need to refer to your instruction manual or other help/settings resource to find out how you can control Cookies on your device.

Please note: If you restrict, disable or block any or all Cookies from your web browser or mobile or other device, the Vaccination Data Collection may not operate properly, and you may not have access to the Vaccination Data Collection. CMU shall not be liable for any impossibility to use the Vaccination Data Collection or degraded functioning thereof, where such are caused by your settings and choices regarding Cookies.

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To learn more about Cookies and web beacons, visit www.allaboutCookies.org.

Do Not Track

Some web browsers (including Safari, Internet Explorer, Firefox and Chrome) incorporate a “Do Not Track” (“DNT”) or similar feature that signals to websites that a user does not want to have his or her online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain information about the browser’s user. Not all browsers offer a DNT option and DNT signals are not yet uniform. For this reason, many website operators, including CMU, do not respond to DNT signals.

Children's Privacy

The Vaccination Data Collection is not intended for use of children under the age of 13, and we do not knowingly collect personal information from children under the age of 13 via the Vaccination Data Collection. If you are under the age of 13, please do not submit any personal information to the Vaccination Data Collection. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce this Privacy Notice.

California Minors: If you are a California resident who is under age 18 and you are unable to remove publicly-available content that you have submitted to us, you may request removal by contacting us at: GDPR-info@andrew.cmu.edu. When requesting removal, you must be specific about the information you want removed and provide us with specific information, such as the URL for each page where the information was entered, so that we can find it. We are not required to remove any content or information that: (1) federal or state law requires us or a third party to maintain; (2) was not posted by you; (3) is anonymized so that you cannot be identified; (4) you don’t follow our instructions for removing or requesting removal; or (5) you received compensation or other consideration for providing the content or information. Removal of your content or information from the Vaccination Data Collection does not ensure complete or comprehensive removal of that content or information from our systems or the systems of our service providers. We are not required to delete the content or information posted by you; our obligations under California law are satisfied so long as we anonymize the content or information or render it invisible to other users and the public.

The General Data Protection Regulation (“GDPR”)

If you reside within the EU you may be entitled to other rights under the GDPR. These rights are summarized below. We may require you to verify your identity before we respond to your requests to exercise your rights. If you are entitled to these rights, you may exercise these rights with respect to your personal data that we collect and store:

- the right to withdraw your consent to data processing at any time (please note that this might prevent you from using certain aspects of the Vaccination Data Collection);
- the right of access your personal data;
- the right to request a copy of your personal data;
- the right to correct any inaccuracies in your personal data;
- the right to erase your personal data;

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- the right to data portability, meaning to request a transfer of your personal data from us to any other person or entity as chosen by you;
- the right to request restriction of the processing of your personal data; and
- the right to object to processing of your personal data.

You may exercise these rights free of charge. These rights will be exercisable subject to limitations as provided for by the GDPR. Any requests to exercise the above-listed rights may be made to: GDPR-info@andrew.cmu.edu.

If you reside within the EU, you have the right to lodge a complaint with a Data Protection Authority about how we process your personal data at the following website: https://edpb.europa.eu/about-edpb/board/members_en.

Processing EU Personal Data

In the event that your personal data is subject to the GDPR, we will only use your personal data for the original purpose for which we collected it, unless we reasonably consider that we need to use it for another purpose and that purpose is compatible with the original purpose. If we need to use your EU personal data for an unrelated purpose, we will notify you and we will explain the legal basis, which allows us to do so. We require third parties to only use your EU personal data for the specific purpose for which it was given to us and to protect the privacy of your personal data. If your personal data is no longer necessary for the legal or business purposes for which it is processed, we will generally destroy or anonymize that data.

International Transfers of Personal Data

Whenever we transfer your personal data out of the EU, we ensure a similar degree of protection is afforded to it by using specific contracts approved by the European Commission (the “Standard Contractual Clauses”) which give personal data the same protection it has in the EU.

For additional information on the mechanisms used to protect your personal data, please contact our Data Protection Officer at GDPR-info@andrew.cmu.edu.

Changes To This Privacy Notice

We may update this Privacy Notice based upon evolving laws, regulations and industry standards, or as we may make changes to our business including the Vaccination Data Collection. We will post changes to our Privacy Notice on this page and encourage you to review our Privacy Notice when you use the Vaccination Data Collection to stay informed. If we make changes that materially alter your privacy rights, CMU will provide additional notice, such as via email or through the Vaccination Data Collection. If you disagree with the changes to this Privacy Notice, you should discontinue your use of the Vaccination Data Collection. You may also request access and control of your personal data as outlined in the Your Rights Regarding Personal Data section of this Privacy Notice.

Questions or Complaints Handling

We understand that you may have questions or concerns about this Privacy Notice or our privacy practices or may wish to file a complaint. In such case, please contact us in one of the following ways:

Carnegie Mellon University

Email: GDPR-info@andrew.cmu.edu

Mail:

Carnegie Mellon University
Attention: Data Protection Officer
5000 Forbes Avenue
Pittsburgh, PA 15213

If you are not satisfied with our answer or how CMU manages your personal data, you may also have the right to make a complaint to a data protection regulator. If you reside within the EU, a list of National Data Protection Authorities can be found here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.