

## 1. Introduction

The Higher Education Data Governance (HEDGe) group is committed to protecting the privacy of our members' personal data and to adhering to current data privacy laws. Additionally, we recognize the needs of HEDGe leadership to manage and potentially utilize membership data for the purposes of supporting the vision and goals of HEDGe.

## 2. Changes to Data Usage and Privacy Policy

HEDGe reserves the right to modify this policy at any time so that it remains in accordance with current data privacy laws; and supports our membership's needs and growth. The HEDGe Data Usage and Privacy Policy (i.e., this document) will be reviewed annually by the Steering Committee's Membership group and associated support team members. The "Last Updated" date is listed at the top of this document.

## 3. What Data Are Collected?

We collect the following data from members: first name; last name; work email, institution, phone number, and office address (including city, state and country); business title and office. Additionally, we utilize the Carnegie Classifications to provide information on geographic location and type of institutions so that we may better understand who comprises our membership.

## 4. Data Storage

Membership data are collected via and stored on Airtable; and managed and updated by the Steering Committee's Membership group. Steering Committee members have access to membership data but are unable to modify the data. For a description of Airtable security, please see <https://support.airtable.com/hc/en-us/articles/203466199-Airtable-security-practices>

## 5. Data Access & Usage

Access to the Airtable database data is limited to HEDGe's Steering Committee members. This allows, for example, the appropriate Steering Committee members to set up membership communications tools (e.g., Slack), send out email communications to membership, and to cull aggregate data on membership for, for example, external presentations, potential funding streams, or providing membership with a broad overview of membership demographics. We will never publish the details of our membership list. Furthermore,

- HEDGe will never provide third-party vendors with any individual members' information from the HEDGe membership database nor will third-party vendors be provided with membership emails for the purposes of solicitation.
- Requests made by current HEDGe members about individual HEDGe members (e.g., members seeking fellow members at their institutions or members from their state or area) will be regulated by an opt-in mechanism. Details of our opt-in policy will be detailed on the HEDGe membership form, so that interested parties may determine how they would like HEDGe to manage their information in regards to other HEDGe

members. HEDGe members have the right to change their opt-in status at any time and should reach out to the Membership Group to have their choice updated.

- A HEDGe member may not give another member's contact information to another member or third party without first asking the member whose information is being sought.

## **6. Personal Data from Members Living in the EU or Switzerland**

The GDPR can, in many cases, apply to U.S. higher education institutions if those institutions control or process data about residents of the European Union. GDPR imposes a variety of data privacy and data security requirements that organizations must follow:

- Data Security Practices
- Personal data usage and privacy restrictions
- Data Breach reporting requirements
- Personal data consent

The personal reference must refer to a natural person. The protection does not apply to legal entities such as corporations, foundations, or institutions.

It is not clear yet, how the European Union will enforce the GDPR's regulations on U.S. Institutions.

While GDPR does not currently apply to HEDGe, we support GDPR and its aims in securing personal data privacy and security. If we find that GDPR does apply to HEDGe in the future, we will continue to support the spirit and requirements of GDPR and update this policy accordingly.

## **7. Your California Privacy Rights**

The California Consumer Privacy Act covers for-profit entities that:

- Have gross revenues exceeding \$25 million per year, or
- Buy, receive, sell or share personal information of 50,000 or more consumers, households or devices per year, or
- Derive at least half of annual revenue from the sale of personal information.

While HEDGe is not a for-profit entity and does not meet any of the above criteria, the California Consumer Privacy Act does not apply. Still, HEDGe is committed to securing individual data privacy and security and, as such, the California Consumer Privacy Act.