

PRIVACY POLICY

Last Updated January 4, 2021

International Gateway Kelowna respects your privacy and is committed to protecting your personal data. This privacy notice tells you how we collect, use, and disclose personal data, how we look after your personal data when you visit our websites (regardless of where you visit from) and tells you about your privacy rights and how the law protects you.

PURPOSE

This privacy notice aims to give you information on how International Gateway Kelowna collects and processes your personal data, including any data you may provide through this website when you:

- Arrive on our website from a social media site
- Complete a callback/inquiry form;
- Register on our site
- Sign up for marketing materials; or

You provide us with your personal data by any other means.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This privacy notice supplements the other notices and does not replace them.

1. IMPORTANT INFORMATION AND WHO WE ARE

This privacy notice is issued on behalf of the International Gateway Kelowna group of companies so when we mention, "International Gateway Kelowna", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in International Gateway Kelowna Group responsible for processing your data. When you apply for programs, courses or otherwise purchase a product or service with us, the controller will be the name of the institution that you are registering with, unless otherwise indicated in writing to you in the application process. However, when you are just browsing our websites, the relevant data controller is International Gateway Kelowna, unless specifically mentioned otherwise on a particular website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact Details:

International Gateway Kelowna

618 Bernard Avenue, Kelowna, BC, V1Y 6P3

+1-250-860-2252



info@igcanada.com

We would always prefer that you come to us to help address any concerns of a privacy nature however before you go to the ICO or other applicable supervisory authority, so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on January 4, 2021 and historic versions can be obtained by contacting us.

We may from time to time change the detail in this notice. Any changes we may make in the future will be posted on this page. Please check back frequently to see any such updates or changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that individual can be identified. Anonymous data is therefore not treated as personal data.

We have grouped together with different kinds of personal data, which we may collect, use, store and transfer as follows:

Academic Data includes eligibility data including education and academic history, training records, qualifications, personal statements, CVs, personal achievements and references.

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, Unique Learner Number, nationality, residency status, disability declaration, criminal conviction declaration, third-party student reference number where that third party shares your data with us, (e.g. UCAS, HESA and similar such organisations), and photographic images.

Contact Data includes billing address, term-time, and permanent residential address, country of residence, email address and telephone numbers.

Emergency Contact Data about next of kin/emergency contact names and contact details for use when there is an emergency that has involved you.

Employment Data (if you are sponsored by your employer) includes employer details, start date, end dates, NI number (or similar national identifying number), your job title, contact details at work (email address, telephone number, and postal address).

Financial Data includes student loan information, bank account, and payment card details.

Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

Profile Data includes any of your usernames and passwords, inquiries made by you, purchases or orders made by you, your interests, preferences, feedback and survey responses.

Student Data includes your term time and home address, ID photo, subject of interest, chosen International Gateway Kelowna course or International Gateway Kelowna programme (or one of our partner establishments), your progress data and your results (coursework and exam, including mocks), other results from before final study years, exam scripts and transcripts, your attendance, lecturers' and tutors' feedback on you or your staff (if you are a corporate), student references, communications with International Gateway Kelowna received by you to or from your International Gateway Kelowna email address, the extent of your use of any learning facilities / services by International Gateway Kelowna, information relating to your use of the International Gateway Kelowna library resources (including materials checked out and overdue

items), data about your membership of student groups, associations and any event attendances, information regarding mentor and mentee data, and your membership of any relevant alumni network, data around your taking part in events hosted by us or advertised by us, learner analytics and profiling data, any disciplinary data, student, course, or tutor-related complaints data and any claims involving you of any nature whatsoever, extenuating circumstances, appeals, and additional information as required by a professional/accreditation/awarding body.

Monitoring and Reporting Requirements Data includes the destination of leavers of Data reported to third parties for regulatory purposes.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

Technical Data includes your IP address, your login data, browser type, and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Usage Data includes URL data, web analytics data in relation to how you arrived at our sites, from where, what search items you looked for, which pages you visited on our sites, the duration of your visits and such other information about how you use our websites and the information provided on them, and how you use our products and services so as to assist us to improve our website offers to you.

Visa Data for international students, including passport and previous visas data, bank statements or other financial information for satisfying ourselves that visa requirements are met.

Special Category Data– When you make an application on our website for a course or program we will ask whether you have any disabilities. You are not obliged to inform us, but any information you do provide will assist us to assess how we will meet our statutory obligations in relation to your disability.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this privacy notice.

For further information please contact us at info@igcanada.com.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, or where particular personal data is necessary to provide you with a particular product or service you request, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by communicating with us by post, phone, and email or otherwise. This includes the personal data you provide when you:

Apply for our products or services;

Create an account on our website;

Use our site;

Subscribe to our service or publications;

Request marketing to be sent to you;

Enter a promotion or survey; or

Give us feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy (16. Cookies) for further details.

