

Georgia Institute of Technology

EU GDPR Lawful Basis Form

Introduction

Q1

Beginning May 25, 2018, some of Georgia Tech's activities are 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 Admission (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 (<http://www.policylibrary.gatech.edu/data-access>).

Q3
Business Domain (see guidelines above)

Q4
Business Area (see guidelines above)

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

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.

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
 - 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 signed consent (digital signature okay) 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.

Preview