

CollegeNET GDPR Information

The European Union's General Data Protection Regulation ("GDPR") took effect on May 25, 2018. The GDPR replaces Europe's Data Protection Directive 95/46/EC and was designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens data privacy, and to reshape the way organizations across the region approach data privacy. The GDPR applies to all companies (like CollegeNet) processing and holding the personal data of subjects residing in the EU, regardless of the company's location.

This document lists the May 2018 changes and CollegeNET's compliance information.

Change: Stronger Consent Guidelines

Plan: For most users - those from non-EU member countries or EU residents over the age of 16, CollegeNET has a new consent agreement that is shown to users when they are: (1) creating an account; or (2) logging into an existing account for the first time after the GDPR takes effect. All users of myCoalition will need to agree to the new consent agreement to access the system after May 25, 2018.

For EU Residents between the ages of 13 - 16, parental consent must be received before any personal information can be collected. CollegeNET already prevents users under age 13 from creating a myCoalition account.

For any user between 13 and 16 years of age, we will ask for the user's country of residence. If the user is from an EU member state covered by the GDPR, we will collect only the parent's name and contact information from the user. CollegeNET will contact the parent via email with a link to a form they must complete and return to CollegeNET.

Change: Breach Notification

Plan: CollegeNET already has a breach notification procedure, and complies with all applicable laws. In the unlikely case of a breach, CollegeNET will comply with the applicable guidelines under the GDPR.

Change: Right to Access

Plan: CollegeNET will initially only support this right for residents of EU member states covered by the GDPR. If demand materializes, we will consider making this a feature of our Account system. Users will need to contact CollegeNET (admin@mycoalition.org) to receive a report.

Change: Right to be Forgotten

Plan: CollegeNET already permits a user to delete their Account, which removes their information from MyCoalition. In the case a resident of an EU member state requests to be forgotten, it may be the responsibility of CollegeNET to notify other controllers of the request. For these requests, CollegeNET will notify the college(s) that have received the record from us. Notifications will be sent via email from CollegeNET to the Coalition's primary contact.

Further, CollegeNET will also anonymize the record and mark it as a GRPR Right to Be Forgotten request using a new data dictionary field. The record will remain anonymized in MyCoalition, batching tables, and PDFs, so if the college(s) later re-downloads the record, any personal information will be redacted.

Change: Data Portability

Plan: CollegeNET will initially only support this right for residents of EU member states covered by the GDPR. If demand materializes, we will consider making this a feature of our Account system. Users will need to contact CollegeNET (admin@mycoalition.org) to receive a copy of their data. Upon verification of their identity, data will be provided in csv format in name value pairs.

Change: Privacy by Design

Plan: Because of our long history in protecting student data as well as our PCI-DSS and SOC2 compliance, CollegeNET already factors data privacy into its development efforts. We will continue to follow best practices in this area.