

关于个人数据保护和请求同意处理的通知
NOTICE REGARDING PROTECTION OF PERSONAL DATA
AND REQUEST OF CONSENT FOR PROCESSING

Institute for the International Education of Students 下属分支机构 Study Abroad Foundation (简称“SAF”) 根据欧盟《通用数据保护条例》(以下简称“GDPR”) 发布以下通知。该条例于 2018 年 5 月生效, 内容涉及个人数据的处理和此类数据的自由传输, 包括在美国、欧盟和您的原籍国之间转移您的个人数据, 旨在为个人数据提供更好的保护。本通知将告知您 SAF 为开展海外学习项目而使用、处理和维持您的个人数据的方式, 并让您有机会同意使用、处理、分享和转移您的个人数据(包括敏感数据)。

The Study Abroad Foundation, a division of Institute for the International Education of Students (“SAF”) is providing you with the following notice, pursuant to the European Union, General Data Protection Regulation (hereinafter referred to as “GDPR”). This regulation, effective May 2018, pertains to the processing of your Personal Data and the free movement of such data, including the transfer of your Personal Data between the United States, the European Union and your home country and is designed to provide greater protection of your Personal Data. This notice will inform you of the ways in which your Personal Data is being used, processed and maintained by SAF to provide its study abroad programs and will give you the opportunity to consent to the use, processing, sharing and transfer of your Personal Data, including Sensitive Data.

1. 定义:

Definitions:

- a. “个人数据”是指与可参照某个标识符直接或间接识别身份的自然人相关的任何信息。标识符包括姓名、身份证号码、位置数据、在线标识符(如 IP 地址、图像)或与某人的身体、生理、基因、心理、经济、文化或社会身份相关的其他因素。

“Personal Data” is any information relating to a natural person who can be identified, directly or indirectly, by reference to an identifier. Identifiers include a name, identification number, location data, online identifiers such as IP addresses, images, or other factors related to the physical, physiological, genetic, mental, economic, cultural or social identity of a person.

- b. “敏感数据”是指揭示种族或民族起源、政治立场、宗教或哲学信仰的个人数据, 基因数据, 生物特征数据以及与健康或某人的性生活或性取向相关的数据。

“Sensitive Data” is Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, biometric data and data concerning health or a person’s sex life or sexual orientation.

- c. “处理”是指对个人数据或个人数据集执行的任何操作或一系列操作, 无论是否通过自动化方式, 例如收集、记录、组织、构建、存储、改编或更改、检索、咨询、使用、通过传输披露、传播或以其他方式提供、对齐或组合、限制、擦除或销毁。

“Processing” is any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2. 为了促进海外学习项目的实施，SAF 将根据其政策、程序和协议以及 GDPR，在适用范围内本着公平、合法、透明、限制目的、准确、限制存储、完整、保密、负责和保护隐私的原则，收集和处理您的个人数据（包括敏感数据）。SAF 可能会直接从您的原就读学校收集您的个人数据（包括敏感数据）。在涉及您的身心健康状况，或在适用法律另行规定的情况下，SAF 只会在您同意或者为保护您的切身利益而有所需要时处理敏感数据，以便建立、行使或捍卫合法要求。SAF 已采取必要的数据保护措施。

In order to facilitate your study abroad program, SAF will collect and process your Personal Data, including Sensitive Data, in accordance with its policies, procedures, and protocols, the GDPR, to the extent applicable, and with the principles of fairness, lawfulness, transparency, purpose limitation, accuracy, storage limitation, integrity, confidentiality, accountability, and the protection of your privacy. SAF may collect your Personal Data, including Sensitive Data, directly from your home institution. SAF will only process Sensitive Data with your consent, or where necessary to protect your vital interests, for the establishment, exercise or defense of legal claims, in relation to your physical and mental health conditions, or as otherwise specified under applicable law. SAF has adopted required data protection measures.

