

Eastern Michigan University PIPL PRIVACY POLICY SUPPLEMENT

This PIPL Privacy Policy Supplement (the “**PIPL Policy Supplement**”) applies to the handling of Personal Information (as defined herein), by Eastern Michigan University and its centers, institutes, foundations, subsidiaries, and affiliates (“**University**,” “**we**,” “**our**,” or “**us**”) subject to the Personal Information Protection Law of the People’s Republic of China (“**China**”), through its website, products, and services, including but not limited to academic advising, admissions, educational programs, career centers, research, community service, health centers, medical care, food services, and other services provided by the University (the “**Services**”).

This PIPL Policy Supplement describes how we collect, use, disclose, transfer, and protect such Personal Information, your rights and choices with respect to your Personal Information, how this PIPL Policy Supplement will be updated, and how you can contact us if you have any questions or concerns. For the purposes of this PIPL Policy Supplement, “China” refers to the continental landmass under the direct control of the People’s Republic of China, including the islands of Hainan Province and five major autonomous regions (i.e., Tibet, Inner Mongolia, Xinjiang, Ningxia, and Guangxi), but excluding the Hong Kong Special Autonomous Region (SAR), Macao SAR and Taiwan.

We understand the importance of Personal Information to you and will do our best to ensure the security and reliability of your Personal Information. We are committed to maintaining your trust in us and abiding by the following principles to protect your Personal Information: consistency between rights and responsibilities, clear purpose, optional consent, minimum necessary, security assurance, subject participation, and openness and transparency.

Please carefully read and understand this PIPL Policy Supplement before using our Services, and contact us using the details at the bottom of this PIPL Policy Supplement if you have any doubts, comments, or suggestions.

1. Scope of this PIPL Policy Supplement

This PIPL Policy Supplement applies to you if you are a natural person, not a corporation, partnership, or other legal entity and if the University handles your Personal Information in the following ways:

- Inside China: The University handles your Personal Information within the borders of the PRC; or
- Outside China: You are physically located in China, and the University handles your Personal Information outside the borders of China in order to 1) provide you goods or services, 2) analyze or assess your activities, or 3) comply with other circumstances as provided by Chinese laws or administrative regulations, including the Civil Code of the People's Republic of China, the Cybersecurity Law of the People's Republic of China, the Data Security Law of the People's Republic of China, the Personal Information Protection Law of the People's Republic of China, the Provisions on Standard Contracts for Personal Information outbound Transfer and other laws, regulations and departmental rules of the People's Republic of China.

If you are located outside China and you provide your Personal Information to the University outside China, this PIPL Policy Supplement does not apply to that information.

2. Personal Information We Collect and Handle

In this PIPL Policy Supplement, “**Personal Information**” means any information, recorded by electronic or other means, relating to an identified or identifiable individual and does not include information that underwent anonymization. We may collect Personal Information about you from various sources described below. “Handle” or “Handling” as used in this PIPL Policy Supplement means any operation or set of operations performed on Personal Information or on sets of Personal Information, whether or not by automated means, and includes the collection, storage, use, processing, transmission, provision, publication, and erasure of Personal Information.

General categories of Personal Information include but are not limited to the following:

Basic personal information	Name, date of birth, gender, ethnic group, nationality, family relatives and relationships, address, personal phone number, email address, demographic information, etc.
Personal identity information	Government ID card, military officer certificate, passport, driver’s license, employee ID, student ID, social security number, tax identification number, PRC Resident Certificate, etc.
Personal biometric information	Genetic information, fingerprint, voice print, palm print, auricle, iris, and facial recognition features, etc.
Online identity information	A PI subject’s username, IP address, and personal digital certificate (public key certificate or identity certificate).
Physiological and health information	Records generated in connection with medical treatment, such as pathological information, hospitalization records, physician’s instructions, test reports, surgical and anesthesia records, nursing records, medication administration records, drug and food allergy, fertility information, medical history, diagnosis and treatment, family illness history, history of present illness, history of infection, and personal health information such as weight, height, and lung capacity.
Personal education information	Personal occupation, position, work unit or department, educational background, academic degree, educational experience, work experience, training records, transcript, entrance exam score, coursework, evaluations, disciplinary complaints, other education records, etc.
Personal property information	Bank account, authentication information (password), bank deposit information (including amount of funds, payment and collection records), real estate information, credit reports, credit information, credit and debit card numbers, transaction and consumption records, bank statement, etc., and virtual property information such as virtual currency, virtual transaction and game CD Keys.
Personal communication information	Communications records and content, SMS, MMS, emails, data that describe personal communications (often referred to as metadata), etc.

