John Carroll
U N I V E R S I T Y

Policy: Interim Symptom Assessment Application Privacy Policy	**Policy Number:** I-7.9
Policy Owner(s): Information Technology	**Original Date:** August 11, 2020
Last Revised Date:	**Approved Date:** August 11, 2020

I.   **POLICY**: In furtherance of its efforts to take preventative measures for the health and safety of   the University community, John Carroll University ("JCU" or "University") has collaborated with ivy.ai (the maker of #CampusClear) and other external vendor(s) in order to facilitate an app-based daily symptom assessment in connection with efforts to prevent and control the spread of COVID-19 and related illnesses. Data collected from this app, in conjunction with other data collected by JCU, may also be used to identify and limit campus contact with ill individuals, provide University community members with direction regarding treatment and testing, undertake/assist in contact tracing, collaborate with public health authorities, undertake processes outlined in the COVID-19 Interim Policy, and/or undertake other efforts aimed at mitigating the risks posed to the University community or broader community by communicable diseases. The Interim Symptom Assessment Application Privacy Policy ("Policy") outlines the privacy expectations applicable to such data along with the ways that the University may have to disclose certain data in the interests of public health and safety.

II.   **PURPOSE**: The purpose of this Policy is to establish expectations concerning how the University will utilize data collected from or otherwise derived from its symptom assessment application and other related data sources.

III.   **SCOPE**: This Policy applies to John Carroll faculty, staff, employees, students or any other individual providing information through the JCU-affiliated version of #CampusClear or related efforts.

IV.   **PROCEDURES**: The University desires to balance the need to appropriately utilize data collected via its app-based symptom self-assessment system, #CampusClear, and other related processes for University health and safety purposes and the privacy interests of individuals providing data via the app. This policy will govern the use of such data.

1. **Consent:** By providing information via #CampusClear and related processes, a JCU employee (faculty member, staff, or other employee), student, or any other individual (collectively "User(s)") consents to the University utilizing that data consistent with this policy and other applicable University processes/policies.   Users also are consenting to

the collection of data by ivy.ai, or other vendors as applicable, who may then process that data and share it with JCU. The collection of data by JCU or third-party vendors such as ivy.ai is authorized by this policy and by the applicable user agreement and/or privacy policies maintained by such vendors. To the extent that this policy conflicts with or contradicts other general University policies, then this policy shall prevail and govern the use of information provided by a User to the fullest extent allowable by law.

2. **Use of Data:** The information collected via the #CampusClear Application or other related processes may be used by the University to mitigate the risks associated with COVID-19 and related illnesses. Although information provided by Users will be treated as private information, it may be necessary to disclose information collected internally and/or externally on a need-to-know basis in order to protect the health and safety of the University and broader community.

   a. **Internal Disclosures**. JCU may need to disclose information submitted by Users via #CampusClear and other related processes or derived from such information within the JCU community in order to internally manage its health and safety planning processes (e.g. review by appropriate JCU administrators to advise individuals and determine appropriate public health measures). Additionally, it may be necessary to share certain information submitted by individuals or derived from such information to third parties (e.g. those exposed to the individual) as part of JCU's public health and safety response and contact tracing processes so that they can determine whether or not they need to take health precautions. These disclosures may sometimes include information that indicates or infers that the User reporting the symptoms or information have tested positive for COVID-19 or may have been a possible point of exposure for COVID-19.

   b. **External Disclosures**. JCU may need to disclose information submitted by Users via #CampusClear and other related processes or derived from such information to individuals or entities outside of JCU in order to comply with its obligations to public health authorities, to warn the JCU and broader community about public health issues, as part of contact tracing, and/or to provide information required by appropriate governmental authorities

   c. **Other Disclosures**. JCU reserves the right to use data provided by Users via the app for other purposes that in its sole judgment are appropriate in order to protect the health and safety of the University community.

   d. **Questions About Data**. Individuals who have questions about the data JCU is collecting or the manner in which such data is

being used should contact Jim Burke (burke@jcu.edu) in order to discuss these issues.

3. **Amendments:** This interim policy governs a rapidly evolving health and safety issue and thus it may be amended immediately upon the publication of an updated version on JCU's website at https://jcu.edu/hr/policies.

V.   **CROSS REFERENCES**:

[COVID 19 Interim Policy](#)