3. 所有个人数据（包括敏感数据）的处理均应出于 SAF 的机构目的，与您申请以及我们管理 SAF 项目有联系或相关。我们将出于以下目的处理您所提供或我们所收集的数据：

All Personal Data, including Sensitive Data, shall be processed for SAF's institutional purposes, connected or related to your application for and the administration of an SAF program. The data supplied or collected will be processed for the following purposes:

- a. 履行任何适用法律规定的义务；

To fulfill the obligations established by any applicable law;

- b. 遵守与您申请、注册和参加 SAF 项目相关的合同义务，包括但不限于紧急、医疗、学术、纪律、法律、危机应对或者身体或心理健康相关问题，此类问题涉及您或注册的 SAF 项目或与之相关；

To abide with contractual obligations related to your application for and enrollment and participation in a SAF program, including without limitation emergency, medical, academic, disciplinary, legal, crisis response or health or mental health related issues involving or related to you or the SAF program in which you are enrolled;

- c. 仅出于保护您的健康或安全或者履行适用法律规定的义务之目的，处理有关您的身体、心理健康状况以及饮食限制的敏感数据；

Sensitive Data concerning your physical health, mental health conditions and dietary restrictions will only be processed for the purpose of protecting your health or safety or fulfilling the obligations established by applicable law; and

- d. 仅出于涉及健康或安全紧急情况以及遵守适用法律之目的，处理您可能向 SAF 提供的或由公共机构或第三方通过其他方式提供给 SAF 的有关司法措施或法律程序（例如逮捕、作为证人或提供证词）的敏感数据。

Sensitive Data regarding judicial measures or legal proceedings such as an arrest, serving as a witness or providing a deposition, which you may provide to SAF or has otherwise been

provided to SAF by a public body or a third party, will be processed only for purposes relating to a health or safety emergency and complying with applicable law.

e. 必须提交和处理个人数据才能达到上述目的。

Submittal and processing of Personal Data is necessary in order to achieve the purposes specified above.

4. 拒绝同意处理或转移您的个人数据（包括敏感数据）可能导致 SAF 无法开展与您的国际项目相关的必要活动，或履行与您的 SAF 项目相关的合同义务，以及法律规定的义务。

Any refusal to consent to the processing or transferring of your Personal Data, including Sensitive Data, may make it impossible for SAF to carry out activities necessary in connection with your international program or to meet contractual obligations in connection with your SAF program, as well as the obligations imposed by law.

5. SAF 只会按照适用法律在本文规定的范围内，由控制和负责处理您的申请和管理您注册的 SAF 项目的 SAF 员工、代理和代表处理您的个人数据（包括敏感数据）。数据处理活动将在 SAF 中心（即项目所在地）以及美国 SAF 处理中心开展，包括但不限于 SAF 的总部，地址：1100 W 42nd Street, Suite 385, Indianapolis, Indiana, 46208 USA 以及 33 West Monroe Street, Suite 2300, Chicago, Illinois 60603, USA。您的敏感数据将由被任命或指定处理此类数据的人员在 SAF 内部处理。根据适用法律，您的个人数据（包括敏感数据）可能会在您的原籍国、美国和您将参加 SAF 项目的欧洲中心之间转移。如果您病重，受伤，成为骚扰、不当性行为和/或犯罪行为的受害人或被指控行为人，SAF 还可能与您的指定紧急联系人、原就读学校以及接收学校分享您的个人数据（包括敏感数据）。如果您在任何时候选择拒绝或撤销同意，您可以继续参加 SAF 项目，但 SAF 可能无法与您的紧急联系人、家长、监护人或原就读学校分享您的健康和安全管理信息以及其他信息。

SAF will only process your Personal Data, including Sensitive Data, in accordance with applicable law on the terms set forth herein, by those employees, agents and representatives of SAF who are in charge of and responsible for processing your application and administering the SAF program in which you enroll. These activities are based at the SAF center where your program is based and at SAF processing centers in the U.S. including without limitation at SAF's headquarters located at 1100 W 42nd Street, Suite 385, Indianapolis, Indiana, 46208 USA and 33 West Monroe Street, Suite 2300, Chicago, Illinois 60603, USA. Your Sensitive Data will be handled within SAF by persons appointed or assigned to handle such data. Your Personal Data, including Sensitive Data, may be transferred between your home country, the U.S. and the European based center where you will be attending an SAF Program, pursuant to applicable law. SAF may also share your Personal Data, including Sensitive Data, with your designated emergency contact, your home institution and your host institution if you are seriously ill, suffer an injury, are the victim or alleged perpetrator of harassment, sexual misconduct and/or criminal behavior. If you choose to withhold or withdraw your consent at any time, you may proceed with the SAF program, but SAF may not be able to share information about your health and safety as well as other information with your emergency contact, parent, guardian or with your home institution.

