

	<i>Policy Level:</i>	President's Cabinet ▾
	<i>Responsible Department:</i>	Information Technol... ▾
	<i>Effective Date:</i>	10/24/2025
<b>Data Subjects in the European Union, United Kingdom and China</b>		

**PURPOSE:**

The purpose of this policy is to restrict all aspects of Niagara University’s operations so as neither to structure its operations to provide/envisage offering goods or services to individuals in the European Union (EU), United Kingdom (UK), or China, nor to monitor their behavior.

**SCOPE:**

Niagara University faculty, staff, and students.

**TERMS AND DEFINITIONS:**

None

**MAIN PROVISIONS:**

On May 25, 2018, the General Data Protection Regulation (“GDPR”) of the European Parliament took effect, restricting the processing of personal data of individuals within the European Union. For entities not established in the EU, GDPR applies to the extent that an entity:

1. envisages offering goods or services to data subjects in the EU,
2. or monitors the behavior of individual data subjects insofar as their behavior takes place within the EU.

See GDPR Article 3; Recital 23.

On August 20, 2021, China adopted the Personal Information Protection Law of the People’s Republic of China (“PIPL”), which applies to “the processing of personal information of natural persona within the territory of [China],” as well as “the processing outside the territory of [China] of the personal information of natural persons within the territory of [China]” under the following circumstances:

1. When the purpose is to provide products or services to natural persons inside [Chinese] borders;
2. When analyzing or assessing activities of natural persons inside [Chinese] borders; or

3. Other circumstances provided in laws or administrative regulations.

PIPL Art. 3(1)-(3).

**PROCEDURES:**

Niagara University has analyzed its operations in light of these standards and has determined that its operations do not fall into any categories of the GDPR, UK GDPR, or PIPL. NU/NUO does not provide/envisage offering goods or services to individuals in the EU, UK, or China, and does not monitor the behavior of individuals in the EU, UK, or China. In determining that its operations fall outside the categories of GDPR, UK GDPR, and PIPL coverage, NU/NUO has made the following findings:

- NU/NUO does not direct a substantial amount of its marketing efforts or advertising communications toward, or provide/envisage offering goods or services to individuals in the EU, UK, or China. Although NU/NUO may, from time to time, advertise and market its international exchange program that is administered by third-party colleges and universities located in the EU, UK, and China, and generically advertise and market to prospective international students on its website.
- NU/NUO does not monitor the behavior of EU, UK, or Chinese residents for purposes of profiling, e.g., determining preferences or future action. Tracking conducted on NU/NUO's website is intended to aid in website performance and/or diagnostics. Marketing efforts and related analytics tools are not specifically directed toward EU, UK, or Chinese residents as such.
- IP addresses of NU/NUO website connections are logged for performance tracking, security and anti-fraud purposes. Logging is passive only, and student or potential student behavior is not monitored online beyond our website.

It is the policy of NU/NUO to continue to restrict these and all aspects of its operations so as neither to structure its operations so as to provide/envisage offering goods or services to individuals in the EU, UK, or China, nor to monitor their behavior. NU/NUO faculty, staff, and students are prohibited from using NU/NUO IT assets in such a way that would implicate application of any of these regulatory regimes. If you have any questions concerning such use, please contact.

**ADDITIONAL INFORMATION:**

None

**REFERENCED POLICIES:**

None

**STATUTES AND REGULATIONS:**

GDPR Article 3; Recital 23, PIPL Art. 3(1)-(3)

**POLICY HISTORY:**

- Originated: 10/24/2025
- Current Effective Date: 10/24/2025
- Next Review Date: 10/24/2028
- Revision/Renewal Log:
  - None