

Privacy Policy for IDC Applicants and Students

The Inter Disciplinary Center Herzliya (“**IDC**”, “**we**”) is committed to handling personal data in a fair and transparent way. This Privacy Policy applies to current IDC students and applicants as IDC offers its student a variety of academic programs and services related to the students’ academic experience and assesses the eligibility of its applicants to be offered a place in one of IDC’s academic programs (“**services**”).

This Privacy Policy describes how IDC collects and processes information about IDC’s students and applicants (“**user**”, “**you**”) when such are using our website (the “**Website**”) and services. Other related websites, for example, those operated by divisions, faculties, departments or other units may carry their own privacy policy or provide additional information relating to their activities, which will supersede or supplement this Privacy Policy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- Your rights with regard to the collection of such information.

By using our Website and services, you agree to this Privacy Policy.

Collecting Information

Please note that the scope of this Privacy Policy is limited only to information collected by IDC through your use of its Website and services. Some information may be automatically collected, and some is collected when you interact with our Website or use our services. The type of information that may be automatically collected is non-personal information, collected on the Website, which includes your session durations, the content you accessed on the Website, the frequency and scope of your use of the Website and information about your computer and internet connection including the operating system you use and browser type.

Information from which you can be personally identified may also be collected (“**Personal Information**”). We collect and use such Personal Information for a range of different purposes according to different legal bases of processing. We will elaborate on the types of Personal Information we collect when you use our Website or services as well as the legal basis which supports our collection and use of your Personal Information.

The Type of Personal Information Collected

As you are an IDC student or an Applicant, we may, among other information, collect the following:

- **Biographical Information**: such as name, birth date, age, gender, nationality.
- **Contact Details**: such as contact address, email address, telephone number.
- **Administrative**: such as enquiry records, application records, student number, photo and ID number.
- **Compliance Documents**: such as copies of passports, visas and any other documents required to approve your legal status, health and safety records (assessments, accident reports).
- **Financial Information**: such as banking details, records of payments, applications for funding and loans, debts to IDC and appropriate information and documentation required to charge fees or to assess the eligibility to receive loans, grants, scholarships and hardship funds, for example family or personal circumstances, financial information, relevant documentation and supporting evidence.
- **Historical Information**: such as your educational and employment history (places attended or worked), courses you have completed, dates of study and examination results.
- **Sensitive Personal Information**: such as racial or ethnic origin, religious or similar beliefs, sexual orientation (processed for statutory returns or relevant student support services), health information relating to the provision of advice, support and welfare offered by IDC, including

counselling notes, health information to facilitate reasonable adjustments or health information for sports membership etc.

- Academic Assessments Records: such as timetables, attendance records, details of examinations taken, personal extenuating circumstances, appeals, complaints, awards etc.
- Disciplinary Information: such as records of any breaches of IDC's policies and regulations, investigations, witness statements, evidence and actions taken.
- Emergency Contacts: information on the person of whom you wish us to contact in case of an emergency.
- Security Information: such as security camera images and IDC's system login data.

The Purposes for which your Personal Information is processed

1. Performance of a contract with you

If you are an IDC applicant, your Personal Information is required for the following activities, which are necessary for the performance of our contract with you or in order to take steps prior to entering into a contract that will formulate your status as an IDC student.

We will process your Personal Information to:

- Register and respond to your enquiries, keep you informed about relevant subjects that you have expressed an interest in and to invite you to IDC events.
- Evaluate your residential status to consider your dormitory application.
- Receive, administer and assess your application including inviting you to assessment and orientation days and for consideration of your "good standing" for professional programs.
- Correspond with you in relation to your enquiries or application about any relevant associated events or services e.g. open days, student support, accommodation etc.
- Management and administration of your application and registration.

Upon enrolling to become an IDC student, we will process your Personal Information for the performance of a contract with you according to IDC will provide you IDC's academic services.

In order to do that we will process your Personal Information for the purpose of:

- Academic administration, including registration, tuition payments, provision of study materials, timetabling, academic progress, facilitating professional placements, organizing examinations and the production of transcripts and certificates.
- Administration of policies including appeals, complaints, disciplinary and misconduct.
- For the provision of IT services, including your IDC account, email services and registration with third party systems.
- Providing access to, and managing your use of IDC's facilities and services such as library membership, access to library systems, car parking, sports facilities etc.
- Monitoring your engagement with learning and teaching activities and systems related to your studies (attendance, virtual learning environment usage etc.).
- Direct mailing in relation to activities related to your studies, including: student benefits and opportunities offered by or through us, activities and events organized in relation to your studies and providing operational information (e.g. IT support, information about building closures etc.).