6. 您的个人数据（包括敏感数据）可能按照上述规则被传达给公共或私人主体，以便履行您与 SAF 签订的合同协议、SAF 可能与您的原就读学校或接收学校签订的协议以及法律、法规或

美国和/或欧盟法律中规定的义务；敏感数据可能被传达给公共机构和当局（如公立医院、公共安全机构、执法机关、法院和地方法官）以及私人主体（如私人医院和诊所、安全主管、医生、治疗师和顾问以及保险公司），仅出于与身心健康、安全、紧急情况和危机应对相关以及履行适用法律法规规定的义务之目的。

Your Personal Data, including Sensitive Data, may be communicated, in compliance with the rules indicated above, to public or private subjects in order to fulfill obligations set forth by your contractual agreement with SAF, agreements SAF may have with your home campus or host university and laws, regulations or U.S. and/or European Union laws; Sensitive Data may be communicated to public bodies and authorities (such as public hospitals, public safety authorities, law enforcement offices, courts, and magistrates) and to private subjects (such as private hospitals and clinics, security supervisors, doctors, therapists and counselors and insurance companies) only for purposes relating to health, mental health, safety, emergency and crisis response and for the purposes of fulfilling obligations set forth by applicable laws and regulations.

7. 您的个人数据（包括敏感数据）将根据 SAF 的记录保留政策、适用法律以及在您的 SAF 项目结束后提供服务的要求（包括仅作为示例）存储，用于在今后的任何时候签发成绩单。

Your Personal Data, including Sensitive Data, will be stored in accordance with SAF's policies on record retention, applicable law and as required to provide services after the conclusion of your SAF program including by way of example only, for the purposes of issuing transcripts at any time in the future.

8. 所有数据都将由 SAF 根据适用法律以数据控制人的身份在数据管理员 Jamey Vester 的监督下进行处理，您可以通过致电 312-944-1750 或发送电子邮件至 saf-gdpr@safabroad.org 进行联系。

All data will be processed by SAF in its capacity as Data Controller with the supervision of Jamey Vester, Data Manager, in compliance with applicable law, whom you can reach at 312-944-1750 or via email at saf-gdpr@safabroad.org.

9. 如果您同意处理和转移您的个人数据（包括敏感数据），则可以随时以书面形式联系 Jamey Vester（电子邮箱：saf-gdpr@safabroad.org）撤销您对处理和/或传输您的个人数据（包括敏感数据）的同意。撤销不具有追溯效力，也不会影响 SAF 在您拒绝或撤销同意之前处理的个人数据（包括敏感数据）的处理或转移合法性。如果您撤销或拒绝同意，IES Abroad 可能会继续处理您的个人数据，前提是它具有处理您的个人数据的法律依据。

Provided you consent to the processing and transferring of your Personal Data, including Sensitive Data, you may withdraw your consent to process and/or transfer your Personal Data, including Sensitive Data, at any time by contacting Jamey Vester in writing at saf-gdpr@safabroad.org. This withdrawal will not be retroactive and will not affect the lawfulness of the processing or transfer of Personal Data, including Sensitive Data, processed by SAF prior to your withholding or withdrawing of consent. If you withdraw or withhold your consent, IES Abroad may continue to process your Personal Data, if it has a legal basis for processing your Personal Data.

