

The University of California  
Statement of Privacy Practices– General Data Protection Regulation  
UC SHIP

**1. Transparency Regarding the Use of Your Personal Data**

As part of our commitment to protecting your privacy, this statement is designed to provide you with information regarding how the University of California Student Health Insurance Plan (UC SHIP) collects and processes the information you share when you use our website located at [www.ucop.edu/ucship](http://www.ucop.edu/ucship) and each of its associated domains (together, the "Sites"), utilize the services of ours which include the provision of health insurance to UC's students, or when you otherwise communicate with UC SHIP ("UC SHIP Services"). This statement is applicable to individuals using UC SHIP Services who are located in the European Economic Area ("EEA").

For purposes of the General Data Protection Regulation ("GDPR"), the data controller is the Regents of the University of California, with a location at 1111 Franklin Street, 10<sup>th</sup> Floor, Oakland, CA 94607.

**2. Your Personal Data We Use**

**Information you provide directly to UC:** UC SHIP collects personal information about you called Personal Data. Your Personal Data is collected when you register for classes or fill in an enrollment form on the UC SHIP Services Sites, or contact UC SHIP. This includes information you provide when you register for enrollment at the University of California, voluntarily enroll in UC SHIP, or seek a waiver from enrollment in UC SHIP. If you enroll or are enrolled in UC SHIP, or seek a waiver to enroll in UC SHIP, the information you give us includes your name, address and telephone number and e-mail address, UC student identification number, and date of birth, as well as any information about you that is associated with or linked to, or could be linked to, any of the foregoing data. If you request a waiver to enroll in UC SHIP, the information you give us also includes your identification number associated with your health insurance, and the name of the subscriber of your health insurance.

**Information from Other Sources:** We also obtain information about you from other departments within UC and combine that information with information we collect from you directly. The information we obtain from other sources includes your UC student identification number as well as any information about you that is associated with or linked to, or could be linked to, any of the foregoing data.

The information you give or we collect also includes more sensitive information, such as information relating to a medical condition or a medical diagnosis, biometric information about you, or demographic information relating to you. This information is collected for purposes of preventive medicine, or to provide medical treatment to you pursuant to a contract with a health professional bound by ethical requirements to maintain the confidentiality of your information.

### 3. **How We Use Your Personal Data and the Lawful Basis for Such Processing**

UC SHIP processes your Personal Data for the following purposes and bases:

- Evaluating your request to waive enrollment into UC SHIP. This is generally required under the contract we have with you as a student.
- Enrolling you into UC SHIP. This is generally required under the contract we have with you as a student and UC SHIP enrollee.
- Administering your participation in UC SHIP. This is generally required under the contract we have with you as a UC SHIP enrollee.
- Assessing/appraising provision of student health insurance. It is in our legitimate interest as a health insurance provider to understand and improve our processes.
- Providing you with information regarding UC SHIP events and initiatives. We will generally only do this where it is in our legitimate interest and where you have not objected or withdrawn any prior consent given.
- Processing and dealing with any complaints or inquiries made by you or legally on your behalf. We do this because it is in our legitimate interest as part of the services UC SHIP offers to you.
- UC may also be required to disclose your Personal Data to authorities who can request this information by law that is binding on UC.
- Utilizing sensitive personal data in connection with our Services, with your consent.

In certain instances, UC SHIP may be required to obtain your consent to collect and process your Personal Data for a specific purpose. This depends on the specific category of data collected and the intended use of the data. In these instances, UC will inform you of the specific category of Personal Data that will be collected and the intended purpose of the collection, and will request that you affirmatively indicate that you consent to the intended collection of your Personal Data for that purpose, prior to collecting the data.

In these instances, if you do not consent to the collection and intended processing purpose, UC will refrain from collecting and processing your Personal Data.

### 4. **Recipients of Your Personal Data**

UC SHIP may share your Personal Data with the following recipients:

- **Other UC locations or departments:** Other UC locations or departments in order to provide you with a UC Service, including the registrar's office or financial aid, or where it is in UC's legitimate interests.
- **Service Providers:** Vendors that need access to your Personal Data in order to provide UC SHIP Services. These include vendors to evaluate requests for waiver of enrollment in UC SHIP, and claims administrators and UC SHIP insurance carriers and brokers who administer UC SHIP. Where UC SHIP analyzes your Personal Data in order for UC to improve its provision and administration of its Services, it will share your Personal Data with data analytics vendors, and where consent is required, will only do so with your consent.

If your Personal Data is shared with a third party, UC will require that the third party use appropriate measures to protect the confidentiality and security of your Personal Data.

We may also need to share your Personal Data as required to respond to lawful requests and legal process; to protect our rights and property and those of our agents, customers and

others, including to enforce our agreements and policies; and in an emergency, to protect UC and the safety of our students, faculty and staff or any third party.

## 5. **Security**

UC takes appropriate physical, administrative and technical measures to protect Personal Data that are consistent with applicable privacy and data security laws and regulations. For more information about how UC protects data, refer to [Systemwide Information Security Policies and Standards](#).

## 6. **Retaining and Deleting Your Personal Data**

UC will retain your Personal Data for seven years from the date of enrollment in UC SHIP, unless there is a legal requirement to maintain it for a longer period.

## 7. **International Transfer of Your Personal Data**

In order to fulfill the intended processing purposes described above, your Personal Data will be transferred outside of the European Economic Area (EEA), specifically to the United States, which does not protect Personal Data in the same way that it is protected in the EEA. UC will undertake appropriate measures to ensure adequate protection of Personal Data, including utilizing appropriate physical, administrative, and technical safeguards to protect Personal Data, as well as executing standard contractual clauses approved by the European Commission or a supervisory authority under GDPR, or obtaining your consent, where appropriate.

## 8. **Your Rights**

As required by the General Data Protection Regulation and applicable EU Member State and EEA state law, if you are located in the European Economic Area, you have a right to:

- **Access your Personal Data**, as well as information relating to the recipients of your Personal Data, the purposes of processing your Personal Data, the duration for which the Personal Data will be stored, and the source of Personal Data that has not been provided by you;
- **Rectify or correct inaccurate or incomplete Personal Data** concerning you, taking into account the purposes of the processing, and the right to have incomplete Personal Data completed;
- **Move your Personal Data** to another controller or processor. UC will facilitate the lawful transfer of your data to the extent possible;
- Have your **Personal Data erased** in certain circumstances;
- **Restrict the processing of your Personal Data** in certain circumstances;
- **Object** to the processing of Personal Data in certain circumstances;
- **Withdraw your consent to the processing of your Personal Data**, should UC ask for your consent for the processing of your Personal Data. The withdrawal does not affect the lawfulness of Processing based on your consent before its withdrawal.
- Know whether your Personal Data is being used for **automated decision-making, including profiling**. In those cases, UC will give you meaningful information about the logic involved, the significance and the envisaged consequences of such processing for your data, and the right to request human intervention;
- **Lodge a complaint with a supervisory authority**;

UC may be obligated to retain your Personal Data as required by U.S. federal or state law.

If you wish to exercise your rights, you can contact the UC Privacy Official identified below.

**9. Questions and Complaints; UC Privacy Official**

If you have questions or complaints about our treatment of your Personal Data, or about our privacy practices more generally, please feel free to contact the UC Privacy Official:  
Scott Seaborn, (510)987-0459; [Scott.Seaborn@ucop.edu](mailto:Scott.Seaborn@ucop.edu).

Effective Date: This statement is effective as of July 1, 2018