

Privacy Notice for Navitas English Student Photos

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Brief Description	Privacy Notice for Navitas English Photos
Owner	Kristie Marshman
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Date	Version Number	Summary of Changes	Reviewer name & department
24/03/2023	V0.1	Draft	K. Marshman - Privacy
05/10/2023	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
UK

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.

During your time with Navitas English we like to take photos and videos of you to promote Navitas English. Since these photos and/or videos could be taken at any time, by any member of the college staff, it is not possible to gain consent from all students each time. Instead, we have used “legitimate interests” as a lawful basis instead of consent, in line with privacy and data protection requirements.

However, it is really important that you understand that you can exercise your “right to object” at any time. This means you just need to email your college, or the privacy team on privacy@navitas.com and we will ensure your photo and/or video are not taken from that point on.

This is entirely your choice, so feel free to let us know if you would rather not be involved.

Photos and videos taken will only be used on Navitas English website, and social media. They will not be passed onto anyone else, nor shared outside of Navitas.

However, social media will have its own way of using your images, so we do strongly recommend you read up on their privacy notices so you understand how your image will be used once shared. Each social media website will have their own way of using personal data posted. Navitas uses the following social media. You may object to them all, or just those you might not be comfortable with.

- Facebook
- Instagram
- LinkedIn
- You Tube
- TikTok
- Twitter

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

- Article 6 condition for lawful processing is – Legitimate Interests

A copy of the Legitimate Interests Assessment can be provided upon request by emailing privacy@navitas.com

5. How long do we keep your Personal Data?

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

6. Sharing your Personal Data

Navitas English will not share your personal data with any other Colleges, or Navitas, which is the parent company.

We won't share your photos with suppliers, agents or other university partners.

It is for college use only, on their website and social media.

7. Processing and Transferring your Personal Data

Your images will be saved on a secure system and access will be restricted to appropriate employees within Navitas English.

Your personal data will not be transferred outside the UK, unless by the social media platforms used. Again, we urge you to read their privacy notices, which will confirm.

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.

- 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

The Right to Object is highlighted above as it is particularly relevant when we use legitimate interests, as it allows you to “opt out” of the way we intend to use your personal data.

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.

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.

UK

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

Email: casework@ico.org
Telephone: 0303 123 1113
Website - www.ico.org.uk

Australia

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