10. 在适用范围内，您可以行使 GDPR 预见的任何及所有其他权利，即访问权、纠正权、擦除权或“被遗忘权”、处理限制权、数据可携权以及反对权。GDPR 在适用的范围内对任何侵犯

个人隐私的行为提供法定权利和补救措施，您有权向即将留学的国家的主管监督当局提起诉讼。

You will be able to exercise any and all other rights foreseen by the GDPR, to the extent applicable, namely right of access, right to rectification, right to erasure or “right to be forgotten”, right to restriction of processing, right to data portability, and the right to object. The GDPR, to the extent applicable, provides legal rights and remedies against any breach of personal privacy and you have the right to file a complaint with the competent supervisory authority in the country where you will be studying abroad.

INTENTIONALLY LEFT BLANK

请填写以下信息:

Please complete the following:

学生姓名 (名字和姓氏): YongYan Lin
Student's Name (First and Last):

学生住址: Room 03201, Road Wusi, District Gulou, Fuzhou, Fujian
Student's Residential Address:

学生出生日期: 07/08/1998
Student's Date of Birth:

项目地点和期限: University of Edinburgh 09/2018-05/2019
Program Location and Term:

原就读学校: Nanchang University
Home Institution:

为了本通知及同意的目的, 原始签名的副本应具有约束力, 并与原始签名具有同等效力。
For purposes of this Notice and Consent, a copy of an original signature shall be binding and given the same effect as an original signature.

我特此:

I hereby:

☒ 同意
☒ give my consent

☐ 不同意
☐ do not give my consent

将我的个人数据 (包括敏感数据) 用于本通知所述目的。
for the use of my Personal Data, including Sensitive Data, for the purposes outlined in this notice.

我特此:

I hereby:

☒ 同意
☒ give my consent

☐ 不同意
☐ do not give my consent

将我的敏感数据用于本通知所述目的, 这些数据包括揭示种族或民族起源、政治立场、宗教或哲学信仰的个人数据, 基因数据, 生物特征数据以及与我的性生活或性取向有关的数据。
for the use of my Sensitive Data for the purposes outlined in this notice, these being Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, biometric data, data concerning health or my sex life or sexual orientation.

我特此:

I hereby:

☒ 同意

☒ give my consent

☐ 不同意

☐ do not give my consent

根据本文的规定在美国、欧盟和我的原籍国之间转移我的个人数据（包括敏感数据）。

for my Personal Data, including Sensitive Data, to be transferred between the United States, the European Union and my home country as set forth herein.

我特此:

I hereby:

☒ 同意

☒ give my consent

☐ 不同意

☐ do not give my consent

SAF 根据适用法律，在我病重，受伤，成为骚扰、不当性行为和/或犯罪行为的受害人或被指控行为人的情况下，与我的指定紧急联系人、原就读学校和接收学校分享我的个人数据（包括敏感数据），并且授予 SAF 员工和行政管理人员充分的权利，向我的指定紧急联系人、原就读学校和接收学校报告任何和所有此类事件，无论是否涉及纪律处分。我理解，如果我不同意，SAF 可能无法与我的紧急联系人、家长、监护人或我的原就读学校分享我的健康和安全性相关信息以及其他信息，并且在我的 SAF 项目所在地发生恐怖主义行动或类似紧急情况时，SAF 可能无法与我的紧急联系人确认我的安全或行踪。

for SAF to share my Personal Data, including Sensitive Data, with my designated emergency contact, my home institution and my host institution if I am seriously ill, suffer an injury, am the victim or alleged perpetrator of harassment, sexual misconduct and/or criminal behavior, and I grant SAF staff and administrators full authority to report to my designated emergency contact, my home institution and my host institution any and such all incidents, under the applicable laws, regardless of whether it involves disciplinary action. I understand that if I do not consent, SAF may not be able to share information about my health and safety as well as other information with my emergency contact, parent, guardian or my home institution and may not be able to confirm my safety or whereabouts with my emergency contact in the event of an act of terrorism or similar emergency where my SAF program is located.

签署本文件即表明，我保证我已阅读并理解本通知及同意的内容，并且我没有修改任何地方。

By signing this document, I certify that I have read and understand the contents of this Notice and Consent and I have not modified it in any respect.

林泳妍

学生正楷姓名

Print Name of Student

林泳妍

学生签名

Signature of Student

25/05/2018

日期

Date