

Global Privacy Notice

CONTACT

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Privacy Statement

WPI is committed to respecting the privacy of information and data that may be used to identify you (your "personal information"). This Global Privacy Notice describes our practices regarding the most common ways we collect, use, or otherwise process your personal information.

This Global Privacy Notice does not apply to non-personal information that does not identify you as a specific person (e.g., your deidentified data). This Global Privacy Notice also does not apply to publicly available information (e.g., information from commercially available sources) that we do not possess or control.

Information WPI Collects and How We Use Your Personal Information

1. Prospective Students and Applicants

WPI collects and uses personal information about applicants and other prospective students, including students interested in our summer programs (referred to collectively as "applicants"). If you are or have been an applicant, we may collect and use the following types of personal information about you, including but not limited to:

- Your contact information and biographical data (e.g., name, address, phone number, email address, date of birth, social security number, preferred pronouns, sex, gender, race, ethnicity, nationality, citizenship, sexual orientation, religious affiliation, family information)
- Information and supporting documentation that you provide in your application, including through third parties such as The Common Application

- Related application materials (e.g., transcripts, recommendations, references, test scores, essays)
- Information that you have permitted a third party such as The College Board or ACT to release to WPI (e.g., test scores, demographic information, academic information, financial information)
- Contact information that we receive from you, from other institutions, or from vendors
- Financial information, including financial information about your family members (e.g., information collected in connection with your applications for financial aid, loans, or scholarships)
- Survey responses, if you choose to respond to a survey sent by us or on our behalf

WPI will use your personal information primarily for our legitimate interests in evaluating your application and for related activities, such as evaluating requests for financial aid, communicating with you about your application or potential application, and other administrative functions related to our admissions, enrollment, and financial aid processes.

We may also use or disclose your personal information for the following purposes, based on our legitimate interests:

- To consider requests for resources (e.g., accommodations, advising)
- For research and statistical purposes
- To provide you with information about WPI and events that you might be interested in attending
- To send you surveys for research purposes
- For compliance with legal obligations, to respond to subpoenas, court orders, or other legal processes, and to enforce our agreements
- To prevent or investigate fraud or other unlawful activity, and to protect the security of WPI's property, website, and other systems
- To meet the obligations of private organizations with oversight over WPI, such as accreditation organizations
- To protect the health, safety, or rights of you, other students, faculty, staff, and visitors

We may share your information with the following individuals and entities, as applicable and to the extent permitted by law:

- Individuals who assist us in the application process, such as faculty, staff, and outside consultants
- Other departments within WPI, in addition to Admissions and the Office of Financial Aid, including the Department of Physical Education & Athletics, Institutional Research, and Advancement
- Your financial institutions and funders (e.g., as necessary for obtaining loans, scholarships, or other funding)
- Other educational institutions (e.g., in order to send you information about jointly hosted opportunities and events)

- Vendors who provide services to WPI
- Governmental bodies as necessary for compliance with law, with law enforcement authorities when necessary, and other third parties to enforce our legal rights
- Private organizations with oversight over WPI, such as accreditation organizations

With respect to personal information subject to the GDPR, we rely on the following lawful bases for processing:

- Our legitimate interests, such as conducting our admissions activities
- To provide you with services or perform on contractual obligations, such as processing your application for admission
- For compliance with our legal obligations
- With your consent, when applicable

2. Students, Faculty, and Staff

When you are a Massachusetts Academy student, an undergraduate or graduate student at WPI, or a member or prospective member of the faculty or staff, we maintain records containing your personal information. We may collect and use the following types of personal information about you, as applicable:

- Your contact information and biographical data (e.g., name, address, phone number, email address, date of birth, social security number, preferred pronouns, sex, gender, race, ethnicity, nationality, citizenship, sexual orientation, religious affiliation, family information)
- Application materials and supporting documents (e.g., applications for admission, employment, or WPI programs)
- Copies of identification documents and other official documents (e.g., driver's license, I-9 form, I-94 form, I-20 form, passport/visa information, residency information, vehicle registration)
- Employment and/or educational records (e.g., job history, job reviews, transcript information)
- Academic work product and related information (e.g., research, projects, and course-related content)
- Internal research and survey data (e.g., course and instructor evaluations, campus surveys)
- Records about your other activities (e.g., for students, involvement in clubs, disciplinary actions and similar incidents)
- Financial information (e.g., banking information, payroll information, information related to tuition payments)
- Health information collected and maintained as appropriate and necessary and subject to relevant laws
- For students, Massachusetts Academy, WPI Student Health Services, the Student Development & Counseling Center, and the Department of Physical Education, Recreation & Athletics collect medical

information for the purposes of providing treatment and continuity of care and determining enrollment and participation eligibility.

- Other offices, such as the Division of Student Affairs, the Office of Accessibility Services, the Division of Talent & Inclusion, the Office of Environmental Health & Safety, the WPI Police Department, the Global Experience Office, the Office of Institutional Research, in addition to the offices named above, may request or maintain medical or health information for business purposes (not for treatment purposes) and determining enrollment and participation eligibility
- Information about technology usage (e.g., IP addresses, software downloads, network and services use for business purposes)
- Motor vehicle records (e.g., for driving on WPI business) and travel information (e.g., for traveling on WPI business)

We use this information for the following purposes as applicable:

- For general communications about WPI
- To provide educational, employment and/or related services (e.g., maintaining relevant records of your studies or employment, providing you with access to facilities and support services, such as counseling and IT services)
- To administer the financial aspects of the relationship (e.g., payroll, collecting tuition, coordinating with lenders or other funders)
- To enable your participation at events and in other opportunities (e.g., graduation, internships, research, projects, and project center and study abroad programs)
- To protect the educational integrity of the school (e.g., disciplinary actions)
- To accommodate special needs (e.g., disability , food allergies)
- For research and statistical purposes related to our educational and/or other services
- To provide directory information in student, faculty, and/or staff directories
- For the general operations of WPI and related administrative functions
- For compliance with legal obligations, 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 WPI's property, website, and other systems
- To meet the obligations of private organizations with oversight over WPI, such as accreditation organizations
- To protect the health, safety, or rights of you, other students, faculty, staff, and visitors

We may share your personal information with the following:

- Faculty and staff at WPI in order to fulfill their responsibilities
- Your lenders, funders, and/or other sponsors
- Providers of any external program, such as internships, student projects research, project center and study abroad programs, and other collaborations
- Your host institution and host family (in connection with study abroad or faculty or student exchange programs)
- Student clubs and related organizations
- Other departments within WPI
- Individuals or entities inquiring about your attendance, employment history, or disciplinary history
- Other individuals or entities with a legitimate interest in your personal information
- Vendors who provide services to WPI
- Governmental bodies as necessary for compliance with law, with law enforcement authorities when necessary, and other third parties to enforce our legal rights
- Private organizations with oversight over WPI, such as accreditation organizations

With respect to personal information subject to the GDPR, we rely on the following lawful bases for processing:

- Our legitimate interests, such as fulfilling our educational mission
- To provide you with services or perform on contractual obligations, such as providing you with educational services or managing your employment relationship
- For compliance with our legal obligations
- When necessary for scientific or historical research or statistical purposes
- With your consent, when applicable

3. Alumni and Other Supporters

WPI holds personal information related to its alumni and other supporters (such as donors, prospective donors, volunteers, and family members of students). If you are one of our alumni or other supporter, we may collect and use the following types of personal information about you:

- Academic information (e.g., research, projects, major, transcript, degree, graduation date)
- Your contact information and biographical data (e.g., name, address, phone number, email address, date of birth, social security number, preferred pronouns, sex, gender, race, ethnicity, nationality, citizenship, sexual orientation, religious affiliation, family information)
- Your activities at WPI (e.g., club memberships)

