



Ellucian Applicant Privacy Policy

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Ellucian Applicant Privacy Policy

This Ellucian Applicant Privacy Policy (the “Applicant Privacy Policy”) governs how Ellucian collects and Processes the Personal Data of job applicants and other prospective employees (collectively referred to as “Applicants”).

Protecting the confidentiality and integrity of Personal Data is a critical responsibility that Ellucian takes seriously. As used in this Applicant Privacy Policy, (a) “Personal Data” means any information relating to an Applicant, or to any family member, emergency contact person, beneficiary, dependent or other person whose information Ellucian has because of a relationship between Ellucian and an Applicant; and (b) to “Process” Personal Data means 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 deletion.

Ellucian also has an Employee Data Privacy Policy (“Employee Privacy Policy”). Starting on the date an Applicant agrees to an offer of employment, the Employee Privacy Policy, and not this Applicant Privacy Policy, will apply. A copy of the Employee Privacy Policy is available upon request. The Employee Privacy Policy, and not this Applicant Privacy Policy, applies to any Applicant who is already an Ellucian employee.

If you have any questions related to Ellucian’s use of your Personal Data or this Applicant Privacy Policy, please contact our Data Protection Officer at privacy@ellucian.com.

How Do We Get Personal Data?

We collect Personal Data from Applicants. We may collect Personal Data from other sources during the hiring process, including during conversations with references, background checks, or when we confirm education or prior employment. We may collect Personal Data from our internal records about prior applicants, referrals, third-party recruitment agencies, search engine tools, employment portals, job boards or other sites and services that connect applicants with potential employers, for example LinkedIn.

What Personal Data Do We Process?

The Personal Data we Process about you may include information needed in order to administer recruitment and hiring processes and the prospective employment relationship. Ellucian may Process any of the Personal Data types listed below. The Personal Data types that Ellucian Processes vary by region, and not all data types will be Processed for every Applicant. The list of Personal Data types below is not exhaustive and may change based on our business or contractual needs.

Name and initials: first name, middle name, last name(s), initials

Contact information: phone number, email address, postal address, emergency contact details

Education and professional qualifications: degrees and schooling information, licenses and professional memberships, professional certifications, training courses completed

Professional and employment information: resume and summary of work experience, occupation/title, employer name, desired job position, information about prior employment, including salary data

Personal characteristics: date of birth, gender, personal pronouns, nationality, leisure and interests, preferences, photographs and video, military or veteran status

Systems and Facilities information: user name, password, other login credentials, usage tracking of IT assets, IT systems or facilities, cookies or other online identifiers

Special categories of Personal Data: racial or ethnic origin, background checks, criminal convictions, health or medical information for the purposes of determining any necessary accommodations

Other Personal Data types: national identification number, passport number, alien registration or Visa number, state/province-issued identification number, driver's or operator's license number, other government-issued identification number, credit report information, frequent traveler number

Why Do We Process Personal Data?

We collect, use and/or otherwise Process Personal Data where: (a) it is necessary for the performance of our business, including but not limited to, information security and employee safety and monitoring; (b) we are permitted or required to do so by applicable law; (c) it is necessary in connection with the employment relationship; or (d) it is used for the protection of Ellucian assets. We may Process Personal Data for any of the purposes described in this section. The description of purposes below is not exhaustive and may change based on our business or contractual needs.

Business Operations: operating and managing IT; improving internal systems, communications systems and facilities; managing company assets; allocating company assets and human resources; strategic planning; project management; business continuity; compilation of audit trails and other reporting tools; maintaining records relating to business activities, budgeting, financial management and reporting; communications; managing mergers, acquisitions, sales, reorganizations or disposals and integration with purchaser; monitoring use of Ellucian's facilities and information technology systems and the information contained in such systems, including traffic and usage data.

Compliance: complying with legal and other requirements; record-keeping and reporting obligations; physical access policies; conducting audits; management and resolution of health and safety matters, compliance with government inspections and other requests from government or other public authorities; responding to legal process such as subpoenas; pursuing legal rights and remedies; defending litigation and managing any internal complaints or claims; conducting audits and investigations and complying with internal policies and procedures.