Third parties or publicly available sources. Where permitted by applicable law, we may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

Analytics providers such as Google analytics, Google Optimizer, Google Webmaster tools, Google tag manager, Facebook, Instagram, LinkedIn and other similar services which we will be using in the future;

Advertising networks such as Google Advertising Network, Facebook, Instagram, Bing and LinkedIn based outside the EU and similar network we will be working with; and Search information providers such as Google, Bing and other search engines based inside and outside the EU, social media networks such as Facebook, LinkedIn, and Instagram, based inside the EU and others providing similar services.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Conversant, Google Analytics, Facebook, Instagram, Bing, LinkedIn and Stripe, based outside the EU and Convertr Media based inside the UK including similar services we will partner with in future.

Student Data from staff, administrative functions of other educational establishments, mentees or mentors, complainants.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where we need to perform the contract we are about to enter into or have entered into with you.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, or where we have your consent.

Where we need to comply with a legal or regulatory obligation.

Please see the table below to find out about the types of lawful basis that we will rely on to process your personal data.

In jurisdictions where 'legitimate interests' serve as a lawful basis for processing personal data, generally, we do not rely on 'consent' as the legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or SMS. In jurisdictions where 'legitimate interests' do not serve as a legal basis for processing your personal data, where we indicate we process information based on legitimate interests, we process your personal data with your consent, which may be express, or implied, depending on the context, or where we have the lawful authority to process your information, for example, where such processing is:

Authorized by statute,

For the purposes of law enforcement, or

Necessary for the proper administration of our lawfully authorized activities.

You have the right to withdraw consent to marketing at any time by contacting us at info@igcanada.com or by clicking the unsubscribe link in the relevant emails.

5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

The manner in which we process your personal data, and the personal data we process depends on your relationship with us, and how you interact with us.

Students or prospective students

Purpose/Activity:

- To respond to your request for a call (or email) back, course inquiries, applications

Type of data:

- a) Contact Data

Lawful basis for processing including basis of legitimate interest:

- i. Performance of a contract with you (in our anticipation of entering into such contract with you)

Purpose/Activity:

- To enroll/register you as a new candidate and provide student number/identity card

Type of data:

- (a) Identity Data
- (b) Contact Data
- (c) Academic Data

Lawful basis for processing including basis of legitimate interest:

Performance of a contract with you

Purpose/Activity:

- Direct marketing of or about student benefits and opportunities, university, college, or school act professional and industrial bodies wishing to communicate with students about career opportunities.

- Promotion of university, college, or school via prospectus containing images of current students.
- Direct marketing may include cookie based remarketing services intended to deliver targeted more information, including how to opt out, please see Cookies section at the end of this policy.

Type of data:

- (a) Contact Data
- (b) Technical Data
- (c) Usage Data

Lawful basis for processing including basis of legitimate interest:

- i. Consent

Purpose/Activity:

To process your application including for the provision of services including:

- Manage payments, fees and charges
- Collect and recover money owed to us
- Accounting for VAT/tax purposes

Type of data:

- (a) Identity Data
- (b) Contact Data
- (c) Financial Data
- (d) Transaction Data
- (e) Marketing and Communications Data
- (f) Academic Data

Lawful basis for processing including basis of legitimate interest:

- i. Performance of a contract with you
- ii. Necessary for our legitimate interests (to recover debts due to us)
- iii. Consent

Purpose/Activity: To manage our relationship with you which may include:

- Notifying you about changes to our terms or privacy policy
- Provision of learning material
- Asking you to leave a review or take a survey
- Monitor attendance or any change in student status.
- Administration of appeals, complaints, and matters relating to health and conduct and to cheating
- Granting of awards
- Administration of alumni membership

Type of data:

- (a) Identity Data
- (b) Contact Data
- (c) Profile Data
- (d) Marketing and Communications Data

Lawful basis for processing including basis of legitimate interest:

- i. Performance of a contract with you
- ii. Necessary to comply with a legal obligation
- iii. Necessary for our legitimate interests (to keep our records updated and to study how students
- iv. Necessary for the candidate's legitimate interests (to receive the benefit of the award)

Purpose/Activity:

- Equal opportunities monitoring (for some but not all of our institutions), and where permitted or re

Type of data:

- (a) Gender ethnicity religion and nationality

Lawful basis for processing including basis of legitimate interest:

- i. Legal Obligation
- ii. Consent

Purpose/Activity:

- Enrolment

Type of Data:

- (a) Identity Data
- (b) Student Data

Lawful basis for processing including basis of legitimate interest:

- i. Necessary for the performance of a contract

Purpose/Activity:

- Make adjustments/accommodations to meet disability requirements / medical conditions

Type of data:

- (a) Health Data

Lawful basis for processing including basis of legitimate interest:

- i. Consent

Purpose/Activity:

- Provide health and safety first aid assistance, emergency evacuation, hazard risk assessment, ac

Type of data:

- (a) Health Data

Lawful basis for processing including basis of legitimate interest:

- i. Vital interests; Consent

Purpose/Activity:

- Emergency accident/health management

Type of data:

- (a) Emergency contact / next of kin details
- (b) Health Data

Lawful basis for processing including basis of legitimate interest:

- i. Vital interests; Consent

Purpose/Activity:

- Improvements in service offering, profiling students based on their performance and other

Type of data:

- (a) Student Data (specifically learner analytics)

Customers (or prospective customers) of online courses and published media

Purpose/Activity:

- Register new customers for online materials

Type of data:

- (a) Identity Data
- (b) Contact Data

Lawful basis for processing including basis of legitimate interest:

- i. Performance of a contract with you

Purpose/Activity:

- Process / fulfil / deliver customer order
- Manage
- payments, fees and charges
- Collect/ recover monies owed
- Accounting records
- Defence of legal claims brought against us

Type of data:

- (a) Identity Data
- (b) Contact Data
- (c) Financial Data

(d) Transaction Data

(e) Marketing and Communications Data

Lawful basis for processing including basis of legitimate interest:

- i. Performance of a contract with you
- ii. Necessary for our legitimate interests (to recover debts due to us or defend legal claims)
Necessary to comply with a legal obligation

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Clients of International Gateway Kelowna (including employer clients)

Purpose/Activity:

- To register you as a client of International Gateway Kelowna

Type of data:

- (a) Identity Data
- (b) Contact Data

Lawful basis for processing including basis of legitimate interest:

- i. Performance of a contract with you

Purpose/Activity:

- To process, fulfill and deliver our services to you
- Manage payments, fees and charges
- Collection/ recovery of monies owed
- Accounting purposes
- Defence of any legal claims brought against International Gateway Kelowna

Type of data:

- (a) Identity Data
- (b) Contact Data

- (c) Financial Data
- (d) Transaction Data
- (e) Marketing and Communications Data

Lawful basis for processing including basis of legitimate interest:

- i. Performance of a contract with you
 - ii. Necessary for our legitimate interests (to recover debts due to us or defend legal claims)
- Necessary to comply with a legal obligation

-

Suppliers to International Gateway Kelowna

Purpose/Activity:

- To register you as a supplier of International Gateway Kelowna

Type of data:

- (a) Identity Data
- (b) Contact Data

Lawful basis for processing including basis of legitimate interest:

- i. Performance of a contract with you

Purpose/Activity:

To process and receive goods/services:

- Manage payments, fees and charges
- Accounting purposes
- Defence of any legal claims brought against International Gateway Kelowna

Type of data:

- (a) Identity Data
- (b) Contact Data

- (c) Financial Data
- (d) Transaction Data
- (e) Marketing and Communications Data

Lawful basis for processing including basis of legitimate interest:

- i. Performance of a contract with you
- ii. Necessary for our legitimate interests (to defend legal claims)
Necessary to comply with a legal obligation

HOW WE USE SENSITIVE PERSONAL INFORMATION (SPECIAL CATEGORY DATA)

We take additional precautions where collecting, storing and using personal data that is considered 'special category' data. We have in place an appropriate policy document and safeguards, which we apply when processing such data.

We may process special categories of personal information in the following circumstances:

Students or prospective students**Purpose/Activity:**

To enroll you as a student we need to determine your immigration status with International Gateway Kelowna

Type of data:

Nationality data

Immigration status (information from visas and passports)

Lawful basis for processing:

Performance of a contract with you

Compliance with a legal obligation e.g. to the UK Home Office, German immigration authorities (and other immigration or related authorities)

Purpose/Activity:

To make required adjustments and necessary support for applicable learning needs

Type of data:

Disability data

Special learning needs

Lawful basis for processing:

Performance of a contract with you

Complying with our legal obligations (e.g. under the United Kingdom Equality Act 2010, or other accessibility or human rights legislation)

Explicit consent (information is voluntary)

Purpose/Activity:

Monitor student absences*

Deal with applications for mitigating circumstances

Deal with applications for interruptions of studies or deferrals

Confirm any dietary requirements

Type of data:

Medical/health data

Doctors' notes

Medical Records (potentially)

Lawful basis for processing:

Performance of a contract with you

Explicit consent (this information is voluntary)

*Sometimes a visa will stipulate that a student must keep a minimum attendance level; in this case, we will ask for medical evidence to support absence and thus to avoid breaching our obligations to the UK Home Office or other applicable regulators.

