

# **UWF – HUMAN RESOURCES**

## **EU General Data Protection Regulation Privacy Notice**

This is the University of West Florida's (UWF) Human Resources' privacy and legal notice for compliance with the European Union General Data Protection Regulation ("EU GDPR"). For more information regarding the EU GDPR, please review: <https://gdpr.eu/>, UWF's EU GDPR Privacy Notice at <https://uwf.edu/media/university-of-west-florida/offices/general-counsel/pdf/UWF-EU-GDPR-Privacy-Notice.pdf> and <https://uwf.edu/go/legal-and-consumer-info/general-data-protection-regulation-gdpr/>

### **Lawful Basis for Collecting and Processing of Personal Data**

UWF is an institute of higher education involved in education, research, and community development. In order for UWF to process your information for employment with the university; provide information for payroll, benefits, retirement, workers' compensation, and medical leave, it must collect, use and process this personal data.

The lawful basis for the collection and processing of personal data by UWF's Human Resources falls under the following categories:

- Processing is necessary for the purposes of the legitimate interests pursued by UWF or third parties in providing employment, payroll, benefits, retirement, workers' compensation, and medical leave.
- Processing is necessary for compliance with a legal obligation in the European Union to which UWF is subject.
- The data subject has given consent to the processing of his or her special categories of sensitive personal data for one or more specific purposes.

### **Types of Personal Data collected and why**

In order for UWF Human Resources to provide and process employee and employment transactions including payroll, benefits, retirement, workers' compensation, and medical leave, it needs to collect the following categories of personal data:

- Name
- Contact information including, without limitation, email address, physical address, phone number, and other location data
- Unique personal identifiers and biographical information (e.g. date of birth)
- Details of your education and/or employment qualifications
- Medical information including, without limitation, diagnosis
- Information related to visa requirements, copies of passports and other documents to ensure compliance with U.S. laws
- Information related to the prevention and detection of crime and the safety of employees, students and visitors of UWF

The personal data collected by UWF's Human Resources will be shared as follows:

<b>UWF Unit</b>	<b>Purpose</b>
Controller's Office	Payroll

<b>Third-Party Name</b>	<b>Purpose</b>
HireRight	Background Screening
PeopleAdmin	Employment Application
Fragomen	Employment of Foreign Nationals
Florida Retirement System (FRS)	Retirement
PeopleFirst	Benefits (insurance, etc.)
State of Florida and AmeriSys	Worker's Compensation
AFSCME	Certified Bargaining Purposes
PBA	Certified Bargaining Purposes
UFF	Certified Bargaining Purposes

If you have specific questions regarding the collection and use of your personal data, please contact Matthew Packard, UWF Data Protection Officer, Office of Compliance and Ethics at [eugdpr@uwf.edu](mailto:eugdpr@uwf.edu)

If a data subject refuses to provide personal data that is required by UWF in connection with one of UWF's lawful bases to collect such personal data, such refusal may make it impossible for UWF to provide education, employment, research or other requested services.

### **Where UWF gets Personal Data and Special Categories of Sensitive Personal Data**

UWF receives personal data and special categories of sensitive personal data from multiple sources. Most often, UWF gets this data directly from the data subject or under the direction of the data subject who has provided it to a third party (for example, application for undergraduate admission to UWF through use of the Common App).

### **Individual Rights of the Data Subject under the EU GDPR**

Individual data subjects covered by the EU GDPR will be afforded the following rights at UWF:

- a) information about the controller collecting the data
- b) the data protection officer contact information
- c) the purposes and legal basis/legitimate interests of the data collection/processing
- d) recipients of the personal data
- e) if UWF intends to transfer personal data to another country or international organization
- f) the period the personal data will be stored
- g) the existence of the right to access, rectify incorrect data or erase personal data, restrict or object to processing, and the right to data portability

- h) the existence of the right to withdraw consent at any time
- i) the right to lodge a complaint with a supervisory authority (established in the EU)
- j) why the personal data are required, and possible consequences of the failure to provide the data
- k) the existence of automated decision-making, including profiling
- l) if the collected data are going to be further processed for a purpose other than that for which it was collected

**Note: Exercising of these rights is a guarantee to be afforded a process and not the guarantee of an outcome.**

Any data subject who wishes to exercise any of the above-mentioned rights may do so by filling such request with Matthew Packard, UWF Data Protection Officer, Office of Compliance and Ethics at [eugdpr@uwf.edu](mailto:eugdpr@uwf.edu)

## **Cookies**

Cookies are files that many websites transfer to users' web browsers to enable the site to deliver personalized services or to provide persistent authentication. The information contained in a cookie typically includes information collected automatically by the web server and/or information provided voluntarily by the user. Our website uses persistent cookies in conjunction with a third party technology partner to analyze search engine usage and web traffic patterns. This information is used in the aggregate to monitor and enhance our web pages. It is not used to track the usage patterns of individual users.

## **Security of Personal Data subject to the EU GDPR**

All personal data and special categories of sensitive personal data collected or processed by UWF must comply with the security controls, systems and process requirements and standards of UWF Policy IT-04.01-03, University of West Florida Information Security and Privacy Policy.

## **Florida Public Records Law**

As a state university, UWF is subject to the provisions of the Florida Public Records Law, as outlined in Chapter 119, Florida Statutes. Except those records that are exempt from disclosure under the Florida Public Records Law, the law provides that all citizens are entitled to view the records of state agencies on request and to make copies for a fee. For more information on UWF's obligations under the Florida Public Records Law, please see UWF Policy GC-01.04-05/18.

## **Data Retention**

Please be informed that:

1. The period for which your personal data will be stored will be from now until no longer needed for compliance with U.S and Florida laws.
2. You can withdraw your consent, if granted, at any time and even only orally, but this will not affect the lawfulness of processing your personal data based on your consent before withdrawal.
3. You have legal rights and remedies against any breach of your personal privacy according to articles 77 to 84 of the EU GDPR.

UWF keeps the data it collects for the time periods specified in UWF Policy FIN 03.02-02.14, Records Management, as required under Florida Law.

**\*\*\*DISCLAIMER:** The University of West Florida's (UWF) Human Resources may make amendments to this notice from time to time without prior notice by posting the revised notice to this site. The most recent version will be the most recent date in the *History* provided below.

*History: November 21, 2018; September 5, 2018.*