Contact list information	Contact list, friend list, list of chat groups, email address list, etc.
Personal web surfing record	Refers to records of a PI Subject's operations stored in server logs, including web browsing records, software use records, click records, and favorites.
Information of frequently used equipment	Refers to the information identifying the equipment often used by an individual, including hardware serial number, equipment MAC address, and unique equipment identifier (e.g. IMEI/Android ID/IDFA/Open UDID/GUID, SIM card IMSI information).
Personal location information	Including records of whereabouts, precise location information, temporary lodging (boarding) information, longitude and latitude.
Other information	Financial aid information, work history, donation history, marriage history, requests for accommodations or leave, insurance information, military service, religious preference, political views, sexual orientation, undisclosed criminal records, background check information, personal references, metadata, etc.

Such information may be collected by the University in the following manners:

Information Provided by You

- **Account Information.** If you create an account to use our Services, we collect Personal Information related to its creation and the usage of our Services via this account. When you sign up, you may provide us with your name, email address, password, mobile phone number, interests, and other account information.
- **Browsing Preferences.** If you navigate our website, we may collect data on your browsing preferences.
- **Communications.** When you contact us via a contact form, email, or other means, you provide us with Personal Information, such as your name and contact details, and the content, date, and time of our communications.
- **Careers.** If you apply for a job with us, you may provide us with your resume, name, contact details, and any other relevant information. If you become an employee, we may collect additional information, such as your emergency contacts, beneficiary selections, and other relevant information for employment, payroll, and benefit purposes, and we may collect certain sensitive Personal Information such as biometric data for identity verification or financial information.
- **Sensitive Personal Information.** We may collect the following sensitive kinds of Personal Information from you:

Examples of Sensitive Personal Information

Personal property information	Bank account, authentication information (password), bank deposit information (including amount of funds, payment and collection records), real
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	estate information, credit reports, credit information, transaction and consumption records, bank statement, etc., and virtual property information such as virtual currency, virtual transaction and game CD Keys.
Physiological and health information	The records generated in connection with medical treatment, including pathological information, hospitalization records, physician's instructions, test reports, surgical and anesthesia records, nursing records, medicine administration records, drug and food allergies, fertility information, medical history, diagnosis and treatment, family illness history, history of present illness, history of infection.
Personal biometric information	Genetic information, fingerprint, voice print, palm print, auricle, iris, and facial recognition features, etc.
Personal identity information	Government ID card, military officer certificate, passport, driver's license, employee ID, student ID, social security number, PRC Resident Certificate, etc.
Other information	Sexual orientation, marriage history, religious preference, undisclosed criminal records, communications records and content, contact list, friends list, list of chat groups, records of whereabouts, web browsing history, precise location information, temporary lodging (boarding) information, etc., and any Personal Information relating to minors under 14 years of age.

- **Support Information.** When you request technical support services, we will handle your Personal Information such as your name and the contact details you use to contact us, as well as information about the reasons for your support request, and any additional information you may provide in that context.
- **Social Media Names.** If you elect to allow us to do so, or purchase a product or service from us, we may collect your social media account names.
- **Student Records.** If you apply and/or are admitted to the University, we will collect data as part of your application and admission, and on-going status as a student of the University.

Where applicable, we may indicate whether and why you must provide us with your Personal Information as well as the consequences of failing to do so. For example, it may be necessary for you to disclose certain Personal Information in order for us to provide the Services to you.

Information Collected from Other Sources

- **Third Parties.** We may obtain Personal Information about you from third parties, the names of which we will provide when we provide Services to you, and other entities. This information

may include names, contact information, interests, location data, etc. and other similar information.

- **Partners and Service Providers.** We use partners and service providers, such as application facilitators, payment processors and analytics providers, to perform services on our behalf. Some of these partners have access to Personal Information about you that we may not otherwise have (for example, if you sign up directly with that provider) and may share some or all of this information with us. We use this information to administer our services and conduct marketing and advertising campaigns, as well as to process transactions that you request.
- **Single Sign-On.** Some of our Services allow you to register and log in to them through a third-party platform. When you choose to login to one of our Services through a third-party platform, you allow us to access and collect any information from your third-party platform account permitted under the settings and privacy policy of that platform. We use this information to deliver this functionality and the Services to you.
- **Supplemental Information.** We may receive additional Personal Information from third-party sources, such as credit reference agencies and public or private databases, or companies or institutions that may sponsor or facilitate your participation in one of our programs, which we may append to existing Personal Information, such as email address verification. We may use this supplemental information to process transactions that you request and to prevent fraud, deliver relevant offers and advertising to you, and to improve our operations, services and our advertising and marketing campaigns.

