



Talent Privacy Notice

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

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

Navitas are collecting from you the following data personal data and photo/video of your image and voice:

Full Name
Email
College/Campus
Photograph (including ethnicity)

We will use these photos/videos to promote Navitas globally, especially its diversity and appeal to students from all backgrounds, race and ethnicity.

The purpose of the content shoot is listed below, for full clarity.

- Promote Navitas to potential students and attract them to study in Australia and internationally.
- Capture students in their academic, social and city environments.
- Showcase the student experience available within Navitas, as well as the facilities on offer within our campuses.

- Celebrate and demonstrate international student diversity across Navitas.

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.

- Website
- Social media
- Offline advertising campaigns – direct mail, billboards, posters, event stands
- Online advertising campaigns - promoted social media posts and adverts, search engine adverts, education platform adverts
- Promotional brochure
- Promotional flyers
- Promotional event banners
- Promotional presentations to prospective students
- 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. 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 may 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
- Article 9 condition for lawful processing of ethnicity in photographs – Explicit consent.

5. How long do we keep your Personal Data?

All images taken with your consent will be kept and used for no more than the timeframe specified on your consent forms, which in this case is no more than 5 years. After 5 years we will securely delete your image and no longer use it.

6. Sharing your Personal Data

Your image may be shared within Navitas Pty Ltd and its global group of companies, including related entities, colleges and campuses, for the purposes described above.

Where you consent to use by university partners, your image may also be shared with those partners for co-branded marketing purposes.

Where you consent to social media use, your image will be shared with the selected platforms, who will process your data in accordance with their own privacy policies.

7. Processing and Transferring your Personal Data

Navitas is a global organisation with operations in multiple countries. Your personal data, including your image and voice, may be accessed and used by authorised Navitas employees across our global group of companies for the promotional purposes to which you have consented.

Your images will be stored securely within Navitas' approved digital asset management and marketing systems. Access will be restricted to authorised personnel who require access for marketing, recruitment and promotional activities.

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 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.

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