

Privacy Policy

AMERICAN COUNCILS STUDY AND RESEARCH ABROAD

This Privacy Policy applies to personally-identifiable information, also known as personal data, collected from admittees and participants in an AC Study and Research Abroad program and used for the administration of their AC Study and Research Abroad program. This Privacy Policy does not apply to programs and services unrelated to AC Study and Research Abroad programs.

Information We Collect

We only collect information about participants if we have a reason to do so to facilitate the administration of any AC Study and Research Abroad program.

Alternates, and participants of AC Study and Research Abroad programs are required to share some personal data with us, including: contact information; education history; personal information and history; demographic information; medical health information; and other information they choose to disclose to program staff or that is necessary for participant placement or disability accommodations.

We also ask for personal data about finalists' admittees' parents, legal guardians, and emergency contacts. This may include their names, addresses, email addresses, telephone numbers, and other information.

How and Why We Use Personal Information

It is our practice not to collect personal data unless we need it or intend to use it for the purposes of administering AC Study and Research Abroad programs. We use the information we collect to manage our programs and related alumni activities, as well as to fulfill our legal responsibilities to provide monitoring, evaluation, and reporting.

We use personal data as mentioned above and for the purposes listed below:

- To communicate with participants;
- To facilitate the administration of our programs – for example, to make selection decisions, to facilitate placement of students in individual program sites or with host family and roommate accommodations, to respond to request for accommodations, and to assist participants with obtaining visas for travel, when necessary;
- To provide support to participants before and during our programs; and
- To facilitate AC Study and Research Abroad alumni connections and events

Legal Bases for Collecting and Using Information

Our use of participant personal data is made on the following legal bases:

- The use is necessary for compliance with a legal obligation;
- The use is necessary to protect participants' vital interests or those of another person;
- We have a legitimate interest in using the participant information, as described below; or
- Participants have given us their consent.

We rely on several legitimate interests in our use and sharing of participant personal data, including:

- Providing and improving our programs;
- Administration of our operations;

- Determining appropriate academic placement, and reporting relating to completion and academic performance of the respective AC Study and Research Abroad program and language evaluation;
- Promoting the success of our current and former students;
- Maintaining ongoing relationships with alumni, and helping them to connect with one another;
- Providing opportunities for participation in events;
- Conducting research;
- Understanding how our services are used;
- Ensuring the safety and security of our students, employees and others;
- Meeting reporting requirements set by the federal government;
- Maintaining records;
- Recommending appropriate programs for potential participants;
- Evaluating and selecting participants for our programs;
- Making program, host country/location and host family placements and accommodations, when applicable;
- Facilitating student travel and program arrangements;
- Meeting our obligations and enforcing our legal rights.

How We Share Information

AC Study and Research Abroad may share student personal data with various American Councils' offices, affiliated organizations, and third-party business partners. Our third-party business partners may include program funders, service providers, foreign partner host universities or language centers, host families, and others located in the United States of America and throughout the world that work with us to deliver our programs and other services. All third-party business partners that we share participant personal data with are required to comply with applicable regulations and privacy requirements. We also seek to ensure that our various American Councils offices, affiliated organizations, and third-party business partners will safeguard and protect the student data we provide. We do not sell or otherwise transmit student personal data to third parties for any purpose other than program administration.

We share information about students in limited circumstances, using appropriate safeguards for their privacy and taking reasonable steps to minimize the amount or nature of information shared:

- **Funders:** Personal data collected by American Councils may be provided to funders of the AC Study and Research Abroad programs at their request to facilitate their legitimate interest in the administration of the program.
- **Partners, Employees, and Independent Contractors:** We may disclose information about participants to our partners, our employees, and individuals who are our independent contractors who need to know the information in order to help us facilitate our programs or to process the information on our behalf.
- **Third-Party Vendors:** We may share information about participants with third-party vendors who need to know certain information about participants in order to provide their services to American Councils, or to provide their services to participants on our behalf.
- **Legal Requests:** We may disclose information about participants in response to a subpoena, court order, or other governmental request. We will strive to limit the scope of information furnished under these circumstances to only that which is necessary to satisfy the specific request and our legal obligations to provide such information.
- **To Protect Rights, Property, and Others:** We may disclose information about participants when we believe, in good faith, that disclosure is reasonably necessary to protect the property or rights of American Councils, third parties, or the public at large.

- **With Participant Consent:** We may share and disclose information with participant consent or at participants' direction. For example, we may share participant information with third parties with which participants authorize us to do so.
- **Aggregated or De-Identified Information:** We may share information that has been aggregated or reasonably de-identified, so that the information could not reasonably be used to identify a participant.

