

New Zealand Language Centres (NZLC) Ltd Privacy Policy

PERSONAL INFORMATION:

Your personal information is being collected by New Zealand Language Centres Limited. We are committed to being open and transparent about how we manage personal information. We only collect, store, use and disclose your personal information in accordance with our Privacy Policy. This policy applies to anyone submitting personal information (including enrolment applications) to us or using our services. By providing personal information to us or using our services, you agree to the terms of our Privacy Policy. If you do not agree to the terms of our Privacy Policy, we will not be able to provide you with our services.

Our Privacy Commitment: We are committed to being open and transparent about how we manage your personal information. Our Privacy Policy aims to communicate, in the clearest way possible, how we treat your personal information. We encourage you to read this Privacy Policy carefully. It will help you make informed decisions about sharing your personal information with us. At New Zealand Language Centres ("NZLC") we have a few fundamental principles:

- We will always collect, store, use and disclose personal information in accordance with all applicable privacy laws. However, we have also put in place this Privacy Policy to protect personal information you submit or we collect.
- We will only use your personal information when it is necessary for us to deliver our services or perform other necessary business functions and activities.
- We will not use or disclose your personal information for purposes unrelated to our business activities and the services we provide, unless we first obtain your consent.

Privacy Policy: This Privacy Policy sets out how we comply with our privacy obligations under the Privacy Act 1993 (New Zealand) and European Union General Data Protection Regulations. We are bound by the requirements of those laws, which regulate how we may collect, store, use and disclose your personal information. Those laws also specify other requirements, such as how individuals may access, correct and delete information held about them. When we say "personal information" we mean identifiable information about you, such as your name, email, address, telephone number, qualifications and so on. When we say "sensitive information" we mean a special category of personal information containing information regarding racial or ethnic origin, religious beliefs or special categories of personal information that merits higher protection such as health information and information relating to children. In this Privacy Policy "we", "us" and "our" and "NZLC" collectively refers to New Zealand Language Centres Limited and its related companies and affiliates.

Your Consent: NZLC is an NZQA (New Zealand Qualifications Authority) rated Category 1 School that provides a range of education related services specialising in language education. Our business relies on the collection of personal information that is submitted by you, or with your authority, to enable us to better assess your suitability and eligibility for enrolment at one of our language centres and to provide such education and support to you on an ongoing basis ("Services"). By using our Services or providing your personal information to us, you consent to our collection, storage, use and disclosure of your personal information (and any sensitive information you provide) in accordance with this Privacy Policy.

Changes to this Privacy Policy: We may amend the terms of this Privacy Policy from time to time, and will notify you of any changes by posting an updated version on our website or by sending you a notice via email. It is your responsibility to check this Privacy Policy periodically for changes, and to keep your email address current. Your continued use of our Services following notification of any changes to this Privacy Policy constitutes acceptance of those changes. If you do not agree with any aspect of the updated Privacy Policy, you must immediately cease all use of our Services.

WHAT INFORMATION DO WE COLLECT?

Information you provide to us directly: Our usual practice is to collect personal information directly from you, when you complete any form, including our physical or online enrolment forms, register or apply to use our Services, or provide any other information in connection with your use of our Services. A few examples include:

- Personal details: given name(s); photograph; education background; passport number; travel and insurance details; visa status; health information, and other typical content provided as part of an application process.
- Demographic information: gender; date of birth; age; nationality; title; language.
- Contact details: correspondence address; telephone number; email address.
- Consent records: records of any consent you may have given and the subject matter of that consent.

Sensitive information you provide: We may collect or obtain sensitive information and personal information that merits higher protection directly from you (for example, information relating to a child (under 18 years of age) or your application contains health information).

Information we get from third parties: We collect or obtain personal information from authorised third parties (e.g. our authorised overseas retail partners, education providers, Immigration New Zealand, law enforcement agencies). This includes information such as public information, education or qualifications, references, competency or medical tests.

Information we collect automatically: We may collect personal information about you automatically when you visit our websites or use our Services, like your IP address and device type. Some of this information may be collected using cookies and similar tracking technologies.

Information we create in relation to performance of the Services: We may also create or obtain personal information, such as records about your interactions with us.

Information you make public: We may collect or obtain your personal information that you manifestly choose to make public, including via online channels such as social media (e.g. LinkedIn, Facebook etc.)

You can always choose not to provide your personal information to us, but it may mean that we are unable to provide you with the Services.

HOW IS YOUR PERSONAL INFORMATION PROCESSED?

Where we collect personal information or sensitive information, we will only process it:

- to perform a contract with you; or
- where we have legitimate interests to process the personal information or sensitive information and these interests are not overridden by your rights; or
- in accordance with a legal obligation; or
- where we have your consent.

NZLC collects your personal information so that we can provide you with the Services and any related services you may request. In doing so, NZLC may use the personal information we have collected from you for purposes related to the Services including:

- to process and administer the Services, and to help us develop, improve, manage, administer and facilitate our Services and business operations;
- to contract with authorised individuals;
- to process your personal information for NZLC's internal business purposes;
- to verify your identity and application details;
- for general internal purposes (such as record keeping, database management, training, billing);
- to assist with the resolution of any issues relating to the Services;
- to comply with all laws and regulations in all applicable jurisdictions; and
- to communicate with you.

