Privacy & Legal Notice

Below is the GRSP privacy and legal notice for both its website and for compliance with the European Union General Data Protection Regulation (“EU GDPR”). The Administrative Office of GRSP is responsible for information related to the GRSP website and is responsible for compliance with the EU GDPR.

Website

What we collect and why

GRSP collects information from individuals or entities when they access the GRSP website. Information that is collected from this contact is the contactor’s IP address, date and time of the website access along with the web pages(s) visited. In addition, GRSP may also collect any information that it receives from your web browser, including browser type and version, and operating system. This information helps us understand aggregate uses of our site, track usage trends and improve our services.

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

Our program is committed to ensuring the security of your information. We have put in place reasonable physical, technical and administrative safeguards designed to prevent unauthorized access to or use of the information collected online.

Sharing your information

We will not share your information with third parties except:

\* as required by law;

\* as necessary to protect GRSP interests; and/or

\* with service providers acting on our behalf who have agreed to protect the confidentiality of the data.

Links to other websites

This site may contain links to other websites not affiliated with GRSP. We are not responsible for the privacy practices of these other sites. We encourage you to read the privacy statements of other sites for assurance that their practices safeguard your privacy.

Legal Notice

Notwithstanding any language to the contrary, nothing contained herein constitutes nor is intended to constitute an offer, inducement, promise, or contract of any kind. The data contained herein is for informational purposes only and is not represented to be error free. Any links to non-GRSP information are provided as a courtesy. They are not intended to nor do they constitute an endorsement by GRSP of the linked materials.

European Union General Data Protection Regulation (EU GDPR) Privacy Notice

Lawful Basis for Collecting and Processing of Personal Data

GRSP is a 501(c)3 charitable organization involved in providing cultural scholarships for study at an educational institution in Georgia and community service through the hosting Rotary clubs. In order for GRSP to offer its students cultural scholarships and engage community services, it is essential, necessary, and GRSP has lawful bases to collect, process, use, and maintain data of its scholarship applicants. The lawful bases include, without limitation, admission, registration, grades, communications, employment, program analysis for improvements, and records retention. Examples of data that GRSP may need to collect in connection with the lawful bases are: name, email address, IP address, physical address or other location identifier, photos, as well as some sensitive personal data obtained with prior consent.

For more information regarding the EU GDPR, please review GRSP EU GDPR Compliance Policy.

Most of GRSP collection and processing of personal data will fall under the following categories:

a) Processing is necessary for the purposes of the legitimate interests pursued by GRSP or third parties in the scholarship application process.

b) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. This lawful basis pertains primarily but not exclusively to the scholarship contract.

c) Processing is necessary for compliance with a legal obligation to which GRSP is subject. This lawful basis pertains primarily but not exclusively to compliance with state and federal laws. Examples are providing participation data as required by the US Internal Revenue Service.

There will be some instances where the collection and processing of personal data will be pursuant to other lawful bases.

Types of Personal Data collected and why

GRSP collects a variety of personal and sensitive data to meet one of its lawful bases, as referenced above. Most often the data is used for academic admissions, enrollment, educational programs, provision of medical services, development and community outreach. Data typically includes name, address, transcripts, work history, information for payroll, research subject information, medical and health information (for student health services, or travel), and donations. If you have specific questions regarding the collection and use of your personal data, please contact the GRSP Program Administrator.

If a data subject refuses to provide personal data that is required by GRSP in connection with one of GRSP lawful bases to collect such personal data, such refusal may make it impossible for GRSP to provide a cultural scholarship

Where GRSP gets Personal and Sensitive Personal Data

GRSP receives personal and sensitive personal data from multiple sources. Most often, GRSP gets this data directly from the data subject or under the direction of the data subject who has provided it to a third party.

Individual Rights of the Data Subject under the EU GDPR

Individual data subjects covered by [Institution Name] EU GDPR Compliance Policy rights:

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 GRSP 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 the GRSP Program Administrator.

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Security of Personal Data subject to the EU GDPR

All personal data and sensitive personal data collected or processed by GRSP under the scope of the GRSP EU GDPR Compliance Policy must comply with the security controls and systems and process requirements and standards of NIST Special Publication 800-171 as set forth in the [Institution Name] Unclassified Data Policy.

We will not share your information with third parties except:

\* as necessary to meet one of its lawful purposes, including but not limited to,

o its legitimate interest,

o contract compliance,

o pursuant to consent provided by you,

o as required by law;

\* as necessary to protect GRSP interests;

\* with service providers acting on our behalf who have agreed to protect the confidentiality of the data.

Data Retention

GRSP keeps the data it collects for the time periods specified in the GRSP Data Retention Policy.