2. IDC's legitimate interest

Whether you are an applicant or an IDC student, we also need to process your data in light of our legitimate interests or the legitimate interests of others in providing specific services, improving it and keeping it secure. Examples include, but are not limited to, the following:

Providing you with information that you may find an interest in:

- We will send you direct mailing relating to benefits and opportunities offered by or through us.

- We will send you information regarding IDC's activities and events organized for students or applicants in relation to future opportunities.
- We will send you information on non-study or associated material we think might be of interest to you, for example information on the Students' Board.

Improving and developing IDC's services and Website:

- Improve and develop our services and understand feedback on IDC's Website and to help provide you with more information on IDC.
- Conduct an ongoing review and improvement of the information provided on our Website to ensure it is user friendly.
- Improve the management and administration of IDC and maintain compliancy with our internal policies and procedures.
- Conduct surveys and research, test features in development, and analyze the information we have to evaluate and improve our Website and services.

Maintain a secured environment:

- Verify and authenticate your identity and prevent unauthorized or illegal activity.
- Enhance the safety and security of our Website and IDC facilities.
- Conduct security investigations and risk assessments.
- Prevent or take action against activities that are, or may be, in breach of our Terms of Use or applicable law.

3. Where We Have Your Consent

There may be situations where we ask for your consent to process your data e.g. where we ask you to volunteer information about yourself by taking part in a survey, or where we ask for your permission to share sensitive information.

4. Comply with Applicable Laws

We may process your information if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary for IDC to comply with a legal obligation and any applicable law. This may include:

- Meeting any applicable law, regulation, legal process, or governmental request.
- Enforcing our Terms of Use, including investigation of potential violations.
- Detecting, preventing, or otherwise addressing fraud, security, or technical issues.
- Protecting against harm to the rights, property or safety of IDC, our users, or the public as required or permitted by any applicable law.

Disclosure of Information and Transfer of Data

Except as otherwise provided in this Privacy Policy, we reasonably attempt to ensure that we never intentionally disclose any of your Personal Information, to any third party without having received your permission, except as provided for herein or otherwise as permitted or required under law.

In order to perform our contractual and other legal responsibilities or purposes, we may, from time to time, need to share your Personal Information with third parties. We may as well share your Personal Information with our affiliates, subsidiaries or any third-party service providers and individuals to facilitate our services or any portion thereof, such as marketing, data management or maintenance services. In particular, pursuant to the Protection of Privacy Regulations (Conditions of Holding and Storing Data and Procedures for Transferring Data Among Public Entities) - 1986, IDC shares your information with the Council of Higher Education pursuant to its vested authorities and as provided by law.

We may also share your information with analytics service providers for analytics services. Such analytics service providers set their own cookies or other identifiers on your computer, through which

they can collect information about your usage of our Website. This helps us compile aggregated statistics about the effectiveness of our Website and services.

The above mentioned third parties may be located in countries other than your own, and we may send them information we receive. When such third-party service providers process your Personal Information on our behalf, we will assure that they comply with obligations similar to those which are set forth in this Privacy Policy. We will also assure that they will abide by our data privacy and security requirements and will be allowed to use the Personal Information solely for the purposes we set. We will transfer your Personal Information while using appropriate and suitable safeguards, while using a variety of legal mechanisms, including contracts, to ensure your rights and protections travel with your data.

We may also transfer your information, including Personal Information, in connection with a corporate merger, consolidation, the sale of related assets or corporate division or other fundamental corporate changes. Furthermore, information about you may also be released in order to comply with any valid legal obligation or inquiry or process such as a search warrant, subpoena, statute or court order. We will also release specific information in special cases, such as if you use the Website to perform an unlawful act or omission or take any act or omission that may damage IDC, its property and goodwill, or if there is an attempted breach of the security of the Website or a physical or property threat to you or others. The authority supervising such activities is the Israeli Privacy Protection Authority, and you have the right to file a complaint to it or any other relevant supervisory authority.

Your Rights

You have the right at any time to request to access and modify your information. To exercise these options, please contact us at idc-dpo@idc.ac.il.

