

# **Privacy Notice**

## **European Union (EU)/ European Economic Association (EEA) General Data Protection Regulation (GDPR), United Kingdom (UK) GDPR and Swiss Federal Act on Data Protection (FADP)**

### **Baylor College of Medicine Privacy Notice**

**Effective Date:** May 12, 2026

This addendum supplements Baylor College of Medicine's Privacy Notice for individuals residing in the European Economic Area (EEA), the United Kingdom (UK), and Switzerland. Where provisions of this addendum conflict with the main Privacy Notice, this addendum shall prevail for EEA, UK, and Swiss data subjects.

## **1. Controller Identity and Representatives**

### **Data Controller**

**Baylor College of Medicine**  
One Baylor Plaza

Houston, TX 77030, USA  
Email: [researchdatasecurity@bcm.edu](mailto:researchdatasecurity@bcm.edu)

### **EU/EEA GDPR Article 27 Representative**

In accordance with Article 27 of the General Data Protection Regulation (EU) 2016/679, Baylor College of Medicine has appointed the following representative in the European Union:

**Formiti Data International UK Ltd**  
6 Fern Road, Sandyford,  
Dublin, D18 FP98  
Ireland  
Email: [BCMeurep@formiti.com](mailto:BCMeurep@formiti.com)

The EU Representative acts as a contact point for data subjects and supervisory authorities in the EEA on all matters related to the processing of personal data.

### **UK GDPR Article 27 Representative**

In accordance with Article 27 of the UK General Data Protection Regulation, Baylor College of Medicine has appointed the following representative in the United Kingdom:

**Formiti Data International UK Ltd**  
Grosvenor House, 11 St Pauls Square  
Birmingham B3 1RB  
United Kingdom  
Email: BCMEUrep@formiti.com

The UK Representative acts as a contact point for data subjects and the Information Commissioner's Office (ICO) on all matters related to the processing of personal data.

## **Swiss FADP Representative**

In accordance with Article 14 of the Swiss Federal Act on Data Protection (FADP), Baylor College of Medicine has appointed the following representative in Switzerland:

**Formiti Data International**  
Chamerstrasse 172, 6300  
Zug (eigene Büros)  
Switzerland  
Email: BCMchrep@formiti.com

The Swiss Representative acts as a contact point for data subjects and the Federal Data Protection and Information Commissioner (FDPIC) on all matters related to the processing of personal data.

## **2. Legal Bases for Processing Personal Data**

Under EU/ EEA GDPR, UK GDPR, and Swiss FADP, Baylor College of Medicine processes your personal data only when we have a valid legal basis. The table below identifies our lawful bases for each processing activity:

<b>Processing Purpose</b>	<b>Data Categories</b>	<b>Legal Basis (GDPR Art. 6 and Art. 9)</b>
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<p>Admission process, enrollment, financial aid administration, student account management, advising, development, delivery of education programs, recruitment, regulatory reporting, academic progress tracking, accreditation, and other education-related activities</p>	<p>a) Identification data, b) contact details, c) academic records, d) financial information, e) admissions and enrollment data</p>	<p><b>Art. 6 (1)(b)</b> Processing necessary for the performance of a contract; <b>Art.6 (1) (c)</b> compliance with legal obligations; <b>Art. 6 (1) (f)</b> legitimate interests in managing educational programs</p>
<p>Manage a student account</p>	<p>a) Identity Data , b) contact details, c) health/genetic data, provider information</p>	<p><b>Art. 6(1)(b)</b> Performance of contract + <b>Art. 9(2)(a)</b> Explicit consent for special category data</p>
<p>Facilitation or sponsorship of visa applications for study, work, or research</p>	<p>a) Identification data, b) education data c) employment data</p>	<p><b>Art.6 (1) (c)</b> Compliance with legal obligations; <b>Art.6 (1) (e)</b> public interest in education and research</p>
<p>Processing employment or independent contractor applications</p>	<p>a) Identification data, b) education data c) employment data</p>	<p><b>Art. 6(1)(b)</b> Steps prior to entering into a contract; <b>Art.6 (1) (c)</b> Compliance with legal obligations; <b>Art. 6 (1) (f)</b> legitimate interests in recruitment</p>
<p>Receiving donations, fundraising, or providing marketing information including social media analytics</p>	<p>a) Identification data, b) contact details, c) donation history, d) communication preferences, social media engagement data</p>	<p><b>Art. 6 (1) (a)</b> Consent (for marketing communications); <b>Art. 6 (1) (f)</b> legitimate interests in promoting institutional activities</p>
<p>Providing treatment and health services, scheduling appointments, and estimating costs</p>	<p>a) Health and medical information, b) contact details, c) payment and insurance information</p>	<p><b>Art. 6(1)(b)</b> Performance of contract <b>Art. 9(2)(h):</b>provision of health or social care or treatment or the management of health or social care systems and services” (health or social care condition).</p>

