

City University of Hong Kong
European Union General Data Protection Regulation (“GDPR”)
Privacy Notice

*(supplement to the Personal Information Collection Statements for
[Programme Applicants](#) and [Students](#), where applicable)*

The City University of Hong Kong ("University") takes the privacy and protection of your personal data seriously and is committed to processing your personal data in accordance with its responsibilities under the General Data Protection Regulation (Regulation EU 2016/679, the “GDPR”) of the European Union.

The GDPR is a regulation on data protection and privacy in the European Union (EU) and the European Economic Area (EEA). The regulation contains provisions and requirements related to the processing of personal data of individuals who are located in the EEA, and applies to any enterprise—regardless of its location and the data subjects' citizenship or residence—that is processing the personal data of data subjects inside the EEA.

This Privacy Notice explains how the University collects, uses and processes your personal data and your rights regarding your personal data.

1. Data Controller

For the purposes of this privacy notice, City University of Hong Kong, is the Data Controller of your personal data as defined in the GDPR. The Data Protection Officer is Mr Sunny Lee, Data Protection Officer and Vice-President (Administration). Address: Tat Chee Avenue, Kowloon, Hong Kong. Tel: +852 3442 7466. Email: data.protection@cityu.edu.hk.

The University takes information security seriously and has implemented appropriate technical and organizational measures to protect personal data and special categories of personal data from unauthorised access, disclosure and destruction. Access to personal data is restricted on a need-to-know basis and the security arrangements are regularly reviewed to ensure their continued suitability.

2. Personal Data We Collect

We collect most of your personal data directly from you through the admission application process when you apply for and the pre-enrollment process when you enroll in an academic programme as well as during your studies at the University, and indirectly from partner institutions under collaboration arrangements. We may also collect additional information from third parties such as parents of students under the age of 18, student’s former schools and higher education institutions, examination bodies, professional bodies/associations, external referees, agents/agencies, and government departments.

- The personal data collected by the University will include, but not limited to, the following:
- a. your contact details and other information, including your HKID card/passport/travel document number, submitted during the application and enrolment process, during your study at the University and at graduation;
 - b. contact details of your next of kin to be used in case of emergency;
 - c. medical and dental information (where applicable) including information about any disabilities or health conditions you have;
 - d. details of your modules, courses, timetables, assessment marks and examination results, student conduct-related records (if any) and any qualifications you are awarded;
 - e. information about previous qualifications;
 - f. any communications you have with us, and any communications we generate about you;
 - g. financial and personal data collected for the purposes of administering fees and charges, loans, grants, scholarships and hardship funds, and if applicable to assess student eligibility to obtain a visa to study with us;
 - h. photographs, video recordings and other materials for the purposes of consideration for admission;
 - i. information related to the prevention of and detection of crime and the safety and security of staff and students, which includes, but not limited to, CCTV recordings and data relating to breaches of the University's regulations;
 - j. details of your engagement with the University such as attendance information and record of the use of other services such as student accommodation;
 - k. copies of HKID cards, passports, travel documents and any identification data in compliance with right to study and identification requirements;
 - l. where applicable, this will also include details of visas and any other documents required for compliance with Immigration Department requirements, as well as biometric data for attendance purposes;
 - m. special categories of personal data including disability data and special educational needs such as physical and sensory disability, developmental and learning disability, intellectual disability, mental illness and visceral disability;
 - n. information you have directly provided for other services the University provides, such as student support and career service; and
 - o. data about you that we have to collect by law (for example where Hong Kong immigration law requires us to record information about you, or to report it to the immigration authorities).

3. Purposes and Use of the Data Processing

The University collects your personal data and special categories of personal data to process your application to the University, as well as for different processes and procedures during your studies for purposes including:

- a. for admission application purposes including, but not limited to:-
 - i. as a basis for various types of processing in relation to your application;
 - ii. as a basis for the selection of applicants for admission to the programmes offered by the University and/or in collaboration with other institutions; for other opportunities relating to funding schemes/awards by the University or other parties; and for other relevant or related purposes;
 - iii. to obtain, from the relevant examination authority, assessment body or academic institution in Hong Kong and elsewhere, information about your examination results, records of studies or professional qualifications if deemed appropriate;
 - iv. to carry out checks on your applications, and any records of studies at the University and other institutions in Hong Kong and elsewhere if deemed appropriate;
 - v. to carry out checks on other information mentioned in your application (e.g. employment records, non-academic awards and professional qualifications) with the relevant parties if deemed appropriate;
 - vi. to transfer relevant data to the student record system of the University, and partner institutions under collaboration arrangements and/or other parties supporting financial schemes/awards, if applicable upon your successful enrolment at the University; and
 - vii. for statistical and research purposes (with personal identifiers removed);
- b. for education and training administration purposes including, but not limited to:-
 - i. admission, registration, enrolment and monitoring of students;
 - ii. enabling management, planning and provision of facilities, services and benefits to students, including without limited to accounting for fees, administering student-related benefits and welfare and interacting with University's recognised student associations;
 - iii. assessment of students, evaluating academic performance, administering training, planning and control of curricula and assessment, calculation and publication of assessment results, credit transfer, course exemption, graduation and congregation;
 - iv. commissioning and validating educational materials;
 - v. enabling communication with students (whether enrolled at, studying at, graduated from or left the University) and University promotional/public relation activities;
 - vi. provision of references (such as academic references and other related comments on students) and verification of student/graduate status;
 - vii. enabling the University to carry out academic governance, make tax returns and statutory and/or regulatory filings or submissions;
 - viii. arrangement of student activities (such as exchanges and field trips);