In some jurisdictions, in particular those located within the European Union (the "EU") or within the European Economic Area (the "EEA"), you may be afforded specific rights regarding your Personal Information. Subject to such eligibility, you may have the following rights to:

1. Request a rectification of your Personal Information where the information we hold about you is incorrect or incomplete.
2. Object to the processing of your Personal Information for direct marketing purposes.
3. Object to the processing of your Personal Information where our legal basis for that processing is that such processing is necessary for our legitimate interests.
4. Object to an automated decision-making (including profiling) in certain circumstances.
5. Request the erasure of your Personal Information in certain circumstances, such as where processing is no longer necessary for the purpose it was originally collected for, and there is no compelling reason for us to continue to process or store it;
6. Receive your Personal Information or ask us to transfer it to another organization that you have provided to us, which we process by automated means, where our processing is either based on your consent or is necessary for the performance of a contract with you.

Generally, with regard to information collected on our Website and through our Services, IDC is a "Data Controller". Therefore, if you wish to exercise the above-mentioned rights, please contact us, and we will make our best efforts to fulfill your request.

If you wish to file a request regarding any of the above, you may contact us at: idc-dpo@idc.ac.il.

Cookies

We may use "cookies" and/or other technologies or files (collectively, "cookies") to identify how visitors make use of this Website. This aggregated tracking information may be used to help us improve and enhance the Website experience for all of our visitors. In addition, cookies are used for adjusting the Website to your personal preferences. Cookies contain information such as the pages you visited, the length of time you stayed on the Website, the location from which you accessed the Website and more. If you would prefer not to have cookies stored on your computer, you may modify your browser settings to reject most cookies, or manually remove cookies that have been placed on your computer. However, by rejecting the cookies, you may be unable to fully access the offerings on this Website. To find out more about cookies, visit www.allaboutcookies.org.

Opt In or Opt Out

You are always in control of your data, and if you choose to receive information from us, you can change your mind later. If, at any time, you would like to stop receiving such information or opt out of a feature, you may notify us by writing to idc-dpo@idc.ac.il. You should be aware, however, that it is not always possible to completely remove or modify information in our databases and servers, although we will always make reasonable efforts to do so upon your request.

Links to Other Websites

This Website may provide links to other websites. Please be aware that these other websites are not covered by our Privacy Policy. This Privacy Policy does not cover the information practices exercised by other providers of products or services, advertisers or other websites, companies or individuals, which are not owned or controlled by IDC. We suggest that when linking to another website, you always read that website's privacy policy before volunteering any personally identifiable information.

Data Security

We deploy industry standard, or better measures to ensure the security, confidentiality, integrity and availability of personal data we process. We maintain physical, technical and administrative safeguards, and test and update these periodically. We endeavor to restrict access to Personal Information on a 'need to know' basis for the provision of services to you. In the event of a security breach, we will take all reasonable action to minimize any harm. Although we will do our best to protect Personal Information, we cannot guarantee the security of data transmitted to our site or to group companies, and transmission is at the user's own risk.

Data Retention

Generally, IDC does not retain information longer than necessary to provide its services and for its reasonable business and lawful needs. If you withdraw your consent to us processing your data, we will erase your Personal Information from our systems, unless the data is required for IDC to establish, exercise or defend against legal claims or it is necessary for the performance of the requested services.

Children's Privacy

The service is not intended for children under the age of 16. We do not, knowingly or intentionally, collect information about children who are under 16 years of age.

IF YOU ARE UNDER THE AGE OF 16 YOU MAY NOT USE THE SERVICE, UNLESS PARENTAL CONSENT IS PROVIDED ACCORDINGLY

Questions Regarding Our Privacy Policy

If you have any questions regarding this Privacy Policy or the practices described above, you are always welcome to contact us at idc-dpo@idc.ac.il.

Revisions and Modifications to our Privacy Policy

We reserve the right to revise, amend, or modify this Privacy Policy at any time. When changing the policy, we will update this posting accordingly. Please review this Privacy Policy often so that you will remain updated regarding our current policies.

Governing Law and Jurisdiction

This Privacy Policy will be governed and interpreted pursuant to the laws of the State of Israel without giving effect to its choice of law rules. You expressly agree that the exclusive jurisdiction for any claim or action arising out of or relating to this Privacy Policy shall be to the competent courts in Tel Aviv, Israel, to the exclusion of any other jurisdiction.

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