Medical and Housing Information

In order to facilitate our programs, AC Study and Research Abroad may share any information from a student's medical forms, disability accommodation forms, and the medical review process that is necessary to facilitate placement, to arrange housing and medical accommodations, or to comply with local laws, regulations, and institutional policies.

In order to facilitate the students' placement in program housing, AC Study and Research Abroad shares limited personal data and medical information with prospective hosts, including students' ages, genders, allergies, dietary restrictions, medical conditions that require specific accommodations as determined by the medical review process and program staff, and other personal information, such as religious affiliation, that students choose to provide that would affect placement.

Testing and Program Evaluation Data

AC Study and Research Abroad finalists admittees and participants may be required to take Reading, Listening and Writing exams, administered by American Councils, and an Oral Proficiency Interview (OPI) language evaluation before the AC Study and Research Abroad program begins and again upon completion of the program. In addition, all AC Study and Research Abroad participants are required to complete post-program evaluations. Individual AC Study and Research Abroad sites may also require pre- and post-program language tests.

On occasion, an AC Study and Research Abroad program may receive and review requests from academic researchers in second language acquisition for access to test score data and measures for program evaluation. Research scholars in second language acquisition and related fields may find AC Study and Research Abroad data a valuable resource for purposes of improving our understanding of how languages are learned and the impact of immersion language programs on the acquisition of language and cultural knowledge, leading to improvements in the teaching and learning of foreign languages.

In such cases, following a review of the research project and protocols for protecting data, American Councils may provide test score and program evaluation data to scholars with all personally identifying information about individual participants removed. Generic data such as language level, age, gender, and years of language experience may be shared, if relevant to the project, but only after all names and other identifying information has been removed.

Program Testing and Additional Research

American Councils staff also periodically conduct national research on foreign language learning during overseas study. Program questionnaires and test data provided by AC Study and Research Abroad participants are an important part of this research. Therefore, American Councils would welcome your permission to use your program questionnaires and testing data in future studies. However, you are under no obligation to provide this consent, and refusing to do so will in no way affect your program grades or overall standing. All data submitted by participants and used for research purposes is coded and analyzed so that participants' names do not appear. Data are stored separately from name-code lists.

- American Councils protects the privacy and confidentiality of its participants and respondents, maintains the confidentiality of the data they collect, and safeguards all processes and procedures against the unauthorized release of data that may be linked to any particular individual.

- Information collected in any American Councils project is strictly used for program management, assessment, evaluation, and research purposes only. American Councils staff may not use this information for personal gain or for any non-research or program administration purpose.
- When used in reports and publications, all data from research and results of tests are presented only in aggregate form, stripped of any names or other identifying information.
- All data linked to identifiable respondents are considered sensitive information and will only be used for the purposes they were collected, unless respondents waive confidentiality for specified uses.
- Any data files with respondent names or other identifying information will be accessed only by authorized personnel and will be used only for the purpose for which they were intended.

Educational Records

AC Study and Research Abroad shares participant student record information, including academic progress, general health and well-being, program activities, language assessments, disciplinary actions, and other components of the participant's application or information in the participant's program file with third parties, including overseas program staff, host families, and other third parties and vendors working with American Councils, to facilitate placement, to arrange housing and medical accommodations, to comply with local laws, regulations and institutional policies, to otherwise administer the AC Study and Research Abroad programs, and in the case of emergency. AC Study and Research Abroad further shares this information with Bryn Mawr College.

How Long We Keep Information

We keep the personal data that participants share with us for as long as it is necessary for us to provide participants with our program services, for as long as it is necessary for us to administer alumni and other outreach activities, and for as long as it is required for us to meet our oversight and reporting requirements and responsibilities. American Councils retains identifying student information for a period consistent with applicable data retention policies. American Councils also retains a participant's medical records, accommodation forms, and academic performance within AC Study and Research Abroad for a period consistent with applicable document retention policies. Personal data may be retained for a longer period of time if necessary to establish and assert any claims or defend against them.

How Data is Maintained and Transmitted

American Councils uses a secure system for collecting, storing, and handling personal data. Such system is used when working with its partner universities, host families, program's funders, and other third parties. American Councils transmits personal data by methods that maintain the security of such data. American Councils restricts access to, receipt of, and use of participant personal data to those in need of access to such data to complete specific program tasks.

Contact Us

Participants with any questions or concerns about this policy, our privacy and data security practices, or if they feel that we are not abiding by this Privacy Policy, should contact us immediately, as follows:

Graham Hettlinger, Director of Higher Education,
American Councils for International Education

1828 L St NW Ste 1200
Washington DC 20036-5136

ghettlinger@americancouncils.org
+1-202-833-7522