

Georgia Institute of Technology

EU GDPR Lawful Basis Form

Introduction

Beginning May 25, 2018, some of Georgia Tech's activities will be 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").

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 GT ID#, GT Account (User ID), physical address or other location data, IP address or other online identifier, etc.

Georgia Tech 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.

Should you have any questions about this form, please contact: support@irp.gatech.edu.

Stewardship

Business Domain:

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

Business Area:

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

Data Steward Name:

Data Steward Email Address:

Data Trustee Name:

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

Q1

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
-

Q2 (If Q1 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.

Q3

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
 - I need someone to contact me about Records Retention
-

Q4

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.

Q5

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

Q6

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

Q7

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

Yes

No

Q8 (If Q7 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.

Please separate types of personal data with semicolons.

Q9

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

Q10 (If Q9 is Yes)

Please describe the data security measures utilized.

Please separate data security measures with semicolons.

Q11

Does your office share with other Georgia Tech units any of the personal data you collect or process from people while they are located in the EU?

Yes

No

Q12

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?

Yes

No

Q13 (If Q12 is Yes)

Please name the third-parties with whom you share personal data.

Please separate third-party names with semicolons.

Q14

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

Q15

Do you link to the Georgia Tech Privacy Notice on your website homepage?

See *Georgia Tech Legal & Privacy Information Notice*:

<http://www.gatech.edu/legal>

- Yes
- No
- Do not have a website

Q16

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"

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Genetic or biometric data
- Health data
- Data concerning a person's sex life or sexual orientation
- Trade union memberships
- Criminal convictions or offenses
- None - Do not collect sensitive personal data

Q17 (If Q16 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.

Q18 (If Q16 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

Q19 (If Q16 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

Q20 (If Q16 is not None)

Do you get affirmative written consent from the person before you collect this type of **sensitive personal data**?

Yes

No