Collecting customer feedback and surveys	a ) Identification data (if not anonymous), b) contact details, c) opinions and responses (if containing personal data)	<b>Art. 6 (1) (f)</b> Legitimate interests in improving services; <b>Art. 6 (1) (a)</b> consent (if participation voluntary)
Allowing persons to conduct research at BCM	a) Identification data, b) education and employment data, c) research-related data	<b>Art.6(1)(b)</b> Performance of a contract; <b>Art.6 (1) (c)</b> compliance with legal obligations; <b>Art. 9(2)(h)</b> public interest in research
Protecting or defending the rights, safety, or property of BCM	a) Identification data, b) contact details, c) Technical data	<b>Art. 6 (1) (f)</b> Legitimate interests; <b>Art.6 (1) (c)</b> <b>compliance</b> with legal obligations
Complying with legal and regulatory obligations	a) Any relevant personal data as required by law or regulation	<b>Art.6 (1) (c)</b> <b>Compliance</b> with legal obligations
Generating demographic or statistical research to improve programs	a) Demographic, b) academic, c) operational program data	<b>Art. 6 (1) (f)</b> Legitimate interests;
Ensuring functionality, reviewing, or improving services and enforcing policy	a) Technical data, b) feedback data, (if containing personal data) c) operational data	<b>Art. 6 (1) (f)</b> Legitimate interests in service management and policy enforcement
Evaluating website usage, improving website and email utility, and enhancing web experience	a) Technical Data	<b>Art. 6 (1) (a)</b> Consent (for cookies/analytics); <b>Art. 6 (1) (f)</b> legitimate interests in website performance and security

Table 1: Legal bases for processing personal data under EU/EEA GDPR

## Special Category Data

Genetic data, health information, data revealing racial or ethnic origin, biometric data, natural person's sex life or sexual orientation information are classified as **special category data** under Article 9 of EU/EEA GDPR, UK GDPR,

and as sensitive personal data under Swiss FADP. Baylor College of Medicine processes this information only under the following conditions:

- **Explicit consent:** You have provided clear, specific, and informed consent for the processing of your genetic, health, biometric data, data revealing racial or ethnic origin, person's sex life or sexual orientation data for the research purposes described in this Privacy Notice,
- **Research purposes:** Where your data is processed for scientific research purposes under Article 9(2)(j) GDPR and in accordance with the safeguards required by Article 89 GDPR, including, where appropriate, the pseudonymisation of your data and other technical and organisational measures to protect your rights and freedoms. Where data is irreversibly anonymised so that you are no longer identifiable, it is no longer considered personal data and may be used for research outside the scope of the EU/EEA GDPR, UK GDPR, and CH FADP.

You may withdraw your consent for processing special category data at any time by contacting [researchdatasecurity@bcm.edu](mailto:researchdatasecurity@bcm.edu) or your regional representative. Withdrawal does not affect the lawfulness of processing based on consent before withdrawal.

### 3. International Data Transfers

#### Transfers from the EU/EEA, UK, and Switzerland to the United States

Personal data collected from individuals in the EU/EEA, UK, or Switzerland is transferred to and processed in the United States, where Baylor College of Medicine operates. The United States does not benefit from an adequacy decision under EU/EEA GDPR, UK GDPR, or Swiss FADP.

To ensure appropriate safeguards for your personal data, Baylor College of Medicine relies on the following transfer mechanisms:

- **Standard Contractual Clauses (SCCs):** We have implemented the European Commission's Standard Contractual Clauses (2021/914) with relevant third-party processors and within our corporate group to ensure adequate protection for EU/EEA personal data transfers.
- **UK International Data Transfer Agreement (IDTA):** For UK personal data, we use the UK Information Commissioner's Office (ICO) International Data Transfer Agreement or the UK Addendum to the EU SCCs.
- **Swiss Federal Data Protection Act (FADP) Safeguards:** For Swiss personal data, we apply the Swiss Federal Data Protection and Information Commissioner's (FDPIC) approved contractual clauses or ensure compliance with the modernized FADP transfer requirements.