Information We Collect by Automated Means

- **Social Media.** We may collect Personal Information via social media tools, widgets, or plugins to connect you to your social media accounts. These features may allow you to sign in through your social media account, share a link, or post directly to your social media account. When you visit a website that contains such tools or plugins, the social media or other service provider may learn of your visit. Your interactions with these tools are governed by the privacy policies of the corresponding social media platforms.
- **Cookies.** Like most other website operators, we may collect Personal Information via cookies and similar technologies (see section 3 of this PIPL Policy Supplement for more information).

3. How We Use Personal Information

We may use the Personal Information we collect for the purposes stated in University's Privacy Policy and other Privacy Statements, including without limitation for the following purposes:

- **Communications.** including to contact you for administrative purposes (e.g., to provide services and information that you request or to respond to comments and questions) or to send you marketing communications, including updates on promotions and events, relating to products and Services offered by us.
- **Personalization,** including to customize our Services to you and provide you with the most relevant marketing and advertising materials.
- **Admissions and Academic Programs,** including normal and necessary communication with you regarding your status as a student, including but not limited to:
 - To provide information about the University and its programs by giving you access to or sending you relevant information about University programs and events

- To respond to requests for information about admission to the University
 - To recruit, evaluate, and manage persons who apply to the University for admission, take courses at the University, participate in programs offered by the University, or attend the University, either in person or online, and to perform related activities
 - To operate and facilitate the registration and participation in online and in-person education programs
 - To evaluate applications for and administer financial aid, including reporting to relevant federal and state government agencies
 - To facilitate application for and sponsoring of visas to study, work and/or research at the University, including all functions necessary to comply with applicable immigration laws
 - To assign housing and facilitate housing requests for individuals studying or participating in programs at or through the University
 - To conduct study abroad programs offered by or coordinated through the University
 - To provide on-campus and distance learning information technology and other services to students, including network, authentication and help desk services
- **University Research**, including to allow and facilitate individuals to perform research at or with the University, or to utilize individuals as subjects of research performed at or through the University, and to perform activities related to such research.
 - **Business, Finance and Procurement**, including conducting transactions and business with individuals, such as processing payments made by credit card to the University and payments made by the University to you, or engaging the services of an independent contractor and all uses incident to that engagement.
 - **Human Resources**, including employing persons to work for the University and all uses incident to that engagement including but not limited to evaluation and management of employees and administration of employee benefits.
 - **Alumni Engagement**, including to stay connected with University alumni and providing information about alumni events located on and off-campus.
 - **University Advancement**, including to raise funds to support the University and its programs.
 - **Community Outreach and Engagement**, including to provide information about University events that are open to the community, to provide relevant information and resources to the local community, to facilitate volunteer programs, to host community events, etc. and related activities.
 - **Aggregation and Anonymization**. We may aggregate or anonymize Personal Information and use the resulting information for statistical analysis or other purposes.
 - **Administrative and Legal**, such as to address administrative issues or to defend our legal rights and to comply with our legal obligations and internal policies as required by state and federal laws, and as permitted by Chinese law.
 - **Sensitive Personal Information**. We may use the sensitive Personal Information collected in order to provide tailored and relevant browsing, purchasing and customer service experiences; to improve our services; to comply with applicable laws; in connection with research activities; and to support advancing the University's mission.

- **Automated Decision-Making (ADM).** We may handle your Personal Information using automated means to help make decisions about how we provide the Services to you. For the purposes of the PIPL and this PIPL Policy Supplement, “automated decision-making” refers to the activity of using computer programs to automatically analyze or evaluate personal behaviors; habits; hobbies; or economic, health, or credit status, and then to make decisions based on the analysis of such information. You will not be subject to a decision having a major influence on your rights and interests based solely on automated processing, including profiling, unless you explicitly consent. Where we use automated decision-making to conduct information push or commercial marketing, we will provide you a convenient way to opt-out of such use of automated decision-making, or we will simultaneously provide options that are not specific to your characteristics. Whenever we use automated decision-making for any purpose, we will do so transparently and will strive to produce fair and equitable outcomes; we will never use automated decision-making to give unreasonable or differential treatment to you in terms of pricing or other purchase or trading conditions.
- **Marketing.** If you visit our website, we may use your Personal Information to market to you.
- **Providing Other Services,** including to operate, maintain, support, and provide our Services.

