

# ICRGU Privacy Notice – Alumni & Photo/Quotes

<b>Document Name</b>	ICRGU Alumni & Testimonial Privacy Notice
<b>Brief Description</b>	Privacy Notice
<b>Responsibility</b>	Suzie Anderson
<b>Initial Issue Date</b>	12.07.2023

Date	Version Number	Summary of Changes	Reviewer name & department
12/07/2023	V0.1	Draft	B. Collett
13/07/2023	V0.2	Amendments	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
- Direct quotes regarding your ICRGU experience
- Photograph

The purpose of capturing this data is listed below for full clarity.

#### For testimonial use:

- To celebrate and demonstrate international student diversity within ICRGU
- To showcase successes and graduate destinations of ICRGU students
- To 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.

#### For alumni mailing list:

Please note, the below is classified as marketing, so we do need your consent but you can withdraw that consent at any time, either by emailing us on [info@ic.rgu.ac.uk](mailto:info@ic.rgu.ac.uk) or using the unsubscribe link at the bottom of each alumni email you are sent.

- To keep in touch with you, our former students, and establish an alumni community
- To organise and invite you to reunion/networking events
- To share relevant news/updates
- To gather information about your professional activity post-graduation

#### For your photo and quotes:

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

Information Classification: Restricted • 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

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, or stop marketing to you. 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?

### Marketing

General marketing will be sent to you for 5 years, and just before the end of this 5-year period, we will invite you to consent for another 5 years. This is entirely up to you.

Alumni reunions and general events we will send you information on for up to 10 years.

You may withdraw your consent at any time, either by emailing us on [info@ic.rgu.ac.uk](mailto:info@ic.rgu.ac.uk) or by unsubscribing via the link in all our emails.

### Photo and quotes

We will keep your photo and quotes for no longer than 5 years, at which time they will be securely deleted.

Information Classification: Restricted As above, you may withdraw your consent at any time by

contacting us on the identified email address.

## 6. Sharing your Personal Data

Navitas will not share your personal data with another organization; your image will only be used internally. Note, this will include our websites, as per your consent if you have provided it.

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.

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, such as 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.**

Information Classification: Restricted

- 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

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.

Information Classification: Restricted

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)

## 11. Contacting your Supervisory Authority

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)

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