



Confidentiality of Records Policy

August 2023



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1. Introduction

- 1.1. Hult complies with the U.S. Family Education Rights and Privacy Act of 1974 as amended (FERPA). This act protects the privacy of education records, establishes the right of students to inspect and review their own education records, and provides students the right to file grievances and complaints.
- 1.2. Hult also complies with the General Data Protection Regulation (EU) 2016/679 (the EU GDPR) and the U.K. Data Protection Act of 2018 (the UK DPA) and the General Data Protection Regulation as retained in UK Law by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (the UK GDPR). These laws protect the privacy of data subject's records. This means that every student has the right to know the purpose for which his or her details are being processed, and that the school will not pass on a student's personal information without the student's explicit permission. Any information provided to the school may be held on computers and shall be used by the school and its authorized agents in accordance with the EU GDPR, UK DPA and UK GDPR.
- 1.3. Students have the right to inspect their official records and files with certain exceptions, such as certain financial records and recommendations where the right of access has been waived. Student records are kept in the office and can only be reviewed in the office during normal business hours.
- 1.4. Should students take exception to anything they find in their file on the grounds that it is misleading, or otherwise inappropriate, they have the right to challenge its inclusion and to seek to have it deleted or corrected. In such cases, they should submit a written request to the Registrar's Office for a joint meeting with the Dean, and any other appropriate person(s) to discuss the matter in question.

2. Notification of Rights Under FERPA

- 2.1. FERPA affords eligible students certain rights with respect to their education records. (An "eligible student" under FERPA is a student who is 18 years of age or older or who attends a postsecondary institution.) These rights include:
 - 1) The right to inspect and review the student's education records within 45 days after the day the Hult receives a request for access. A student should submit to the registrar, dean, head of the academic department, or other appropriate official, a written request that identifies the record(s) the student wishes to inspect. The school official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the



school official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed.

- 2) The right to request the amendment of the student's education records that the student believes is inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA. A student who wishes to ask the school to amend a record should write the school official responsible for the record, clearly identify the part of the record the student wants changed and specify why it should be changed. If the school decides not to amend the record as requested, the school will notify the student in writing of the decision and the student's right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.
- 3) The right to provide written consent before the university discloses personally identifiable information (PII) from the student's education records, except to the extent that FERPA authorizes disclosure without consent. The school discloses education records without a student's prior written consent under the FERPA exceptions, including for example disclosure to school officials with legitimate educational interests. A school official is a person employed by Hult in an administrative, supervisory, academic, research, or support staff position (including law enforcement unit personnel and health staff); a person serving on the board of trustees; or a student serving on an official committee, such as a disciplinary or grievance committee. A school official also may include a volunteer or contractor outside of Hult who performs an institutional service or function for which the school would otherwise use its own employees and who is under the direct control of the school with respect to the use and maintenance of PII from education records, such as an attorney, auditor, or collection agent or a student volunteering to assist another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for Hult. Upon request, the school also discloses education records to officials of another school in which a student seeks or intends to enroll.
- 4) The right to file a complaint with the U.S. Department of Education concerning alleged failures by Hult to comply with the requirements of FERPA. The name and address of the office that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

- 2.2. FERPA permits the disclosure of PII from students' education records, without consent of the student, if the disclosure meets certain conditions found in the FERPA regulations. Except for disclosures to school officials, disclosures related to some judicial orders or lawfully issued subpoenas, disclosures of directory information, and disclosures to the student, FERPA regulations requires the institution to record the disclosure. Eligible students have a right to inspect and review the record of disclosures. A postsecondary institution may disclose PII from the education records without obtaining prior written consent of the student:



- To other school officials, including teachers, within Hult whom the school has determined to have legitimate educational interests. This includes contractors, consultants, volunteers, or other parties to whom the school has outsourced institutional services or functions.
- To officials of another school where the student seeks or intends to enroll, or where the student is already enrolled if the disclosure is for purposes related to the student's enrollment or transfer.
- To authorized representatives of the U.S. Comptroller General, the U.S. Attorney General, the U.S. Secretary of Education, or State and local educational authorities, such as a state postsecondary authority that is responsible for supervising the university's state-supported education programs. Disclosures under this provision may be made, in connection with an audit or evaluation of federal- or state-supported education programs, or for the enforcement of or compliance with federal legal requirements that relate to those programs. These entities may make further disclosures of PII to outside entities that are designated by them as their authorized representatives to conduct any audit, evaluation, or enforcement or compliance activity on their behalf.
- In connection with financial aid for which the student has applied or which the student has received, if the information is necessary to determine eligibility for the aid, determine the amount of the aid, determine the conditions of the aid, or enforce the terms and conditions of the aid.
- To organizations conducting studies for, or on behalf of, the school, in order to: (a) develop, validate, or administer predictive tests; (b) administer student aid programs; or (c) improve instruction.
- To accrediting organizations to carry out their accrediting functions.
- To parents of an eligible student if the student is a dependent for IRS tax purposes.
- To comply with a judicial order or lawfully issued subpoena.
- To appropriate officials in connection with a health or safety emergency.
- Information the school has designated as "directory information".
- To a victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense. The disclosure may only include the final results of the disciplinary proceeding with respect to that alleged crime or offense, regardless of the finding.
- To the general public, the final results of a disciplinary proceeding, if the school determines the student is an alleged perpetrator of a crime of violence or non-forcible sex offense and the student has committed a violation of the school's rules or policies with respect to the allegation made against him or her.
- To parents of a student regarding the student's violation of any federal, state, or local law, or of any rule or policy of the school, governing the use or possession of alcohol or a controlled substance if the school determines the student committed a disciplinary violation and the student is under the age of 21.



3. Directory Information

- 3.1. Although ordinarily students must consent to the disclosure of information from their education records, FERPA allows certain types of information, known as “directory information,” can be made available to the general public.
- 3.2. Directory Information includes the following: Student name, address, telephone number, email, ID photo, date of birth, educational program, date of enrollment, enrollment status, date of anticipated or actual graduation, degree received or sought, class year, participation in officially recognized activities and sports, parent or guardian address and phone number, student employment status, place of birth, permanent address and phone number. Students may opt out of public disclosure of directory information by making a written request to that effect to the Hult Registrar.

4. Transcripts

- 4.1. In compliance with FERPA and the UK GDPR, Hult assures the confidentiality of student records. Transcripts and written evaluations of a student’s performance will be released only upon the written request of the student. For example, if a student’s sponsor requests periodic evaluation of their performance, they must submit a written request to the Registrar's Office authorizing release of the information sought unless the student has previously authorized disclosure to the sponsor in accordance with FERPA or the UK GDPR (as applicable).
- 4.2. As stated in Hult’s terms and conditions, transcripts will be released provided students have made all appropriate tuition payments and fulfilled all other obligations to the school (see “Settlement of Financial Obligations”). Students are required to settle all obligations to the school (financial or otherwise) before they may receive their transcript. In addition, class academic rankings, as such, are neither calculated nor distributed.