- Your involvement with WPI and other interests (e.g., attendance at events, philanthropic interests, sponsorship of projects)
- Family information (e.g., marital status, name of spouse/partner and dependents)
- Health information (e.g., disability, food allergies)
- Financial information (e.g., history of donations, wealth information)
- Employment information and lifetime achievements
- Survey and interest information

We collect data about alumni and other supporters from various sources, including directly from the individual (for example, by filling out a form on our website) and from other individuals (for example, students provide information about family members). We also retain information from your student records if you studied here. We also collect information from publicly available sources, such as social media, and from third parties, such as companies that conduct wealth screening or other people that might know you and your philanthropic interests.

Your personal information is used for the following purposes:

- Sending you informational publications (e.g., WPI Journal, newsletters from departments and clubs you may have interest in)
- Conducting surveys so that we can learn more about our alumni and other supporters
- Providing services (e.g., networking, ongoing career services)
- Sending you information about fundraising campaigns, events, and mentoring and volunteer opportunities that may be of interest to you
- Conducting wealth analysis and research to understand your philanthropic interests and ability to give in order to ensure that our fundraising efforts are tailored to your interests
- For administrative purposes (e.g., processing donations and issuing a tax receipt, managing events, such as reunions)
- For research and statistical purposes
- To publicly acknowledge gifts (with consent of the donor)
- For compliance with legal obligations, 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 WPI's property, website, and other systems
- To meet the obligations of private organizations with oversight over WPI, such as accreditation organizations
- To protect the health, safety, or rights of you, other students, faculty, staff, and visitors

We share your personal information with the following:

- WPI schools, departments, clubs, and interest groups
- WPI volunteers, WPI Alumni Association, specific alumni clubs and organizations and similar affiliates
- Other individuals or entities with a legitimate interest in your personal information
- Vendors who provide services to WPI
- Governmental bodies as necessary for compliance with law, with law enforcement authorities when necessary, and other third parties to enforce our legal rights
- Private organizations with oversight over WPI, such as accreditation organizations.

With respect to personal information subject to the GDPR, we rely on the following lawful bases for processing:

- Our legitimate interests, such as maintaining alumni relationships and conducting fundraising activities
- To provide you with services or perform on contractual obligations, such as providing certain alumnae services
- For compliance with our legal obligations
- When necessary for scientific or historical research or statistical purposes
- With your consent, when applicable

4. For Everyone

For all categories of people, WPI may use or disclose your personal information to the extent necessary to protect the rights of WPI. This includes situations in which WPI has a good-faith belief that disclosure is necessary in order to protect, enforce or defend the legal rights, privacy, safety, security or property of WPI, its employees, students, or members of the public; to protect against fraud; or for other risk management purposes.

5. Website Visitors

The WPI website and other associated WPI web properties, including www.wpi.edu, is WPI's public information and communications system. It serves as the digital embodiment of WPI for all audiences, including students, employees, alumni, families, future employees, prospective students, supporters and friends, and others with an interest in WPI. If you visit this site to view or download information, or submit information to us, we or our third-party vendors may automatically collect the following types of personal information:

- the name of the domain from which you access the internet
- your approximate geographic region from which you access the internet
- the date and time of your visit

- the page(s) you visit and your engagement with them
- your computing platform (browser, operating system, etc.)

Some of this information may be collected through the use of cookies, which are text files that are placed on your hard disk by a web server, or similar technologies, such as web beacons. Some of these cookies are managed by third parties that we do not control, such as Google Analytics. You have the ability to accept or decline cookies by changing your browser settings. If you choose to decline cookies, some features on this website may not work properly.

If you use our website to complete forms, use our applications, or submit information to us (such as through form registration, requesting information, or making a donation), we will collect the information that you provide to us, as well as related information such as your login ID.

The data collected with cookies and similar technologies are used in the aggregate for purposes of analyzing site traffic, managing the site, and providing accountability regarding the usefulness of our work.