Managing Workforce: managing work activities and personnel generally, including recruitment, hiring decisions, succession planning, rehiring, performing workforce analysis and planning, performing surveys, performing background checks, providing access to facilities, reviewing employment decisions, making business travel arrangements, managing business expenses and reimbursements, and creating and maintaining one or more internal Applicant databases.

Communications, Facilities and Emergencies: facilitating communication with you; protecting the health and safety of employees and others; safeguarding and maintaining IT infrastructure, office equipment, facilities and other property; facilitating communication with you and your nominated contacts in an emergency.

Where Do we Process Personal Data?

Personal Data may be transferred from the country in which it was collected to be used or stored at any of Ellucian's locations worldwide, including in the U.S., in Ellucian's centralized information technology systems, which allow authorized U.S. and non-U.S. Ellucian management and other personnel who have a need to review and analyze that data.

With Whom Do We Share Personal Data?

Ellucian personnel involved with the hiring process will have access to your contact information and other Personal Data that you provide. Access to, use of and other Processing of Personal Data by Ellucian generally will be limited to individuals who have a need to know the information for the purposes described in this Applicant Privacy Policy, which may include your prospective management team or others appointed by them, as well as personnel on the People team or in IT, Legal & Compliance, and Finance and Accounting departments. In some office locations, Ellucian or its landlord collects building access data and video footage.

If Ellucian makes travel arrangements for you, we may Process Personal Data about your travel preferences and travel-related information such as costs and frequent traveler account numbers.

Interviews and other conversations may take place in person or via phone or video using third-party technology. If you apply for a position via our website, the applicant portal is provided by a third-party, which may collect usage metrics or tracking data.

From time to time, we may make Personal Data available to other parties, such as legal and regulatory public authorities; external professional advisors (such as lawyers, accountants etc.); and service providers (such as providers of facilities, human resources services, security, IT systems and support, and other third-parties engaged to assist Ellucian in carrying out business activities) located wherever they operate.

Before transferring Personal Data to a third-party, Ellucian will confirm that the third-party will safeguard Personal Data in a manner consistent with this Applicant Privacy Policy, limiting the third-party's use of the Personal Data to the specified services provided on Ellucian's behalf. Disclosures to third-parties, whether an agent of Ellucian or not, will be only for the purposes described in this Applicant Privacy Policy (as updated from time to time) or for a compatible purpose, unless otherwise permitted by applicable law. Ellucian will take reasonable and appropriate steps to (i) ensure that third-party agents and service providers Process Personal Data in accordance with this Applicant Privacy Policy, and (ii) stop and remediate any unauthorized Processing.

Ellucian may disclose Personal Data to third-parties¹ other than service providers: (a) if we are required to do so by law, regulation or legal process (such as a court order or subpoena); (b) in response to requests by government agencies; or (c) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity.

How Do We Protect Personal Data?

Ellucian is committed to safeguarding Personal Data. Ellucian takes reasonable steps to ensure that the Personal Data it collects is accurate, complete, current, and reliable for its intended use. While Ellucian cannot guarantee the security of the Personal Data that it handles, Ellucian takes reasonable measures to maintain the confidentiality, authenticity and integrity of Personal Data in Ellucian's possession.

Ellucian utilizes a combination of online and offline security technologies, procedures and organizational measures to help safeguard Personal Data. Ellucian also protects information through the use of firewalls, role-based restrictions, and encryption technology where appropriate. Ellucian limits access to Personal Data to Ellucian's employees and agents that have a specific business reason for accessing such Personal Data. Individuals who have been granted access to Personal Data are made aware of their responsibilities to protect such information.

How Long Do We Keep Personal Data?

Ellucian retains Personal Data from Applicants who do not become employees for 1 year for applicants in Ireland, the Netherlands and the United Kingdom, and for 3 years for Applicants in all other countries. If you subscribe to job updates or tell anyone at Ellucian that you are interested in additional future job opportunities, Ellucian may retain your Personal Data for longer.

