



## Privacy Notice

<b>Document Name</b>	Student Retention Privacy Notice
<b>Brief Description</b>	
<b>Responsibility</b>	Heidi Podd
<b>Initial Issue Date</b>	11/23

Date	Version Number	Summary of Changes	Reviewer name & department
2023 11 02	V0.1	Initial Draft	K. Marshman - Privacy
2023 11 16	V0.2	Amendments	S. Jacobs – GM Marketing & Recruitment
2023 11 21	V1	Final Version	K. Marshman - Privacy

Information Classification: Public

V0.1



## 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)

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

As part of the college attendance process, the college will meet with you if your attendance falls below 50% or you have 6 consecutive absences. To help you keep your attendance up, and ensure your welfare whilst you are studying with one of our colleges, we will also contact your parents or agent, if your attendance is low.

- Student ID
- Student Nationality
- Student Enrolled Institution Name
- Student Enrolled Program Name
- Agency Name (if applicable)
- Student Attendance record\*

\*Student attendance record includes date of class, Module, Activity (Lecture/Support) Attendance % of class. Summarised by overall % attendance and Last week's attendance.

A threshold of 50% attendance or 6 consecutive absences results in a letter to the student and the process of exclusion begins. A meeting with the College will take place before this happens, and this process of contacting parents and agents is another attempt to resolve the attendance issue before exclusion happens.

It is also important for student welfare to ensure, especially when studying in another country, that you are well and able to attend class.

If you are not comfortable or happy for us to contact your parents or agents for the purpose of attendance, please let us know by contacting us at [privacy@navitas.com](mailto:privacy@navitas.com) and using the "Right to Object" which is a legal right under the UK GDPR.

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

Lawful basis for processing – Legitimate Interests

There is a legitimate interest assessment available on request.

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## 5. How long do we keep your Personal Data?

The data regarding attendance will be kept by the college for 1 semester. Either your attendance will improve and you will stay on at the college, or you will be unable to continue due to unforeseen absences which result in exclusion.

Where your information has been passed to the Navitas recruitment team to contact parents and agents, this information will be kept for one year.

## 6. Sharing your Personal Data

### Sharing within Navitas

Navitas is a global organisation. We have operations in many different geographic regions and our head office is in Australia, therefore, we will sometimes need to share your personal data internationally, within our business.

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).

### Sharing outside of Navitas

Only sharing outside of Navitas, and its employees, will be with parents and agents.

## 7. International Transfers of your Personal Data

International transfers will take place within Navitas, and internal sharing is covered by our Intra-Group Data Sharing Agreement which ensure your personal data is safe and meets legal requirements.

The above listed personal data will be shared with agents where they are working on your behalf. This sharing is covered by both parties, as part of our contract with agent. Any transfers of personal data will be done to South East Asia for this purpose, which is where agents are located.

Information Classification: Public Any sharing with parents is done verbally, no records will be provided.

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## 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. Depending on what lawful basis is being used to collect and process your personal data, some of the data subjects rights may not be engaged. We have greyed out those which do not apply to you for the purposes of this privacy notice.

- Right of access – Request a copy of the personal data Navitas holds on you.
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to Portability
- Right to object and automated individual decision-making
- Right to object

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

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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)