

Use of personal details privacy notice (for Alumni communications)

Document Name	The Hague Pathway College Use of personal details privacy notice (for Alumni communications)
Brief Description	Privacy Notice
Owner	The Hague Pathway College
Initial Issue Date	05/05/2023

Date	Version Number	Summary of Changes	Reviewer name & department
04/05/2023	Draft V0.1	For use with THPC Alumni	L. Prasser - THPC
09/05/2023	Final Version V1	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".

Information Classification: Public

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The Netherlands head office is at the following address:

Navitas Netherlands BV
Johanna Westerdijkplein 75
2521 EN Den Haag
Netherlands

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

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

Navitas are collecting from you the following personal data:

- Full Name
- Bachelor/Master programme
- Personal email address
- Student ID number
- When you started at THPC

We will use these details to communicate and process your information to:

- Contact you about Alumni events
- Contact you about Alumni news and updates relating to the College and University

The consent form you have been provided with, along with this privacy notice, asks for your details and consent to contact you.

You are entitled to withdraw your consent at any time and Navitas will remove your details to which you have consented.

You can withdraw your consent by contacting us at general@thehaguepathway.nl

You may also withdraw your consent by contacting us at privacy@navitas.com

Alternatively, you can contact us via our website contact details at www.navitas.com

Should you have any questions about this privacy notice, please contact us on privacy@navitas.com

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

- Article 6 condition for lawful processing is – Consent

5. How long do we keep your Personal Data?

All images taken with your consent will be securely kept and used for no more than 25 years. This is a long timespan for marketing consent, but due to the purpose of the marketing, around alumni and events, there will be events and news which we hope you will be interested in. Reunions which may take place at 10 years and 20 years, for example. **However, please remember you can unsubscribe at any time using the link at the bottom of any email we send you.**

6. Sharing your Personal Data

Information Classification: Public Navitas will not share your personal data with another organisation, your details will only be used internally.

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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 to your images 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, including, for example, 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 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 anytime.**

- 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:

- Information Classification: Public
- Access and review personal data we hold about you
 - Rectify/correct personal data we hold about you

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- 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

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

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. 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.

<p><u>The Netherlands</u></p> <p>Autoriteit Persoonsgegevens PO Box 93374 2509 AJ DEN HAAG</p> <p>Telephone: (+31) - (0)70 - 888 85 00 Website: www.autoriteitpersoonsgegevens.nl</p>	<p><u>UK</u></p> <p>Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p> <p>Email: casework@ico.org Telephone: 0303 123 1113 Website - www.ico.org.uk</p>
<p><u>Australia</u></p> <p>Australian Information Commissioner (OAIC) Telephone +61 1300 363 992</p>	

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Email: enquiries@oaic.gov.au Website: www.oaic.gov.au	
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