

NOTICE OF DATA PROCESSING

This notice describes how the Icahn School of Medicine at Mount Sinai (“we” or “Mount Sinai”) processes your personal data if you are applying to be a student, medical resident or fellow, or post-doctoral fellow (collectively referred to in this notice as “trainees”) at Mount Sinai. In connection with your application, we will need to collect, use, share, and otherwise process personal information about you (“personal data”). This document describes how we will process your personal data in connection with your application and, if admitted or accepted, how we will process your personal data in connection with your enrollment into the training program.

Processing of Personal Data

We may process the following types of personal data:

- Information you provide on your application form and other forms you submit to us (*e.g.*, basic biographical and family information, contact information, academic history, employment history, immigration history)
- Any information you (or third parties) submit to us (or one of our vendors) as part of your application (*e.g.*, transcripts, references, written correspondence, test scores)
- 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 J1 visa applicants relying on outside funding or partial outside funding)

Most of your personal data we collect directly from you when you complete application forms or otherwise communicate with Mount Sinai. We also obtain information about you from other sources (*e.g.*, references, transcripts, test scores). Unless we tell you that certain information is optional, this information is necessary in order for you to participate in your training program at Mount Sinai.

We may process this personal data for the following purposes, as applicable:

- To consider your application for the training program and to communicate with you about your application
- To consider your application for financial aid
- To conduct research related to the application process and enrollment, including research related to issues specific to international applicants
- 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

If you are accepted to a training program at Mount Sinai, we may also process your personal data for the following purposes, as applicable:

- To take steps necessary for your registration and/or employment with Mount Sinai
- To procure an appropriate visa classification
- To offer you and your family assistance through our Office of International Affairs, such as relocation assistance and assistance with visas
- To administer the financial aspects of the relationship (*e.g.*, tuition billing, payroll)
- To improve our services to international students

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, ensuring compliance with accreditation standards)
- Processing is necessary to process transactions requested by you and to meet our contractual obligations (*e.g.*, to evaluate your application, 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 application materials for as long as necessary to coordinate the admissions and registration process. 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.