

## DATA PRIVACY NOTICE FOR STUDENTS

This Notice describes St. John’s University (“St. John’s”) practices with respect to the collection, use, storage, and disclosure (“processing”) of Personal Information covered by the European Union’s General Data Protection Regulation about students enrolled at St. John’s or accessing services provided at a St. John’s location. This Notice applies to the St. John’s location at 8000 Utopia Parkway, Queens, New York 11439 as well as to its affiliated campuses in Rome, Italy; Paris, France; Staten Island, New York; Hauppauge, New York; and New York, New York; and its global studies programs (such as the program affiliation with Mary Immaculate College in Limerick, Ireland) (collectively “St. John’s,” “us” or “our”). Global studies programs refers to any St. John’s sponsored student international travel programs (including global programs that do not include an academic/study component). All students (referred to below as “you” or “your”) should carefully read the provisions of this Privacy Notice.

“Personal Information,” as used in this Notice, means any information that can be used to identify you, whether directly or indirectly, including by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

<p><b>Questions?</b></p>	<p>You can contact St. John’s Office of General Counsel with any questions about this notice, our data collection practices, or your rights:</p> <p>St. John’s University          Attn: Joshua Hurwit, Associate General Counsel          8000 Utopia Parkway          Queens, New York 11439</p> <p>This general notice may be supplemented by additional notices at the point of any data collection. If you have specific questions about any of the data processing activities described in this or any other notice, please contact the individual identified above.</p>
<p><b>The Information We Process About You</b></p>	<p>We process the information we collect from you directly, including during our communications with you, when you sign up for classes or other services, when you make use of St. John’s equipment, facilities, and resources, when you take classes, when you apply for financial aid, when you make use of the Student Health Center, when you utilize services of third-party vendors that contract with St. John’s such as the St. John’s University Rome campus, the St. John’s Paris Association, Mary Immaculate College, health insurers, hotels, travel agents and tour providers, and when you respond to communications that emanate from St. John’s and/or third-party vendors that contract with St. John’s. This includes information about you created by our faculty and staff, like your grades, scores, records of attendance and participation, and recorded observations about you. It also includes information about your payments made to us for tuition and other expenses.</p> <p>In some cases, certain information will be required in order for St. John’s to enroll you in a program or class, determine your eligibility for financial aid or use of a resource, or otherwise provide you with the service you are requesting. We will mark that information as “Required” or “Mandatory.”</p>

	<p>Failure to provide required or mandatory information may result in your being denied enrollment, eligibility, or other services that St. John's offers.</p> <p>In addition, we collect the following kinds of information about you from third parties:</p> <ul style="list-style-type: none"> <li>- Information we collect from other students, St. John's staff or third-party vendors: St. John's staff, other students or third-party vendors (such as the St. John's University Rome campus, the St. John's Paris Association, Mary Immaculate College, health insurers, hotels, travel agencies, and tour providers) may provide us with information about you, whether in the process of reporting an incident on campus, alerting us to an emergency situation involving you, or making an inquiry about you. This information can include your name, information about your behavior or activities, and other information about the situation being reported to us.</li> <li>- Information we receive about you from journals, research publications, or other platforms through which you publish academic content.</li> <li>- Health, wellness, and insurance information about you that we receive from other healthcare providers and/or insurance companies.</li> <li>- Information about your prior or concurrent educational history, which we collect from other educational institutions (or from our own records in the event of a re-enrollment, enrollment for a different degree, or application for a global studies program).</li> <li>- Information about you provided by commercial and non-commercial vendors that we contract with.</li> </ul>
<p><b>Purposes and Legal Basis for Processing Your Data</b></p>	<p>We process your Personal Information to operate St. John's and the programs you are enrolled in, to provide you with financial aid, to provide you with additional related services (like housing, internet access, and health services through the Student Health Center and other programs). We also use this data to:</p> <ul style="list-style-type: none"> <li>- administer programs and make decisions about course offerings,</li> <li>- file required reports with applicable governmental authorities,</li> <li>- award financial aid,</li> <li>- facilitate class diversity,</li> <li>- administer our programs and provide appropriately tailored services, including student health services, financial aid, research and reporting activities, service opportunities, and excursions for global studies programs,</li> <li>- monitor trends within our student body and individual courses,</li> <li>- plan course offerings,</li> <li>- verify identity,</li> <li>- ensure that the university is prepared for emergencies,</li> <li>- enforce St. John's policies, including but not limited to the Student Code of Conduct, and applicable laws,</li> </ul>

- manage university billing, collecting, refunding and cashiering functions,
- provide desktop and software support services,
- provide immigration and mobility services for you when you travel abroad to study, teach, or research,
- deliver online courses,
- manage admission and enrollment for global studies programs,
- facilitate internal research,
- plan orientation and support services for students studying at a campus other than their primary campus,
- perform academic planning for global studies programs,
- coordinate events such as conferences and professional development, and
- facilitate student directory and promotional activities.

We combine the data that we collect in order to provide these functions.

We have the following legal basis for processing the information you provide us or that we collect about you.

