Georgia Institute of Technology
EU GDPR Lawful Basis Form

Introduction
Q1
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 form 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: eugdpr@edm.gatech.edu

Steward
Q2
This EU GDPR Lawful Basis form is required for any Georgia Tech unit or affiliated/cooperative organization that collects or processes data about people while they are in the EU. The unit’s Data Steward, or their designee, is responsible for completing this form.

The questions on this page inquire about the categorization of data the unit collects or processes, as well as contact information for the Data Steward, Data Trustee, and where applicable the Data Steward’s designee. The following definitions may help you determine how to answer these questions.

Business Domain:
A high-level categorization for the type of data the unit collects or processes.

Most Georgia Tech data should fall under one of the following domains:
- Student
- Finance
- Human Resources
• Services & Resources
• Research Affiliated/Cooperative Organizations

Note: If your type of data does not fit one of these business domains, please type what you feel would be appropriate.

**Business Area:**
A detailed level categorization for the type data the unit collects or processes.

Here are a few examples of business areas for a given business domain:
- Undergraduate Admissions (within the Student domain)
- Accounts Payable (within the Finance domain)
- Payroll (within the Human Resources domain)
- Parking (within the Services & Resources domain)
- Alumni Association (within the Affiliated/Cooperative Organizations domain)

**Data Steward:**
Faculty or staff member who has been assigned as the person directly responsible for the care and management of a certain type of data at Georgia Tech. Data Stewards are ultimately responsible for access to the data they manage.

**Data Trustee (Chief Data Steward):**
Typically, an executive or senior level director who defines guiding principles and policies for the use of Institute data, who delegates authority to a Data Steward to implement data controls and access at the unit level.

Note: more information about Data Stewards and Data Trustees (Chief Data Stewards), please review the Data Access policy in the Georgia Tech Policy Library (link).

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Q3
**Business Domain (see guidelines above)**

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Q4
**Business Area (see guidelines above)**

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Q5
Data Steward (see guidelines above)

○ Name (first and last) ________________________________________________

○ GaTech Email Address ________________________________________________

Q6
Data Trustee (see guidelines above)

○ Name (first and last) ________________________________________________

○ GaTech Email Address ________________________________________________

Q7
If you are filling out this form on behalf of a Data Steward, please provide your own contact information

○ Name (first and last) ________________________________________________

○ GaTech Email Address ________________________________________________

Q8
Occasionally a Data Steward may be responsible for more than one Business Domain and Area. For example, within the domain "Finance", one Data Steward may oversee both the "Accounts Payable" area and the "Travel & Expense" area.

If you oversee more than one Business Domain and Area, you will need to fill out a Lawful Basis Form for each.

○ I am not a Data Steward for more than one Business Domain and Area

○ I am a Data Steward for more than one Business Domain and Area, and will complete a Lawful Basis form for each
Questions

Q9
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

Q10
Please list below the third-parties from whom you receive personal data.

__________________________________________________________________

__________________________________________________________________

__________________________________________________________________

__________________________________________________________________

Q11
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
Q12
For what business purpose(s) does your office collect or process personal data about people while they are located in the EU?
________________________________________________________________
________________________________________________________________
________________________________________________________________
________________________________________________________________
________________________________________________________________
________________________________________________________________

Q13
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

Q14
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
Q15
Are you using the personal data for any reason(s) other than the reason(s) for which it was originally collected?

☐ Yes

☐ No

Q16
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.

________________________________________________________________
________________________________________________________________
________________________________________________________________
________________________________________________________________

Q17
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
Q18
Please describe the data security measures utilized.
________________________________________________________________
________________________________________________________________
________________________________________________________________
________________________________________________________________
________________________________________________________________

Q19
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

Q20
Does your office share with third-parties (outside of Georgia Tech) any of the personal data you collect or process from people while they are located in the EU?

○ Yes
○ No
Q21
Please name the third-parties (outside of Georgia Tech) with whom you share personal data.

________________________________________
________________________________________
________________________________________
________________________________________

Q22
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

Q23
Do you link to the Georgia Tech Privacy & Legal Notice on your website homepage?

See Georgia Tech Privacy & Legal Notice:
http://www.gatech.edu/privacy

○ Yes
○ No
○ Do not have a website
Q24
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

Q25
For what business purpose(s) does your office collect or process sensitive personal data about people while they are located in the EU?

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
Q26
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

Q27
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

Q28
Do you get affirmative written consent from the person before you collect this type of sensitive personal data?

○ Yes
○ No

Q29
This concludes the Lawful Basis form.
Please click the left arrow if you wish to review any of your answers.
Please click the right arrow to submit your responses.