Upon request, you may obtain a copy of the safeguards we have implemented by contacting our EU/EEA, UK, or Swiss representatives listed above, or by emailing [researchdatasecurity@bcm.edu](mailto:researchdatasecurity@bcm.edu)

## **Third-Country Transfers to Research Partners**

When we share deidentified or pseudonymized genetic data with research institutions or pharmaceutical partners located outside the EU/EEA, UK, or Switzerland, we ensure:

- Data is adequately anonymized or pseudonymized to eliminate direct identification.
- Appropriate contractual safeguards (SCCs or equivalent) are in place with recipients.
- Technical and organizational measures are implemented to protect data integrity and confidentiality.

## **4. Cookie Consent and Tracking Technologies**

We use cookies and similar technologies to make our website work, to understand how it is used, and, where applicable, to improve your experience.

In the EU and UK, under the ePrivacy Directive, UK PECR and GDPR/UK GDPR, we will not place any non-essential cookies (for example, cookies used for preferences, analytics, or marketing) on your device unless you have given us your explicit, informed consent.

For users in Switzerland, we comply with the Swiss FADP and Telecommunications Act. Where Swiss law requires your consent for non-essential cookies, we will obtain it in advance. Where Swiss law allows us to use certain cookies based on our overriding private interests, we will inform you clearly about these cookies and provide you with an easy and immediate way to opt out of them at any time.

We are currently completing technical changes to our cookie and tracking controls so that all non-essential cookies and similar technologies are fully blocked until you make a choice in our cookie banner. During this short implementation period, it is possible that some non-essential cookies or tags may load before your preferences are recorded.

You can withdraw your consent or change your cookie settings at any time, for example through your browser settings or our cookie controls, if available.

Strictly necessary cookies, which are required for the website to function securely and properly, are used without your consent, but only for this limited purpose.

More detailed information about the cookies we use, why we use them, how long they last, and your choices is provided in our separate Cookie Policy, which is available on request.

## **5. Data Retention**

We keep your personal data only for as long as it is needed for the purposes for which it was collected or as required by law, regulation, or our contractual obligations.

We determine how long to retain different categories of personal data by considering:

- Applicable legal, regulatory, tax, accounting, and reporting requirements
- Our contractual commitments
- Our legitimate business and institutional needs
- The time periods needed to establish, exercise, or defend legal claims

These rules are set out in the Baylor College of Medicine Data Retention Policy. A summary of our main retention periods is available on request.

## **6. Your Rights Under EU/EEA GDPR, UK GDPR, and Swiss FADP**

In addition to the rights described in the main Privacy Notice, EU/EEA, UK, and Swiss data subjects have the following rights:

### **Right of Access (Art. 15 GDPR) (Art. 25 FADP)**

You have the right to obtain confirmation as to whether we process your personal data and to receive a copy of your personal data, along with information about how and why we process it.

### **Right to Rectification (Art. 16 GDPR) (Art. 32 FADP)**

You have the right to request correction of inaccurate or incomplete personal data we hold about you.

### **Right to Erasure / Right to be Forgotten (Art. 17 GDPR) (Art. 32 FADP)**

You may request deletion of your personal data when:

- The data is no longer necessary for the purposes for which it was collected.
- You withdraw consent (where consent is the legal basis), and we have no other legal ground for processing.

- You object to processing based on legitimate interests, and we have no overriding legitimate grounds.
- The data was unlawfully processed.
- Deletion is required to comply with a legal obligation.

**Please note:** This right is not absolute. We may retain data where necessary to comply with legal obligations (e.g., medical record retention requirements), establish or defend legal claims, or for archiving purposes in the public interest.

### **Right to Restriction of Processing (Art. 18 GDPR) (Art. 30/32 FADP)**

You may request that we restrict processing of your personal data where:

- You contest the accuracy of the data (during verification).
- Processing is unlawful, but you prefer restriction to deletion.
- We no longer need the data, but you require it for legal claims.
- You have objected to processing, and we are verifying whether our legitimate grounds override yours.

### **Right to Data Portability (Art. 20 GDPR) (Art. 28 FADP)**

You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit it to another controller where:

- Processing is based on consent or contract performance.
- Processing is carried out by automated means.

### **Right to Object (Art. 21 GDPR) (Art. 30/32 FADP)**

You have the right to object at any time to processing of your personal data based on legitimate interests (Art. 6(1)(f)) or for direct marketing purposes. Upon objection to direct marketing, we will cease such processing immediately.

### **Right to Withdraw Consent**

Where processing is based on consent, you have the right to withdraw consent at any time. Withdrawal does not affect the lawfulness of processing before withdrawal.

