

The General Data Protection Regulation (GDPR) passed by the European Parliament went into effect in May 2018, and generally, it applies to any entity that offers goods or services to people in the EU or that collects, processes or stores data tied to EU citizens/residents. The GDPR is, at its core, about protecting identifiable data and gives individuals a choice on the processing of their personal data, regardless of where its sent, stored or processed. CSN does not physically offer goods or services in the EU (realizing that anyone can access CSN and its courses through the internet). CSN has the highest commitment to protecting from inappropriate disclosure the academic records and the personal identifying information of its students. CSN believes that it has policies and protocols already in place to protect student information regardless of the student's place of residence. CSN may come into possession of personally identifying information of people in the EU through the recruitment process or if someone enrolls at CSN.

- a) Recruitment: CSN recruits students from around the world; the goal of this recruitment effort is to enroll international students at CSN. It contracts with various companies dedicated and skilled in this international recruitment work. Generally, those companies may collect contact information from potential students for the sole purpose of recruiting them to CSN (or other colleges/universities that have engaged those same companies). CSN requires any of these recruiting companies to fully comply with the GDPR requirements to the extent they are operating in the applicable European countries. Upon enrollment a student record is created.
- b) Enrollment: CSN creates academic records pertaining to a student. This record is a listing of the courses taken, grades received, dates of attendance, etc. This record is maintained for CSN's purpose to document and report (when requested by the student) the student's academic progress and achievement. This record is subject to privacy laws of the United States and the State of Nevada, as well as the policies of CSN and the Nevada System of Higher Education. This information is not sold, distributed, included on lists, etc. The student alone can limit or direct who has access to their academic record. The CSN Registrar is the official responsible to create and maintain the official student record.

The student academic record cannot be modified without appropriate basis and application to the Registrar. A student may update or correct any of their personal information/data. Academic records are not deleted, and have a permanent life.

Other than as outlined above, CSN does not "process students'¹ data". CSN does not sell or provide information about its students to third party except as permitted or required by federal & state law and Nevada System of Higher Education policy. A student may request that CSN not provide 'directory information' concerning the student even if requested. Any questions about students' records can be directed to the Registrar.

¹ The GDPR, defines 'processing' as any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

CSN adheres to the following data protection commitments:

1. CSN will only process students' personal data to the extent necessary to provide them with our services, and always in accordance with NSHE, CSN policies, and federal/state law;
2. If CSN ever hires contractors or any other third parties to process student personal data, CSN will only allow them to do so where they are bound by a contractual and/or statutory obligation of confidentiality;
3. CSN will always ensure that there are appropriate technical and organizational measures to protect student data against personal data breaches; and
4. CSN will let students know as soon as possible and without undue delay if CSN detects that a personal data breach has occurred and communicate with individuals who are impacted by the personal data breach.