

**International Gateway Kelowna LTD.** ("International Gateway Kelowna" or "we"), in addition to its commitment to provide a stimulating and safe learning environment for visitors of all nationalities, is also committed to protecting, in accordance with applicable legislation, the accuracy, security and privacy of any personal information International Gateway Kelowna. For these reasons, we have created the following privacy policy ("Privacy Policy") which outlines how we manage your personal information and safeguard your privacy.

# Consent

BY SUBMITTING PERSONAL INFORMATION TO INTERNATIONAL GATEWAY KELOWNA OR ITS SERVICE PROVIDERS AND AGENTS, YOU AGREE THAT WE MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY LAW. In most circumstances, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting the International Gateway Kelowna Privacy Officer, however, if you do so, we may not be able to provide you or continue to provide you with certain programs, services or information which may be of value to you. If you provide International Gateway Kelowna or our service providers and agents with personal information of another individual, you represent that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

# What Personal Information do we collect?

Canadian privacy legislation defines "personal information" broadly as information about an identifiable individual or as information that allows an individual to be identified, but does not include the name, title or business address or telephone number of an employee of an organization. For the purposes of this policy, "Personal Information" means information about an identifiable individual as defined from time to time in applicable federal and provincial privacy legislation. Some Personal Information that is otherwise publicly available in not protected by applicable privacy laws.

We collect only the information required to provide products and services to you. We receive and store any information you enter on our website or give us n any other way. For example, your Personal Information includes information that relates to your educational history, academic transcripts, personal profiles, gender, nationality, languages spoken, information contained in your application for our programs or your study permit or visa, an unlisted address or phone number, an identifying number. However, some Personal Information that is otherwise publicly available in not protected by applicable privacy laws.

# Why do we collect your Personal Information?

In general, International Gateway Kelowna collects, uses and discloses Personal Information about our clients, host families and partners in order to provide our clients with the various adult and youth educational programs, language learning, tutoring, summer camps and tours we have developed and operate. International Gateway Kelowna does not sell Personal Information to any third parties.

More specifically, we collect, use and disclose Personal Information for the following purposes:

- to assist you with your application for any of our programs, including obtaining the necessary legal guardianship, study permits, immigration and Visa approvals;
- to evaluate you for placement in, and assist with registration and enrollment with International Gateway Kelowna affiliated public and private high schools in Canada;
- to develop, enhance, market, administer or otherwise provide International Gateway Kelowna' services;
- to distribute our newsletters, information and other materials to individuals on our mail and e-mail lists;
- as permitted by, and to comply with, any legal or regulatory requirements or provisions; and for any other purpose to which you consent.

# To whom do we disclose your Personal Information?

From time to time, International Gateway Kelowna may disclose your Personal Information to:

- students requesting homestay placement, schools and school administrators, consulates and government agencies, agents, residential providers and homestay families, and third party service providers, including organizations or individuals retained by International Gateway Kelowna to perform functions on its behalf;
- a person who, in the reasonable judgment of International Gateway Kelowna is providing or seeking the information as your agent; or
- any third party or parties, where you consent to such disclosure or where disclosure is required or permitted by law.

# Where do we store your Personal Information?

Your Personal Information is stored in secured locations and on servers controlled by International Gateway Kelowna, located either at our offices or at the offices of our service providers.

# How may you obtain access to your Personal Information?

Upon your written request, subject to certain exceptions, International Gateway Kelowna will inform you of the existence, use and disclosure of your Personal Information and will give you access to that information. You may inform International Gateway Kelowna in writing of any changes requiring to be made with your personal information. Once informed by you, International Gateway Kelowna will make all reasonable efforts to update, correct and remove any outdated or incorrect information. Access and correction requests should be sent to our Chief Privacy Officer, using the contact information below.

## **Retention of Personal Information**

We retain personal information in our records for as long as necessary to fulfill the intended purposes or a legal or business purpose.

## **Privacy and our Website**

- In order to provide our website visitors with information, visitors may voluntarily submit Personal Information to us for purposes such as asking a question or obtaining information. You should be aware that e-mail is not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information.
- International Gateway Kelowna does not use cookies nor does International Gateway Kelowna use any electronic means to automatically collect personal information from you or your computer. However, International Gateway Kelowna 's web servers will automatically collect IP addresses and we may view our web server IP log from time to time to prevent fraudulent acts and possible network attacks.
- The only personal information International Gateway Kelowna collects via the website is the information voluntarily supplied by you if you contact International Gateway Kelowna via the Website.

## **Google Analytics**

Through Google Analytics, International Gateway Kelowna can track location of website traffic and the source of our visitors browsing (desktop, tablet, mobile etc.) as well as the total time spent on the Website. IP addresses, URLs visited, and related information is recorded for all site visitors for the purpose of site traffic analytics and captured as part of normal operation in our server logs. Cookies are used to track logins, sessions, and collect anonymous traffic data.

This information is used to understand our audiences, including where they are from, what they are looking for and how we can best assist them. This information allows International Gateway Kelowna to stay in tune with our audiences and helps to improve our online user experience.

# **Changes to the Privacy Policy**

International Gateway Kelowna reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such changes on our website and make such revised policy and changes available upon request to the International Gateway Kelowna's Privacy Officer.

#### Further Information

For information on International Gateway Kelowna's privacy practices, please contact its Privacy Officer at:

## **International Gateway Kelowna Chief Privacy Officer**

618 Bernard Avenue, Kelowna, British Columbia, Canada, V1Y 6P3,

Email: info@igcanada.com