

NOTICE OF DATA PROCESSING

This notice describes how the Icahn School of Medicine at Mount Sinai (“we” or “Mount Sinai”) collects, uses, shares, and otherwise processes personal information (“personal data”) of family members who will accompany an international student, medical resident or fellow, or post-doctoral fellow (collectively referred to in this notice as “trainees”) to the United States.

Processing of Personal Data

If you are a family member accompanying an international trainee to the United States, we may process the following types of personal data, as applicable:

- Contact information (*e.g.*, name, address)
- Demographic information (*e.g.*, family information, country of origin)
- Financial and banking information (*e.g.*, checking and savings account information)
- Government identification documents (*e.g.*, passport, visa status)
- Proof of valid health insurance as required by government regulation (applicable to J2 visa applicants if principal is relying on outside funding or partial outside funding)

Most of your personal data we collect from your family member that will enroll at Mount Sinai as a trainee. We may also collect some information directly from you.

We process this personal data primarily to process your visa application and to offer you other relocation services. We may also process your information for the following purposes:

- For compliance with legal obligations, to respond to subpoenas, court orders, or other legal process, and to enforce our agreements and contracts
- To meet the obligations of private organizations with oversight over Mount Sinai, such as accreditation organizations
- To protect the health, safety, or rights of you, faculty and staff, other trainees, and visitors
- To prevent or investigate fraud or other unlawful activity, and to protect the security of Mount Sinai’s property, website, and other systems

The lawful bases for the collection and other processing of personal data by Mount Sinai are the following:

- Processing is necessary for the purposes of the legitimate interests pursued by Mount Sinai (*e.g.*, improving services to international students and their families)
- Processing is necessary to process transactions requested by you and to meet our contractual obligations (*e.g.*, to provide services offered through our Office of International Affairs)

- Processing is necessary to comply with a legal obligation to which Mount Sinai is subject (*e.g.*, processing visa applications)
- With your consent, when applicable

We will share your personal data, only as necessary, in the following manner:

- With vendors that we engage to provide services (*e.g.*, service providers, IT vendors)
- U.S. government agencies as necessary for compliance with law (*e.g.*, U.S. Citizenship and Immigration Services), with law enforcement authorities when necessary, and other third parties to enforce our legal rights

Consent for Transfer of Personal Data Outside the European Economic Area (“EEA”) and United Kingdom (“UK”)

By submitting an application form, you consent to transferring your personal data to Mount Sinai in the United States. The data protection laws in the United States may not offer you the same protections as in your country. We comply with applicable U.S. laws protecting individuals’ privacy and employ reasonable technical and organizational safeguards in order to protect the privacy and security of your personal data. We may also transfer your personal data to third parties, including our vendors, as described in this notice that may be located outside of the EEA or UK as permitted by applicable law.

You have the right to withdraw this consent at any time. The withdrawal of your consent will not affect the lawfulness of transfers that occurred prior to the withdrawal. In order to withdraw your consent, please contact Compliance.info@mountsinai.org. If you withdraw your consent to such transfers, we will continue to process your personal data for other purposes consistent with this notice.

Retention of Data

We retain your personal data for as long as necessary to process your visa application. Thereafter, we retain certain personal data for our record-keeping and archiving purposes and as necessary to comply with legal and contractual obligations.

Individual Rights

You may have the following legal rights under applicable law with respect to the personal data processed by Mount Sinai:

- To access the personal data that we have about you
- To request that we rectify or erase your personal data
- To request that we restrict the way we use your personal data
- To object to the way we use your personal data
- To ask us to transfer your personal data to someone else
- To lodge a complaint with a data protection authority in the EEA

Our ability or obligation to comply with your requests may be limited by applicable law and our internal policies, procedures, and operations.

Contact Information

The controller of the personal data described in this notice is:

Icahn School of Medicine at Mount Sinai
1 Gustave L. Levy Place
New York, NY 10029-5674

If you have questions about the processing of your personal data, or would like to request to exercise one of your rights as a data subject, please contact us at Compliance.info@mountsinai.org.