

# Council for Global Immigration Exchange Visitor Program

## Privacy and Security of Personal Information Policy

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As an authorized sponsor of Exchange Visitor Programs administered by the U.S. Department of State and the U.S. Department of Homeland Security, the Council for Global Immigration (CFGI) is required to collect and disseminate, on a limited basis, certain personal information including but not limited to: name, date of birth, gender, passport, address, email, phone, family relationships, compensation, education and work history, for each Trainee/Intern and all accompanying dependents, as well as names, titles, addresses and other contact information for supervisors, agents and other Host Organization employees involved in administering the training or internship. Because Interns/Trainees shall be located outside of the United States, and the U.S. Host Organization and CFGI are located within the United States, the provision of Exchange Visitor services necessarily involves the cross-border transfer of such personal information by electronic means and/or mail.

This document explains CFGI's policies regarding the handling of all personal information collected, used, transmitted or maintained by CFGI in order to provide services related to CFGI's Exchange Visitor Programs.

1. "Personal Information" means any and all data (regardless of format) provided by Host Organization, its agents or employees, or the Trainee/Intern and his/her dependents, that identifies or can be used to identify the Trainee/Intern, his/her dependents or any agents or employees of the Host Organization.
2. "Process" means any operation or set of operations which is performed upon Personal Information, whether or not by automatic means, such as collection, compilation, use, disclosure, duplication, organization, storage, alteration, transmission, combination, redaction, erasure, or destruction, in order to provide Exchange Visitor services to the Host Organization, Trainee/Intern and any dependents.
3. CFGI will use commercially reasonable efforts to protect the confidentiality of all Personal Information in its possession and will process Personal Information only as necessary to provide Exchange Visitor services pursuant to all laws, rules and regulations governing the

Exchange Visitor programs, issuance of visas and government oversight of such programs.

4. CFGI may disclose Personal Information to its employees, to U.S. government agencies and their agents, and to third-party auditors (which shall conduct audits of CFGI's Exchange Visitor programs as required by U.S. Department of State regulations) as necessary to provide the Exchange Visitor services hereunder and to comply with relevant government regulations and program requirements. CFGI conducts background investigations of its employees as required by U.S. Department of State regulations.
5. CFGI implements appropriate operational, technical and organizational measures to protect Personal Information against accidental or unlawful destruction, alteration, unauthorized disclosure or access.
6. CFGI uses third-party software vendors to collect and process applications for Exchange Visitor programs. These vendors utilize servers located in the United States. The third-party software vendors are ISO 27001 certified.
7. Each Exchange Visitor application is individually passcode protected. The unique passcode is provided to the Host Organization, who will share it with the any Host Organization employee, agent or Trainee/Intern who is required to enter data, including Personal Information, into the online application. The Host Organization employee, agent, or Trainee/Intern is responsible for the security of his/her passcode, and should not share it with others. Personal Information may be entered into the application directly by the Trainees/Interns or by other employees or agents of the Host Organization. All information entered into the system with respect to a particular application is viewable by all other Host Organization employees, agents or Trainee/Interns accessing the particular application as well as by CFGI.
8. CFGI may mail a hard copy of the J-Visa DS-2019 Certificate of Eligibility form, which contains Personal Information, to the Trainee/Intern and/or the Host Organization. Such hard copy is required for the Trainee/Intern to obtain a visa at the U.S. Consulate.
9. Trainee/Intern understands and agrees that CFGI is required by law to retain all information provided (including Personal Information) for a period of time following the conclusion of each program (at the execution of this Agreement, such record retention period is three years). CFGI will ensure the continued confidentiality and security of the Personal Information retained by CFGI pursuant to its obligations as a J-1 Exchange Visitor sponsor and shall not actively Process the Personal Information except: (a) as required by law, (b) in response to requests from government officials from the U.S. Department of State, U.S. Department of Homeland Security, Student and Exchange Visitor Programs, or any other government agency in relation to CFGI's obligations as an Exchange Visitor sponsor; or (c) as needed for CFGI or its auditor to perform the audits referenced in Paragraph 4 of this policy.

10. If an individual wishes to modify or cause to be deleted Personal Information previously provided to CFGI, or if an individual has questions or complaints about this policy, please contact CFGI by one of the methods below:

By Email: [EVP@cfgi.org](mailto:EVP@cfgi.org)

By Mail to the Following Address: CFGI, 1800 Duke Street, Alexandria, VA 22314 U.S.A.,  
Attn: J-1 Visa Program

By Telephone: 001-703-535-6365

Please note, however, that due to U.S. Government regulations governing J-1 visa programs, modification or deletion of Personal Information previously submitted (a) may result in termination of the Intern/Trainee program; or (b) in some cases may not be permitted, due to government record retention requirements. Please contact us at one of the addresses or at the phone number above if you have any questions about the storing of your Personal Information.

11. Amendments to this Policy. CFGI may update this policy from time to time. If at any point we decide to use Personal Information in a manner different from that stated at the time it was collected, we will prominently post such changes prior to implementing them.