We have a legitimate interest in retaining and educating qualified students, complying with laws and regulations that govern our conduct in the countries where we operate, and administering St. John’s and its programs in an efficient, ethical, and appropriate manner. We process all the information we collect from or about you to meet these purposes. You can obtain additional information about the legitimate interests we have in processing your information by contacting the Office of General Counsel.

During the period of your enrollment, we may also be required to process your Personal Information to complete a contract that you have entered into with us, including to be admitted to a program, or receive financial aid, housing, or another service from us. You can obtain additional information regarding processing we do to enter into contracts with you by contacting the Office of General Counsel.

We may also be required to process your Personal Information to comply with laws applicable in the European Union or its member states.

You can obtain additional information about the processing we do to comply with applicable laws by contacting the St. John’s Office of General Counsel.

In the case of Sensitive Personal Information (which includes information about your health, race, ethnicity, national origin, criminal convictions, religious or philosophical beliefs, sexual orientation, and trade union membership), we process information either (i) because we have your consent to do so or (ii) because we are required to process the information to comply with applicable laws. For example, we are required to process sensitive data to comply with: Federal financial aid laws, federal and state

	<p>tax laws, federal and state education laws, and federal and state anti-discrimination laws.</p> <p>You can obtain more information about these laws by contacting the Office of General Counsel. When we process your Sensitive Personal Information on the basis of your consent, you may withdraw that consent at any time by contacting the Office of General Counsel. If you withdraw your consent, we may still be required to process your Sensitive Personal Information to comply with applicable law, but we will explain to you at the time your consent is withdrawn what processing activities will continue for legal compliance purposes.</p> <p>Finally, we process your Personal Information for purposes compatible with those already described, including for the purposes of conducting scientific, statistical, or historical research or for the purpose of creating archives in the public interest. Where possible, we do not use identifiable information for these purposes, or we take steps, including making use of pseudonymous data, to limit the amount of Personal Information we use in our research or archives.</p>
<p><b>Recipients of Your Personal Information</b></p>	<p>Your Personal Information will be received and processed by St. John’s employees and personnel, including third parties who provide services to St. John’s in connection with the purposes of processing described above. We share your Personal Information with our service providers only when they have agreed to process your Personal Information only to provide services to us and have agreed to protect your Personal Information from unauthorized use, access, or disclosure. You may contact the Office of General Counsel to learn more about the categories of service providers to whom your data is disclosed.</p> <p>We also disclose your information to government authorities as required by laws that regulate immigration, tax, national security, and criminal activity.</p>
<p><b>Transfers to Third Countries</b></p>	<p>St. John’s is headquartered in the United States with global studies programs in the EU. We transfer your data to the United States and to the countries where we operate global studies programs. St. John’s offers global studies programs in Rome, Italy; Paris, France; and Limerick, Ireland; as well as other locations in the European Union. If you apply to one of our global studies programs your data will be sent to our US campuses in New York and the applicable global studies program location(s) to facilitate your enrollment in the program and provide related services to you before, during and after the program.</p> <p>St. John’s has executed Standard Contractual Clauses, as approved by the European Commission. These clauses permit St. John’s to transfer data from the EU to third countries, including the United States. If you would like to receive a copy of St. John’s Standard Contractual Clauses, you can contact the Office of General Counsel.</p>

<b>Data Retention</b>	<p>We keep data about prospective student applicants for no less than 7 years, and data about actual applicants for no less than 7 years. If you are accepted to and enroll at St. John’s, then we retain your data throughout your period of enrollment and for a period of no less than 30 years thereafter. We may be required by law to retain your information for a longer period, for example, in order to comply with a subpoena. If you have any questions, you may contact the Office of General Counsel.</p>
<b>Your Rights</b>	<p>You have the right to the following information regarding St. John’s processing of your Personal Information:</p> <ul style="list-style-type: none"> <li>• the purposes of the processing,</li> <li>• the categories of Personal Information concerned,</li> <li>• the recipients or categories of recipients to whom the Personal Information have been or will be disclosed,</li> <li>• where possible, the envisaged period for which the Personal Information will be stored, or, if not possible, the criteria used to determine that period.</li> </ul> <p>This Privacy Statement is intended to provide this information. Any questions about these details may be directed to the Office of General Counsel.</p> <p>You also have the following additional rights with respect to your Personal Information:</p> <ul style="list-style-type: none"> <li>• The right to request access to the Personal Information that St. John’s has about you, as well as the right to request rectification of any data that is inaccurate or incomplete.</li> <li>• The right to request a copy of your Personal Information in electronic format so that you can transmit the data to third parties, or to request that St. John’s directly transfer your Personal Information to one or more third parties.</li> <li>• The right to object to the processing of your Personal Information for marketing and other purposes.</li> <li>• The right to erasure of your Personal Information when it is no longer needed for the purposes for which you provided it, as well as the right to restriction of processing of your Personal Information to certain limited purposes where erasure is not possible.</li> <li>• The right to lodge a complaint with the supervisory authority where you believe that your rights have been violated.</li> </ul>