

# ICRGU Privacy Notice (STEM Competition & Marketing Consent)

<b>Document Name</b>	ICRGU Privacy Notice (STEM Competition & Marketing Consent)
<b>Brief Description</b>	Privacy Notice
<b>Responsibility</b>	Suzie Anderson
<b>Initial Issue Date</b>	27.04.2023

Date	Version Number	Summary of Changes	Reviewer name & department
26/04/2023	V0.1	Draft	B. Collet - Marketing
27/04/2023	V0.2	Amendments	K. Marshman - Privacy
27/04/2023	V1	Final version	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 and International College Robert Gordon University (ICRGU) are asking you to consent for two different reasons/purposes, so you have a choice about how we use your personal data.

Navitas is collecting from you the following personal data:

- Your full name
- Your email address
- Your school's name
- Your STEM-related essay

The purpose of capturing these details is listed below, for full clarity.

**Purpose 1** - Consent supplied by you via you filling out the competition form from the link provided by your school. For consent to be valid, you must give a positive indication of your wishes. By completing the form, after reading this privacy notice, you are giving consent for ICRGU/Robert Gordon University (RGU) to do the following:

- Hear about your ideas and passion for STEM
- Enter you into our STEM competition
- Invite you to the exclusive STEM awards event, where we will announce the winning competition entries
- Post details of the STEM competition and winner(s) on social media

Social media platforms used by Navitas are:

- LinkedIn
- Facebook
- Instagram
- You Tube

If you are not comfortable with any of the above social media platforms, please let us know at [info@ic.rgu.ac.uk](mailto:info@ic.rgu.ac.uk).

**Purpose 2** - The online form you complete will have a requirement to indicate whether you are happy to receive marketing information from us. This will include the below:

- Access to ICRGU/RGU STEM resources
- Information about ICRGU/RGU STEM news and events.

Tick the Yes box if you are happy to receive marketing emails, and No, if you do not want to receive marketing emails from us. The choice is entirely yours.

Information Classification: Restricted

You are entitled to withdraw your consent at any time 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

### For the STEM competition

Article 6 condition for lawful processing is – **Consent** (achieved by you being happy to complete the online form with your personal details.)

### For Marketing

Article 6 condition for lawful processing is – **Consent** (provided by you ticking the Yes box on the online form should you wish to receive marketing from us in accordance with this notice).

## 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. This applies to the STEM competition and the marketing consent you provide.

Where competition winners' information is posted on social media, the social media platforms will have their own privacy notices which will give you information on how long your personal information will be kept by them. We strongly advise you read those as well. If you can't find them, contact us at [privacy@navitas.com](mailto:privacy@navitas.com) and a link can be provided.

## 6. Sharing your Personal Data

Navitas will not share your personal data with another organization, except those social media platforms detailed above.

## 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.

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

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)

## 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)