

# ICRGU Privacy Notice

<b>Document Name</b>	ICRGU Testimonial Privacy Notice
<b>Brief Description</b>	Privacy Notice
<b>Responsibility</b>	Suzie Anderson
<b>Initial Issue Date</b>	16.01.2023

Date	Version Number	Summary of Changes	Reviewer name & department
03/11/2022	V0.1	Draft	K. Marshman - Privacy

## 1. Introduction

Navitas respects your right to privacy. This privacy notice explains who we are, how we collect, share, and use personal information about you, and how you can exercise your privacy rights.

Navitas reserves the right to make changes periodically to this Privacy Notice at our discretion, when needed. Any changes will be communicated to you, so you are kept up to date with the information you are entitled to.

## 2. Navitas

Navitas is a global education provider (ABN 69 109 613 309). Our head office is in Perth, Western Australia at the following address:

Navitas Pty Ltd Level 8 Brookfield Place

125 St Georges Terrace PERTH WA 6000 Australia

The Company has subsidiary companies and affiliated organisations operating in Australia, New Zealand, Canada, UK, Europe, Africa, Southeast Asia, North Asia, South America, the Middle East, and the USA, collectively called the “Company”.

The European head office is in the UK at the following address:

Navitas UK Holdings Limited

The Lambourn

Wyndyke Furlong

Abingdon

Oxfordshire

OX14 1UJ

You can contact Navitas for any privacy related questions or concerns, from any country in the world by emailing the Privacy Team at [privacy@navitas.com](mailto:privacy@navitas.com)

### 3. The personal data are we collecting from you and how we will use it

Navitas is collecting from you the following personal data:

Full Name

Email

College

Programme studied/studying

Degree studied/studying

Country of origin

Direct quotes regarding your ICRGU experience

Photograph (including ethnicity)

The purpose of capturing your testimonial is listed below, for full clarity.

- Celebrate and demonstrate international student diversity within ICRGU
- Showcase successes and graduate destinations of ICRGU students
- Promote ICRGU to potential students and attract them to study in Aberdeen.

We will use your photo to promote Navitas, especially its diversity and appeal to students from all backgrounds, race and ethnicity.

The consent form you have been provided with, along with this privacy notice, asks for your very specific consent to the different ways in which Navitas would like to use your image and personal data. This is detailed here for clarity and transparency. It is entirely up to you which of the following you wish to give your consent to. You may consent to all, or just some of the choices presented to you.

- ICRGU website
- ICRGU social media
- ICRGU offline advertising campaigns – direct mail, billboards, posters, event stands
- ICRGU online advertising campaigns – promoted social media posts and adverts, search engine adverts, education platform adverts
- ICRGU promotional brochure
- ICRGU promotional flyers
- ICRGU promotional event banners
- ICRGU promotional presentations to prospective students
- ICRGU video productions

Information Classification: Restricted You are entitled to withdraw your consent at any time, and Navitas will remove your photo/s from the promotional material to which you have

consented. However, please note that should you consent to your image being used for brochures and flyers, best endeavors will be made to withdraw the brochures and flyers, but there may be some copies which are no longer retrievable. This should be carefully considered when you give consent.

You can withdraw your consent for your image to be used by contacting us at [info@ic.rgu.ac.uk](mailto:info@ic.rgu.ac.uk)

You may also withdraw your consent by contacting us at [privacy@navitas.com](mailto:privacy@navitas.com)

Alternatively, you can contact us via our website contact details at [www.navitas.com](http://www.navitas.com).

Should you have any questions about this privacy notice, please contact us on [privacy@navitas.com](mailto:privacy@navitas.com)

## 4. The lawful basis for collecting and processing your personal data

Article 6 condition for lawful processing is – Consent

Article 9 condition for lawful processing of ethnicity in photographs – Explicit consent.

## 5. How long do we keep your Personal Data?

All personal data taken with your consent will be kept and used for no more than 5 years.

## 6. Sharing your Personal Data

Navitas will not share your personal data with another organization; your image will only be used internally.

However, if you consent to Navitas posting your image on social media, we will be sharing your personal data with those social media organisations you have ticked on the consent form. We would highly recommend that you read their privacy notices, which can be found on their app or website.

## 7. Processing and Transferring your Personal Data

Navitas is a global organisation. We have operations in many different geographic regions, and our head office is in Australia; therefore, we will share your personal data internationally, within our business.

It will only be shared with Navitas employees who need access it to carry out the promotional work to which you have explicitly consented.

Information Classification: Restricted

Your images will be saved on a secure system and access will be restricted to appropriate employees within our Marketing Teams.

Where your personal data is shared internally across Navitas and the countries it resides in, there is an Intra-Group Data Sharing Agreement, which includes the required safeguards, including, the new Standard Contractual Clauses, from the UK Information Commissioners Office (ICO).

## 8. Your rights over your Personal Data explained

The rights you have may be different depending on where you live in the world, or where in the world Navitas is using your personal data.

If your country is not listed below, please contact: [privacy@navitas.com](mailto:privacy@navitas.com) for further information.

If you live in the UK or the EU (including Liechtenstein, Norway, and Iceland), your rights are listed below. Please note, due to the lawful basis for processing being Consent, the Right to Object is not engaged. **You do not need to Object to the processing; instead you may simply withdraw your consent at any time.**

- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to Portability
- Right to object
- Automated individual decision-making, including profiling

If you live in Australia, you have the right to:

- Request anonymity and pseudonymity
- Request for information not to be used for marketing purposes
- Access and review personal data we hold about you
- Rectify/correct any inaccurate personal information we hold about you

Information Classification: Restricted If you live in New Zealand or Canada, you have the right

to:

- Access and review personal data we hold about you
- Rectify/correct personal data we hold about you

If you live in the United States of America, you have the right to:

- Access and review personal data we hold about
- Rectify/correct personal data we hold about you
- Be informed of any disclosures
- Request deletion of your information

For any questions, queries, or to make a request, no matter where in the world you are located, please email [privacy@navitas.com](mailto:privacy@navitas.com).

## 9. Questions or Issues you may have

If you are contacting us to complain about an alleged breach of this Privacy Notice, or you have a question, please provide us with as much detail as possible so that we can deal with your concern quickly and effectively.

We will take every privacy complaint seriously and assess it with the aim of resolving the issue swiftly.

## 10. Our Contact Details

If you wish to contact the DPO for Navitas, and raise any queries or concerns, they can be contacted via [privacy@navitas.com](mailto:privacy@navitas.com)

If you need to make a complaint about how Navitas collects and uses your personal data, we kindly ask that you contact us in the first instance on [privacy@navitas.com](mailto:privacy@navitas.com). The Regulators, no matter what country they reside in, would prefer that Navitas tries to resolve any issues with you first before you contact them.

However, the Regulators are there for your concerns, and if you feel Navitas has not handled your complaint appropriately, we encourage you to contact them. Navitas is committed to open and transparent processing of your personal data and welcome the Regulators view.

You may contact the Regulator in whichever country you live and details of them can be found via a quick Google search, if you are not already aware of them. Alternatively, please reach out to our privacy team for advice, they will be happy to assist you.

#### UK

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Email: [casework@ico.org](mailto:casework@ico.org)  
**Telephone:** 0303 123 1113  
Website - [www.ico.org.uk](http://www.ico.org.uk)

#### Australia

Australian Information Commissioner (OAIC)  
Telephone +61 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)