By using the Services, you consent to your personal information and sensitive information being collected, stored, used and disclosed in this way and for any other use you authorise. NZLC will only use your personal information for purposes described in this Privacy Policy, or with your consent.

IN WHAT VERY LIMITED CIRCUMSTANCES MIGHT WE DISCLOSE YOUR PERSONAL INFORMATION?

Your personal information will not be sold, traded rented or otherwise provided to others without your consent.

We will only disclose your personal information outside NZLC and its related companies if it is necessary and appropriate to facilitate the purpose for which your personal information was collected pursuant to this Privacy Policy, including the provision of the Services, or a directly related purpose. This may include, for example, disclosure of personal information to:

- credit agencies, homestay providers, local schools, activity providers where applicable as part of your application process for the Services;
- New Zealand agencies such as Ministry of Education, NZQA, Tertiary Education Commission and Immigration New Zealand, to enable us to provide the Services; and
- third party service providers, including any sub-contractors, to enable us to provide the Services.

We will not otherwise disclose your personal information unless we believe on reasonable grounds that you have provided your authorisation. However, you should be aware that we may be required to disclose your personal information without your consent in order to comply with any court orders, subpoenas or other legal process or investigation including by tax authorities, if such disclosure is required by law. Where possible and appropriate, we will notify you if we are required by law to disclose your personal information.

INTERNATIONAL DATA TRANSFERS

When we disclose data, it may be transferred to, and processed in, countries other than New Zealand – such as Hong Kong and Singapore, where some of our data hosting servers are currently located. There may be differences with New Zealand's privacy laws. However, rest assured, where we disclose personal information to a third party in another country, we place safeguards to ensure your personal information is protected. For individuals in the European Economic Area (EEA), this means that your personal information may be transferred outside of the EEA. Where your personal information is transferred outside the EEA, it will only be transferred to countries that have been identified as providing adequate protection for EEA data (like New Zealand), or to a third party where we have approved transfer mechanisms in place to protect your personal information (e.g. by entering into the European Commission's Standard Contractual Clauses). For further information, please contact us using the details set out in the contact section below.

STORAGE AND SECURITY

We are committed to protecting the security of your personal information and we take all reasonable precautions to protect it from unauthorised access, modification or disclosure. NZLC implements and maintains security measures that are designed to provide reasonable protection against the loss, interference or misuse of your personal information and to prevent unauthorised access, modification or disclosure of that information.

WHAT ABOUT LINKS TO OTHER WEBSITES?

Our website may contain links to other websites that are not under our control. These websites may use cookies. It is the responsibility of those third parties to collect appropriate consents from you in order to permit their own cookies (to the extent this is required by law) and to inform you about the cookies they use. You should check the privacy policy on all third party websites to ensure you are comfortable with third party cookies. We have no responsibility for linked websites, and provide them solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or warranties about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

EMAIL, TEXT AND TELEPHONE COMMUNICATIONS

We are committed to full compliance with the Unsolicited Electronic Messages Act 2007. By subscribing to emails and/or text communications, or otherwise providing your email address and/or mobile number, you consent to receiving emails and/or texts (as the case may be) which promote and market our products and services, or the products and services of others, from time to time. You can unsubscribe from our email communications and/or text communications at any time by clicking the "Unsubscribe" link in any promotional or marketing email or text received or by emailing info@nzlc.ac.nz. Once you have unsubscribed from the email or text communications, you will be removed from the corresponding marketing list as soon as is reasonably practicable.

HOW YOU CAN ACCESS OR CORRECT YOUR PERSONAL INFORMATION

It is your responsibility to ensure that the personal information you provide is accurate, complete and up-to-date.

You may request access to the information we hold about you, or request that we update or correct any personal information we hold about you, or ask us to restrict or cease processing your personal information or even delete your personal information, by setting out your request in writing and sending it to us at info@nzlc.ac.nz. We will review your request as soon as reasonably practicable to comply with our legal obligations. If we are unable to give you access to the information you have requested, we will give you reasons for this decision when we respond to your request.

RETENTION

The length of time we keep your personal information depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you have requested or to comply with applicable legal requirements such as money laundering and financial reporting legislation or Ministry of Education and NZQA requirements). We will retain your personal information for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our internal retention policies and practices. Following that period, we will make sure it is deleted or anonymised. Otherwise, as a general rule, we only keep your personal information for as long as we require it for the purposes of providing you with our Services.

PRIVACY OFFICER

We take your concerns seriously. If you have any concerns about privacy or the use or collection of your personal information by NZLC please contact our Privacy Officer at info@nzlc.ac.nz and include the words 'ATT: THE PRIVACY OFFICER' or call us on 09 303 1962. We will respond as quickly as possible (our target response is 20 days) and handle all complaints in a way that is fair and consistent. However, if you remain dissatisfied, you can make a formal complaint with Office of the Privacy Commissioner.

This represents our Privacy Policy as at 25 May 2018.