Guidelines on Export Controls
for Columbia International Travelers

General Guidance:

When travelling outside the United States in your capacity as a Columbia employee or student, or when taking Columbia owned items with you, you may take laptop computers, tablets, mobile phones, data storage devices, and other similar electronic devices, including standard, commercial "off the shelf" software loaded onto these devices, <u>provided that</u>:

- The devices are "tools of the trade" items. "Tools of the trade" means equipment that people in the same discipline would generally recognize as tools of the trade, such as laptops and mobile phones, used for the performance of work, a trade, occupation, vocation or hobby;

- The items must be of a usual and reasonable kind and quantity and intended and appropriate for your use abroad (e.g., it is reasonable to take your own laptop on vacation with you to check your work emails while abroad, but it may not be reasonable to take 10 laptops to a conference);

- The items cannot be intended for resale or other disposal while abroad. You must bring the items back with you to the United States within 1 year of leaving. This includes information and data loaded onto the device;

- You must maintain "effective control" over the items. This means either retaining physical possession of the item or securing the item in such an environment as a hotel safe or a locked or guarded meeting facility. In addition, you must take adequate security precautions to protect against unauthorized access to information on your devices (such as use of password systems and firewalls).

- The items cannot be leased, resold or rented abroad.

- Data, manuals, diagrams, and other information loaded onto the device should either be publicly available or the result of "fundamental research" conducted in the United States. "Fundamental research" refers to research in science, engineering, or mathematics, the results of which ordinarily are published and shared broadly within the research community, and for which the researchers have not accepted restrictions for proprietary or national security reasons.

In general, you can take commercially available encryption software outside the United States loaded onto your device (subject to the other requirements listed in this guidance). This includes software obtained through Columbia IT for HIPAA/HITECH compliance, as well as commercially standard versions of Guardian Edge, WinZip, Cisco VPN client, PGP, and GPG.

Certain Carve-outs:

This guidance relates to commercially available devices and commercial technology and software loaded onto such devices. This does not enable your travelling with: (1) military, space or defense grade items, software or information (including information loaded onto a device), (2) items,

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software or information that were developed, modified or configured in conjunction with a military, space or defense related agency or program, or (3) any items related to any nuclear related activity.

In addition, please obtain guidance in advance before travelling outside the U.S. with:

o Any data or information received under an obligation of confidentiality or with restrictions on publication beyond just normal checking for proprietary information and to enable patent filings or other intellectual property protection;

o Data or information from a project that is subject to contractual constraints on the dissemination of research results;

o Items that are marked as "export controlled," "subject to the "ITAR" (International Traffic in Arms Regulations), or similar language, or containing restrictions on access by non-U.S. persons;

o Data or information regarding the development, production, or use of encryption technology. (Commercially available encryption software is different than encryption data or information, which is addressed above); or

o Private information about research subjects.

If your plans do not meet the criteria outlined in this guidance, it might still be permissible to take the items with you, depending on the specific destination, nature of the technology, and other specific factors. If necessary, the University can also explore seeking specific governmental licenses to enable your trip.

For questions or if you need more detailed information about this topic, please contact:

For research activities, Columbia's Office of Research Compliance and Training at **(212) 851-2897** or research-compliance@columbia.edu**.**

For other activities, Columbia's Global Support at globalsupport@columbia.edu**.**