- ix. provision of career development services (such as internships and job placements);
 - x. conducting quality assurance, academic planning and professional accreditation;
 - xi. communication with students and/or students' emergency contact person/ parents/guardians in relation to the application, students' study, health or medical condition and/or financial circumstances, and release of students' information at the University under emergency situations as determined by the University; and
 - xii. carrying out research, analysis, surveys, and reviews on students (whether enrolled at, studying at, graduated from or left the University) by the University or a third party engaged by the University;
- c. for managing alumni affairs including, but not limited to:-
- i. setting up alumni systems;
 - ii. maintaining contact and communication with you;
 - iii. enabling management, planning and provision of facilities, services and benefits to you;
 - iv. organising alumni events and activities, etc.; and
 - v. interacting with University's recognised alumni associations;
- d. for carrying out investigations and taking disciplinary action under the University's disciplinary procedures and Revised Code of Student Conduct and Disciplinary Procedure (the "Code"). The University may use or disclose such information and personal data it considers appropriate (including those giving rise to, arising from or connected with, action taken under the disciplinary procedures) for the following purposes:-
- i. to maintain student records (including without limited to, academic honesty and disciplinary record);
 - ii. for historical and statistical analysis;
 - iii. to report an investigation under the Code and any relevant details thereof (including without limitation, the status, the steps taken and to be taken, whether the complaint is substantiated, the rationale behind any decision as well as any disciplinary action taken and to be taken against the student concerned) to the complainant or any other third party (whether within or outside of the University) as the University considers appropriate;
 - iv. to discuss with students' immediate family members or guardians;
 - v. to disclose to any third party (whether within or outside of the University) the University considers appropriate to protect its interest, reputation and/or respond to adverse publicity against the University or media enquiries;
 - vi. to respond to any requests for information made by internal bodies of the University (e.g. the Council, the Court, the Senate, the Convocation, the Management Board, any Principal Officer of the University, any faculty, college, school, department, division, office, committee, board, unit or any equivalent body established under the City University of Hong Kong Ordinance and Statutes made pursuant to that Ordinance), government department or authority or any other third party that the University considers should be informed;

- vii. to enable agents and third party service providers of the University to provide services to the University (e.g. to provide legal advice and other professional services); and
 - viii. to use and disclose such information and personal data for any other legitimate reason or purpose the University considers appropriate;
- e. for the University to obtain and maintain any licence, permit, approval or authorization;
 - f. for the University's compliance with the applicable procedures, laws, regulations or court order (in each case, whether local or overseas), any requests by any government, statutory, regulatory or law enforcement authority or valid legal process or discovery obligations and pursuing available remedies or limiting the damages that it may sustain;
 - g. for the protection of the University's interests, rights, property and reputation; and
 - h. for any other purposes related to any of the above.
 - i. Direct Marketing – separate mechanism for applicants and students to select their options to or not to receive direct marketing communications from the University are available during the application and enrollment processes. They can also change their related option any time free of charge.

4. Legal Bases for Data Processing

The lawful bases for processing your personal data under the GDPR are:

- a. Contract performance: where your personal data is necessary to enter into or perform our contract with you.
- b. Legal and regulatory obligation: where we need to use your data to comply with our legal and regulatory obligations.
- c. Legitimate interest: where we use your personal data to achieve a legitimate interest and our reason(s) for using it outweigh any prejudice to your data protection rights.
- d. Vital interest: where we use your personal data to save someone's life, commonly seen in emergency medical care situations.
- e. Public interest: where we need to use your personal data for tasks carried out in the public interest or exercise of official authority vested in the data controller.
- f. Consent: where you have consented to our use of your personal data.

5. Parties that the Personal Data is Shared with

We will share your personal data with the following parties in connection with the purposes set out in paragraph 3 above:

- a. the relevant academic and student support units of the University;
- b. any subsidiary and affiliated companies of the University;
- c. any third party or agent situated in Hong Kong or overseas including employment agents, potential employers, the University's insurers, medical practices providing medical cover for students and other companies or entities engaged in activities on the University's behalf such as a service provider or data processing company;
- d. any government or law enforcement authority or agency, or in good faith to any other parties that the disclosure is necessary or advisable including and without limitation to protect the University's interests, rights, properties and reputation (e.g. the media); and
- e. external parties such as partner institutions under collaboration arrangements.
- f. International transfers - In some instances, we may need to share your personal data with other organisations based in the European Union (EU) or outside the EU, in order to fulfil our purposes. We will always take steps to ensure that any international transfer of information is carefully managed to protect your rights and interests and is undertaken in accordance with any rules governing such transfers.

6. Retention of the Personal Data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

Various processes within the University which make use of personal data have individual retention and disposal rules applied to them. These rules will be reviewed regularly by the respective offices to ensure that personal data is not kept longer than is necessary.

7. Rights Available to You under GDPR

The following rights are available to you under the GDPR and are subject to certain conditions and exceptions as set out in the regulation:

- a. The right to be informed
- b. The right of access
- c. The right to rectification
- d. The right to erasure
- e. The right to restrict processing
- f. The right to data portability
- g. The right to object
- h. Rights in relation to automated decision making and profiling

Please write to the University via data.protection@cityu.edu.hk if you wish to exercise these rights in relation to your personal data.

The University reserves the right, at any time without prior notice, to change and update this privacy notice. Enquiries about this policy and data privacy matters should be directed to the Office of the Data Protection Officer at: data.protection@cityu.edu.hk.

26 Nov 2020 [v.1.1]