4. Legal Bases for the Handling of Personal Information

We rely on various legal bases to handle your Personal Information, including:

- **Consent.** You may have consented to the use of your Personal Information, for example to send you electronic marketing communications or for the use of certain cookies. We will obtain your consent for the handling of sensitive Personal Information. You may withdraw your consent at any time by contacting us as described in Section 12 of this PIPL Policy Supplement.
- **Contract.** We need your Personal Information to provide you with our Services and to respond to your inquiries.
- **Legal.** We may have a legal obligation to handle your Personal Information when necessary to fulfill statutory duties and responsibilities or statutory obligations, for example to comply with state and federal obligations.
- **Public Interest.** We may also handle your Personal Information when necessary to respond to sudden public health incidents or protect individuals’ lives and health, or the security of their property, under emergency conditions.

5. How We Use Children’s Personal Information

As an institution of higher education, our Services are mainly adult-oriented. A child should not provide us their Personal Information without consent of their parents or guardians. Children’s Personal Information that is collected with their parents’ or guardians’ consent will only be used or publicly disclosed when it is required or permitted by applicable laws, explicitly consented to by their parents or guardians, or is essential to protecting the children. Although the definition of children varies in local laws and customs, we regard anyone below 14 years old as a child. If we find that a child’s Personal Information has been collected without their parents’ or guardians’ prior consent, we will delete relevant information as soon as possible.

6. How We Disclose Personal Information

We may disclose Personal Information about you in the following circumstances:

- **Group Entities.** We may disclose Personal Information about you to our affiliates and subsidiaries.
- **Service Providers.** We work with third parties to provide services such as hosting, maintenance, and support. We sometimes refer to these partners and service providers as “entrusted parties.” These third parties may have access to or handle your Personal Information as part of providing those services to us, but they are prohibited from using your Personal Information for their own purposes.
- **Legal.** We may disclose your Personal Information when it is necessary to fulfill our duties and obligations under applicable law.
- **Public Posts.** Any information that you voluntarily choose to post to a publicly accessible area of our Services will be available to anyone who has access to that content.
- **Anonymized Information.** Personal Information that has been processed to make it impossible to identify specific natural persons and impossible to restore. We may use and disclose anonymized information for any purpose, unless we are prohibited from doing so under applicable law.
- **Business Partners.** We may share Personal Information such as name, address, purchase history and related data with our business partners, including information technology service providers, other service providers, and other related entities. We share Personal Information with our business partners in order to provide a relevant service experience, and for other related purposes.
- **Merger.** Information about our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets. In such a scenario, we will notify you of the name of the Personal Information recipient and how to contact such recipient. We will require the recipient to continue to fulfill the duties of [University Name] outlined in this PIPL Policy Supplement, or we will require the recipient to seek your consent. If any changes are made to how they use your Personal Information, the recipient will notify you of such changes as provided by applicable laws.

7. Your Rights and Choices

As provided under applicable Chinese law and subject to any limitations in such law, you have the following rights, which you may also exercise on behalf of a deceased person to whom you are the next of kin, for the sake of your own lawful and legitimate interests, except where the deceased has arranged otherwise before death:

- **Right to Know and Limit.** You have the right to know and make decisions about the processing of your Personal Information, and the right to limit or refuse the handling of your Personal Information by others, unless otherwise provided for by law.
 - If the purpose or method of processing your Personal Information or the type of Personal Information or who has access to your Personal Information changes, you will be notified and asked to re-consent to the change(s).

- **Right to Consult and Copy.** You have the right to consult and copy your Personal Information, except when it is necessary for the University to maintain confidentiality or when otherwise provided for by applicable law. The University will respond to your requests to consult or copy your Personal Information in a timely manner.
- **Right to Transfer.** You may request that the University transfer your Personal Information to another Personal Information handler. If the University is permitted to make the transfer under applicable law, the University will facilitate the transfer.
- **Right to Correct or Supplement.** You have the right to request that the University correct any inaccurate Personal Information that it maintains about you. You also have the right to request that the University complete any incomplete Personal Information that it maintains about you, which could be accomplished by incorporating a supplementary statement that you submit. If the University concurs that the Personal Information is incorrect or incomplete, the University will correct or complete it in a timely manner.
- **Right to Delete. In certain situations, you may ask to have your Personal Information anonymized or deleted, as appropriate.** You can submit a request to delete your Personal Information to us under the following circumstances:
 1. Our handling purposes have been achieved or cannot be achieved, or your Personal Information is no longer necessary for achieving the purposes of handling;
 2. We no longer provide you with our Services, or the retention period has expired;
 3. Our handling was based on your consent, and you withdraw your consent;
 4. Our handling of Personal Information violates applicable laws or regulations; or
 5. Other circumstances as provided by applicable laws or regulations.
 - When you delete Personal Information from our Services, we might not immediately delete the corresponding information from our backup system, but will delete it when the backup system is updated.
- **Right to Withdraw Consent.** You may withdraw any consent you previously provided to us regarding the handling of your Personal Information at any time and free of charge. We will apply your preferences going forward. This will not affect the lawfulness of the handling before you withdrew your consent.
- **Right to Explanation.** You have the right to request the University to explain our Personal Information handling rules.