### **Right to Lodge a Complaint**

You have the right to lodge a complaint with your local data protection supervisory authority if you believe our processing of your personal data violates applicable law:

- **EU/EEA residents:** Contact your national Data Protection Authority. A list is available at: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)
- **UK residents:** Information Commissioner's Office (ICO)  
Website: <https://ico.org.uk>  
Telephone: +44 (0) 303 123 1113

- **Swiss residents:** Federal Data Protection and Information Commissioner (FDPIC)  
Website: <https://www.edoeb.admin.ch>  
Telephone: +41 (0)58 462 43 95
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## 7. Exercising Your Rights

### How to Submit a Request

To exercise any of the rights described above, please contact:

- **Email:** [researchdatasecurity@bcm.edu](mailto:researchdatasecurity@bcm.edu)
- **EU Representative:** [BCMeurep@formiti.com](mailto:BCMeurep@formiti.com)
- **UK Representative:** [BCMukrep@formiti.com](mailto:BCMukrep@formiti.com)
- **Swiss Representative:** [BCMchrep@formiti.com](mailto:BCMchrep@formiti.com)
- **Complete the online request form:** [click here](#)

Or mail your request to:

**Baylor** College of Medicine

**Privacy Official**  
Office of Research

One Baylor Plaza, MS 310

Houston, TX 77030

### Verification Process

To protect your privacy and security, we will verify your identity before processing your request. Verification may require:

- Matching the information, you provide with data we hold about you.
- Requesting a copy of government-issued identification.
- For authorized representatives: valid power of attorney or written authorization from the data subject.

### Response Timeframe

We will respond to your request **within one month** of receipt, in accordance with GDPR Article 12(3). Where requests are complex or numerous, we may extend this period by two additional months and will inform you of the extension and reasons within the initial one-month period.

## 8. Data Protection Officer

Baylor College of Medicine has designated a Privacy Official who serves functions similar to a Data Protection Officer. While not formally registered as a DPO under Article 37 GDPR, this official oversees data protection compliance and is your primary contact for privacy-related inquiries:

**Privacy Official**

Email: [researchdatasecurity@bcm.edu](mailto:researchdatasecurity@bcm.edu)

Telephone: 713-798-5475

## 9. Automated Decision-Making and Profiling

Baylor College of Medicine does not engage in automated decision-making or profiling that produces legal effects or similarly significantly affects you without human intervention. Should this change, we will update this notice and provide you with information about the logic involved and the significance and consequences of such processing, as required by Article 13(2)(f) and Article 22 GDPR.

## 10. Changes to This Addendum

We may update this addendum from time to time to reflect changes in our practices or legal obligations. Material changes will be communicated to you via:

- Email notification to your registered email address.
- Prominent notice on the BCM Website.
- Updated version published at: <https://www.bcm.edu/privacy>The "Effective Date" at the top of this document indicates when this addendum was last revised.

## 11. Contact Information Summary

Entity/Role	Contact Information
Baylor College of Medicine (Controller)	Privacy Official Office of Research One Baylor Plaza, MS 310, Houston, TX 77030 T: 713-798-5475   E: <a href="mailto:researchdatasecurity@bcm.edu">researchdatasecurity@bcm.edu</a>

EU GDPR Representative	<b>Formiti Data International UK Ltd</b> 6 Fern Road, Sandyford, Dublin, D18 FP98 Ireland Email: <a href="mailto:BCMeurep@formiti.com">BCMeurep@formiti.com</a>
UK GDPR Representative	<b>Formiti Data International UK Ltd</b> Grosvenor House, 11 St Pauls Square Birmingham B3 1RB United Kingdom Email: <a href="mailto:BCMukrep@formiti.com">BCMukrep@formiti.com</a>
Swiss FADP Representative	<b>Formiti Data International</b> Chamerstrasse 172, 6300 Zug (eigene Büros) Switzerland Email: <a href="mailto:BCMchrep@formiti.com">BCMchrep@formiti.com</a>
EEA Supervisory Authorities	<a href="https://edpb.europa.eu/about-edpb/about-edpb/members_en">https://edpb.europa.eu/about-edpb/about-edpb/members_en</a>
UK ICO	<a href="https://ico.org.uk">https://ico.org.uk</a> \ Tel: +44 (0) 303 123 1113
Swiss FDPIC	<a href="https://www.edoeb.admin.ch">https://www.edoeb.admin.ch</a> Tel: +41 (0)58 462 43 95

Table 4: Contact directory for data protection inquiries