If you provide us with information (such as through our registration pages or forms), we will use that information for the purposes described on the form or registration pages.

We may also use your personal information for the following purposes:

- For compliance with legal obligations, 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 WPI's property, website, and other systems.
- To meet the obligations of private organizations with oversight over WPI, such as accreditation organizations
- To protect the health, safety, or rights of you, other students, faculty, staff, and visitors
- We may also share your email address and/or your browsing behavior with third-parties for use in targeted advertising campaigns

Personal information collected automatically on this website is not disclosed to third parties unless the third party is an institutionally authorized provider of services to WPI. Users of these services are subject to the privacy policies established by the third-party provider. One such third-party provider of services is Google, Inc. WPI, like many organizations, uses Google Analytics to analyze aggregate website traffic so that we can make the site more useful to our visitors.

This web site contains links to many sites that are beyond our control. WPI is not responsible for the privacy practices or content of these other sites. This is true even if you use your WPI login to log into an outside site, or if you are connecting to a WPI-related account on such a platform (for example, WPI's official social media pages). In these cases, use of your data is subject to the privacy policies established by the third-party provider, not by WPI. Public information in posts (e.g., name, username, comments, status updates, profile info, picture) are always public.

With respect to personal information subject to the GDPR, we rely on the following lawful bases for processing:

- Our legitimate interests, such as monitoring our website usage
- To provide you with services or perform on contractual obligations, such as managing our relationships with our suppliers and alumni
- For compliance with our legal obligations
- With your consent, when applicable

Transfer of Information to the United States

Some jurisdictions have adopted laws and regulations that include notice and other requirements that may apply to your personal information (together, "Privacy Laws"). Among those privacy laws are the General Data Protection Regulation for the European Economic Area (EEA) (regulation (EU) 2016/679 of the European Parliament) (the EEA GDPR) and the United Kingdom General Data Protection Regulation, as tailored by the Data Protection Act 2018 of the UK (the UK GDPR). It is WPI's intention to comply with the data protection rights that apply to its processing of personal information under different Privacy Laws, including but not limited to the EEA GDPR and the UK GDPR.

WPI is located in the United States. Information we collect from you will be processed by WPI in the United States and transferred to third parties, including our vendors, as described in this notice that may be located outside of the European Economic Area ("EEA") or the United Kingdom.

The United States has not sought nor received a finding of "adequacy" from the EEA or UK, 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 information is collected. With respect to transfers outside the EEA or UK, WPI generally relies on derogations or regulatory exceptions that allow for the transfer of information in specific situations. In particular, WPI collects and transfers personal information to the United States only with your consent, to perform on a contract with you (or in your interest), or to fulfill a compelling legitimate interest of WPI in a manner that does not outweigh your rights and freedoms. In some circumstances, the college may enter into standard contractual clauses governing the import of personal information. In all cases, WPI endeavors to apply suitable safeguards to protect the privacy and security of your personal information, particularly sensitive data, and to use it in a manner that is consistent with this Global Privacy Notice.

The EEA GDPR and the UK GDPR provide individuals with several specific data protection rights with respect to their personal information. These rights require a particular type of connection to the countries that are part of the EEA or the UK. These rights apply when WPI processes your personal information:

- As part of WPI acting in an established way in the EEA or UK, respectively,
- In connection with WPI offering goods or services to you when you are physically in the EEA or the UK, or

- When the processing is related to any monitoring of your behavior when you are physically in the EEA or UK.

The rights provided by the EEA GDPR and the UK GDPR are generally described below.

