Foreign Travel with Computers and Other Electronic Devices - DRAFT

In most cases, if you’re traveling to a foreign country with a Vanderbilt-owned laptop installed with typical office productivity software or commercial encryption software, you will not need an export license. In order to ensure that you do not need an export license, the equipment and software should meet the following criteria:

- Must be a “tool of the trade.” This means items, software, and technology that you would use in the normal course of your work.
- Must remain under your “effective control” while overseas. This means that it must remain in your personal possession or in a locked hotel safe (a locked hotel room is not sufficient) at all times.
- Must be returned to the US (or destroyed) within 12 months.
- Must not be taken to embargoed countries.

Please visit www.vanderbilt.edu/exportcompliance for further guidance.

Please contact Vanderbilt Export Control at vec@vanderbilt.edu if your travel involves:

- an embargoed country,* or
- a laptop which has non-commercial encryption software installed, or
- a laptop which includes export controlled (EAR/ITAR) information or technical data, or
- a laptop which has hardware that is unusually sophisticated.

For questions concerning the use other encryption software for such devices or travel to an embargoed country*, please contact Vanderbilt Export Compliance at vec@vanderbilt.edu. Contact local technical support for assistance with Check Point encryption software.

Travel outside the US with laptops, PDAs, cell phones, or other storage devices involves special considerations and may require an export license. US export laws may involve:

- **Hardware.** Generally speaking, computer hardware is not subject to tight restrictions, though there are limitations on “high performance” computers exported to embargoed countries.*
- **Software.** US export laws impose significant restrictions on encryption software. Mass market commercial software is often already licensed for export—this can be confirmed by checking with the vendor (e.g., www.microsoft.com/exporting/). Non-commercial encryption software in source code or object code is particularly likely to be restricted and may require a license from the government to export; please check with Vanderbilt Export Compliance at vec@vanderbilt.edu if you have questions.
- **Controlled Data.** If you are working on a project that involves Export Administration Regulations (EAR) or International Traffic in Arms Regulations (ITAR) controlled technologies, your laptop may contain controlled technical data that may not be shared with foreign parties or physically exported without a license. It is important that you inform VEC at vec@vanderbilt.edu if such data may have been compromised while traveling due to the device being lost, stolen, or outside your control.

If your Vanderbilt owned laptop contains export controlled software or other sensitive data, particularly data that may be controlled under EAR or ITAR, please consider alternatives. For example, if you are traveling for a presentation, can you store the presentation on a memory stick and leave your computer with sensitive data at home? If you need to take a laptop for other purposes (such as email), can you take a “clean” computer that does not include restricted software, data, or other sensitive information instead? Note: If the “sensitive” data on your laptop or other storage media is considered protected or research health information per HIPAA regulation, Vanderbilt policy requires you to have it encrypted using Check Point encryption software. For more information, please visit the Vanderbilt Information Privacy and Security website at http://www.mc.vanderbilt.edu/root/vumc.php?site=InfoPrivacySecurity.

You may also not need an export license for personally-owned equipment. Please go to http://www.vanderbilt.edu/exportcompliance/newsite/documents/ExportingEncryptionSoftware.pdf for more information.

If you have any questions, please contact Marcia Williams, Assistant Director, Export Compliance (615) 343-6075, marcia.e.williams@vanderbilt.edu or Melanie Lang, Export Control Analyst (615) 322-2474, melanie.a.lang@vanderbilt.edu.

* As of the revised date, embargoed countries currently include Cuba, Iran, North Korea, Syria and Sudan. A current list can be found at http://www.treasury.gov/offices/enforcement/ofac/programs/index.shtml. Revision Date: 100109