Your Rights

Applicants can make certain changes and corrections to their own Personal Data through the applicant portal. Upon reasonable request and in accordance with applicable local law, Ellucian will grant Applicants reasonable access to their Personal Data and will permit them to correct, amend or delete Personal Data that is inaccurate or incomplete. Applicants who wish to exercise any other right described in this section can do so by contacting the recruiting team or the Data Protection Officer. For security purposes, Ellucian may require verification of the requester's identity before providing access to Personal Data.

¹ We may disclose your Personal Data to required third-parties in connection with a sale or transfer of our business or assets (including in the event of a reorganization, dissolution or liquidation).

Additional Terms for Applicants in the EEA or UK

These terms apply for Applicants who are located in the European Economic Area (“EEA”) or the United Kingdom (“UK”). Ellucian is the data controller of your Personal Data. Personal Data is processed by Ellucian either for the purposes of performing a contract with the data subject (you), compliance with legal obligations, or other legitimate interests of Ellucian.

Certain types of Personal Data called “Special Categories of Personal Data” receive additional protection. Special Categories of Personal Data are defined as Personal Data that reveals any of the following information relating to an individual: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data (for example, fingerprints or facial images when used as technical means to allow the unique identification of an individual); health data; data concerning sex life or sexual orientation and any Personal Data relating to criminal convictions or offences. We do not collect, use or otherwise Process Special Categories of your Personal Data, except where: (i) we are required or permitted to do so by applicable law; or (ii) we have, in accordance with applicable law, obtained your explicit consent to Process such Personal Data.

Due to the global nature of Ellucian, if you are located inside the EEA or the UK, we may also disclose or transfer your Personal Data to countries outside of the EEA and the UK as described in this Applicant Privacy Policy. If we do so, we will ensure that your Personal Data is afforded an adequate level of protection. If you would like more information on this including the method of transfer, please contact the Data Protection Officer at privacy@ellucian.com.

You may have certain rights with respect to our Processing of your Personal Data, which may include the right to: (a) access, modify, correct, update, delete, block, port, cancel, or object to the use of, your Personal Data held by Ellucian; and (b) request information about the way in which your Personal Data is Processed by Ellucian. There may be instances where providing Personal Data is optional, in which case you have a choice whether to provide your Personal Data for that optional purpose.

You may have the right to object to Processing of your Personal Data in certain instances where Ellucian is Processing the Personal Data for its own legitimate interests and there is not a compelling ground to continue Processing and the Processing is not necessary in connection with Ellucian’s legal rights. Please contact our Data Protection Officer (details above) if you wish to exercise this right.

If you have any queries about this Applicant Privacy Policy, please do not hesitate to contact our Data Protection Officer at privacy@ellucian.com. If you wish, you may also contact your local Data Protection Authority in respect of any complaints you may have. Any Applicant in the EEA or the UK who is not satisfied with the internal resolution of a complaint may seek redress with the national data protection or labor authority in the country where the Applicant resides. In the event you choose to file a complaint with a national data protection authority, Ellucian will cooperate with investigations by, and comply with the advice and decisions of, competent EEA or UK authorities.

Compliance and Enforcement

Any employee who violates this Applicant Privacy Policy will be subject to disciplinary action up to and including termination of employment. Any Applicant who has a complaint concerning Ellucian’s Processing of Personal Data should contact Ellucian’s Data Protection Officer at privacy@ellucian.com or AlertLine (<https://ellucian.alertline.com> or +1-855-226-5549). Ellucian will investigate and attempt to resolve such complaints in accordance with the principles contained in this Applicant Privacy Policy.

Changes to this Applicant Privacy Policy

Ellucian may update and amend this Applicant Privacy Policy from time to time and in accordance with applicable laws. A copy of this Applicant Privacy Policy is available upon request by emailing privacy@ellucian.com.

Effective Date: August 13, 2020