- The right of access. You have the right to confirmation of the personal information that is processed about you by WPI and to a copy of the information. Among the limitations for this right is that providing a copy will not adversely affect the rights of others.
- The right to correct. You have a right to have inaccurate personal information rectified, or taking into account the purposes of the processing, completed if it is incomplete.
- The right to erasure (also known as the right to be forgotten). You have a right to have your personal information erased in certain limited circumstances.
- The right to restrict processing and to object to use. You have the right to request the restriction or suppression of your personal information. This right only applies in certain circumstances. If processing is restricted, WPI would not be permitted to use the data without your consent, unless in connection with a legal claim, the protection of another person, or other exceptions. WPI would be permitted to continue to store the information.
- The right to data portability. The right to data portability allows you to obtain an electronic copy of your personal information to enable you to reuse that data for your own purposes across different services. This right allows you to move, copy or transfer personal information easily from one IT environment to another. This right only applies to information you have provided to WPI and depending on the context, applies to some of your information, but not to all of your information.
- The right to object. You have the right to object to the processing of your personal information in certain circumstances, in the absence of a compelling reason for the continued processing.
- To lodge a complaint with the EEA GDPR or UK GDPR supervisory authority or commissioner in the country where you habitually reside, where you work, or where you believe an infringement of the EEA GDPR or UK GDPR occurred, respectively.

Privacy Laws other than the EEA GDPR and the UK GDPR may provide you with similar rights with respect to your personal information. Please be aware that some Privacy Laws do not apply to non-profit institutions, such as WPI. Generally, a Privacy Law will require you to have a specific relationship to the jurisdiction in order to be entitled to exercise a personal data right. If you wish to exercise a data protection right under one of the Privacy Laws other than the EEA GDPR and the UK GDPR, please contact us.

These rights are not absolute and each right is subject to limitations. WPI's ability or obligation to comply with your requests may be limited by applicable law.

To request to exercise one of these rights, please contact us at privacy@wpi.edu. Before WPI can act on your request, we must confirm your identity and be supplied with sufficient information from you to locate the information you seek. Upon receipt of your completed request, we will endeavor to provide you information

on our actions promptly. If we determine not to fulfill your request, we will notify you our reasons for not doing so. If a person's request are clearly unfounded or excessive, we may charge a reasonable fee taking into account the administrative costs or decline to act on the request.

Retention of Data

WPI retains personal information in accordance with applicable WPI data retention policies or for audit or system integrity purposes.

Marketing Communications from WPI

WPI and the WPI Alumni Association periodically send marketing communications – such as newsletters and WPI publications, event invitations, fundraising information, and promotional events or services – by mail, email, text message, and telephone to students, faculty, staff, alumni, supporters, and other members of the WPI community, such as newsletters, event invitations, and fundraising information.

If you would like to request that WPI or the WPI Alumni Association limit or stop these marketing communications with you, please click on the unsubscribe link in the body of the message; respond "STOP" to the text message; or contact us by completing the form here: <https://www.wpi.edu/contact>. WPI and the WPI Alumni Associate do not share contact information collected for marketing purposes with third parties.

If you ask to be removed from WPI or the WPI Alumni Association's marketing communications, we will retain your contact information to ensure that we honor your request in the future. If applicable, we will also continue to process your personal information for other purposes consistent with this Global Privacy Notice.

Changes to this Global Privacy Notice

WPI reserves the right to change, modify, or otherwise amend this Global Privacy Notice at any time, for any reason, without notice to you. Any changes will be published, and you should check our website to access our current Global Privacy Notice. This Global Privacy Notice was last updated December 21, 2023.

Contact Information

The controller of the personal information described in this Global Privacy Notice is:

Worcester Polytechnic Institute
100 Institute Road
Worcester, MA 01609
Email: privacy@wpi.edu

Questions

If you have any question, concerns, requests or complaints regarding this Global Privacy Notice and the processing of personal information by WPI, please contact privacy@wpi.edu.

Request for Data Deletion

To request WPI delete your personal data, also known as the right to erasure or the right to be forgotten, you can contact WPI via the [Data Deletion Request Form](#). This right allows for your personal information to be erased in certain limited circumstances, particularly under the EEA GDPR and UK GDPR. WPI will require identity confirmation and sufficient information to locate the data to process your request.