You may exercise these rights by contacting us using the contact details at the end of this PIPL Policy Supplement, and we will respond. We will not charge you for your reasonable requests in principle. However, a fee to reflect the cost will be imposed as appropriate on repeated requests beyond reasonable scope. We may reject repeated requests that are groundless and need excessive technological means (e.g. developing a new system or fundamentally changing the current practices) to fulfill, bring about risks to others' legitimate rights and interests, or are downright impractical (e.g. involving information stored on a backup disk).

Note that applicable laws contain certain exceptions and limitations to each of these rights. We will not be able to respond to your request when it: affects our compliance with obligations under applicable laws and regulations; directly relates to national security or defense security; directly

relates to public security, public health, or major public interests; directly relates to criminal investigations, prosecutions, trials, and enforcement of court decisions, etc.; or involves trade secrets. We also will not respond to requests when we have sufficient proof that you have subjective malice or are abusing your rights; for the purpose of safeguarding your life, property, or your other important legal rights and interests or those of other individuals from whom it is difficult to obtain consent; or when responding to your request would cause serious harm to your legitimate rights and interests, or those of other individuals or organizations.

If we do not grant your rights request, we will explain the reason for doing so. For security, we may require you to submit your request in writing, and we will also need to verify your identity before you exercise these rights to ensure that your Personal Information is not inappropriately disclosed.

8. International Data Transfers

We provide our Services based on our resources and servers worldwide, so your Personal Information might be transmitted to or accessed from the United States or other jurisdictions outside of the People's Republic of China when necessary for business or other valid purposes.

Such jurisdictions might have different data protection laws, or even no relevant laws. Under such circumstances, we will take measures to comply with applicable data protection laws regarding the protection of Personal Information. For example, we may ask you for your consent to the cross-border transmission of your Personal Information, or we may employ information de-identification and other security measures before the cross-border transmission of information.

9. Data Security, Minimization, and Retention

We use physical, managerial, and technical safeguards that are designed according to industry standards to protect your Personal Information and prevent unauthorized access to, disclosure, use, modification, damage or loss of information.

We will delete or anonymize your Personal Information when it is no longer necessary for the purposes for which we handle it, unless we are required or allowed by law to keep it for a longer period. When determining the retention period, we select the shortest retention period necessary to achieve the purpose of the handling and take into account various criteria, such as the type of products or services provided to you, the nature and length of our relationship with you, mandatory retention periods, and applicable statutes of limitations.

The University's data retention policies and schedules may be found here: <https://www.emich.edu/privacy-data-retention/data-retention/index.php>

The network environment is not 100% secure. While we strive to use commercially reasonable means to protect Personal Information, we cannot guarantee its absolute security.

In the case of an actual or reasonably suspected Personal Information leak, distortion, or loss ("**Personal Information Breach**"), if we cannot or do not adopt measures that are able to effectively avoid harm created by the Personal Information Breach, then we will, in a timely manner and in accordance with applicable laws and regulations, inform you of the categories of Personal Information that have been or may be breached, basic causes and possible impacts of the Personal Information Breach, remedial measures that are already taken or to be taken by us, suggestions for you regarding self-prevention and risk mitigation, and contact information of the person or team responsible for handling the Personal Information Breach. At the same time, we will also take the initiative to report the handling of Personal Information Breaches in accordance with applicable regulatory requirements.

10. Third-Party Services

Our Services may contain features or links to websites and services provided by third parties. Any information you provide via these websites or services is provided directly to these third-party operators and is subject to their privacy policies, even if accessed through our Services. We encourage you to learn about these third parties' policies before providing them with your Personal Information.

11. Changes and Updates to this PIPL Policy Supplement

We may update this PIPL Policy Supplement from time to time to reflect changes in our privacy practices. We will follow applicable laws and regulations regarding notification of such changes. We will release any change to the PIPL Policy Supplement on this page.

12. How to Exercise Your Rights

Eastern Michigan University is the entity responsible for the handling of your Personal Information. If you have any questions, doubts, comments, or suggestions about this PIPL Policy Supplement, our privacy practices, or if you would like to exercise your rights with respect to your Personal Information, please contact us through our Ethics & Compliance Reporting webpage at <https://www.compliance-helpline.com/welcomePageEMU.jsp>, or by mail at:

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