Purpose/Activity:

To monitor and report on equal opportunities

Type of data:

Data relating to race and ethnic

Lawful basis for processing:

Compliance with a legal obligation

Consent

The above information may also need to be used using the lawful basis of pursuant to a legal claim or to protect your interests (or someone else's interests) (where you are not capable of giving your consent (for example if you suffer a medical problem preventing your ability to communicate)).

7. YOUR CONSENT

It is not a condition of becoming a student with us that you give us consent for any type of processing that is not reasonably necessary for you to be a student. However, should you choose not to give consent, then you may not benefit from certain support services for example.

We do not need your consent in circumstances where our processing of personal data is required by applicable law, there is an exception to the need for your consent, or we use special categories of your data in accordance with our legal obligations (and we set this out in our written policies).

On rare occasions, we may ask for your explicit (written) consent to use certain special categories of data. If we do this we will make sure you have a detailed explanation of the data we need and why. This will enable you to make an informed decision whether you wish to consent.

8. HOW WE USE PERSONAL DATA FOR PROMOTIONAL PURPOSES

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We will always give you options to determine how we use your personal data in this regard.

Promotional offers from us

You may receive marketing communications from us if you have requested information from us or purchased products or services from us or if you provided us with your details when you fill out a survey or feedback form, and, where required by applicable law, provided your consent to receive such materials, and, in each case, you have not opted out of receiving that marketing.

Opting out

You can unsubscribe from marketing messages at any time by following the opt-out / unsubscribe links on any marketing message sent to you at any time or by contacting the admissions team.

Where you opt out of receiving these marketing messages, this will not stop us storing your data provided to us as a result of applying for a course or program or buying some other service or materials from us.

9. CHANGES TO OUR PRACTICES

We will only use your personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our DPO.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis, which allows us to do so, and where required by law, will obtain your consent to the new purpose.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

10. DISCLOSURE OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Internal Third Parties as set out in the Glossary.

External Third Parties as set out in the Glossary.

Specific Third Parties identified in the Glossary.

Third parties, to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

We share your personal data within the International Gateway Kelowna Group. This will involve transferring your data outside the European Economic Area (EEA), or your jurisdiction of residence, including Canada. Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data

out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

Where we use certain service providers, we may use specific contracts approved by the European Commission, which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield, which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

You have explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for you due to the absence of an adequacy decision and appropriate safeguards.

The transfer is necessary for the performance of a contract between you and us as the data controller or for the implementation of pre-contractual measures taken at your request.

The transfer is necessary for the conclusion or performance of a contract concluded in your interests between us as the data controller and another natural or legal person.

The transfer is necessary for important reasons of public interest.

The transfer is necessary for the establishment, exercise or defense of legal claims.

The transfer is necessary in order to protect your vital interests or the vital interests of other persons, where you are physically or legally incapable of giving consent.

The transfer is made from a register which according to Union or Member State law is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down by Union or Member State law for consultation are fulfilled in the particular case.

If you are a resident of Canada, some or all of the personal data we collect may be stored or processed on servers located outside your jurisdiction of residence, including

in the United States, and the EEA, whose data protection laws may differ from the jurisdiction in which you live. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions. Subject to applicable laws in such other jurisdictions, we will use reasonable efforts to ensure that appropriate protections are in place to require the data processor in that country to maintain appropriate protections on your personal data.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data.

12. DATA SECURITY

We have put in place appropriate security measures to help prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. The personal data we collect is managed from our offices in Toronto.

In addition, we limit access to your personal data to those employees; agents, contractors and other third parties who have a business need to know, as described in this privacy policy. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

13. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances, we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

14. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Request access to your personal data

You have the right to access your personal data (known as an “access request”). This enables you to receive a copy of the personal data we hold about you and check that we are lawfully processing it.

To make a request: If you wish to make a request for access to your information, please contact us at International Gateway Kelowna, 618 Bernard Avenue, Kelowna, BC Canada, V1Y 6P3 or by email at info@igcanada.com;

No fee usually required: You will not have to pay a fee to access your personal data (or to exercise any of the other rights), although we have the right to charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, if permitted by applicable law, we may refuse to comply with your request in these circumstances, or in other circumstances permitted by the applicable law.

What we may need from you: We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to help ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond: We try to respond to all legitimate requests within one month from the date your access request is received. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Request correction of your personal data

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or

remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data

You may raise an objection to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, which override your rights and freedoms.

Request restriction of processing your personal data

You may request to restrict our processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data

You may exercise your right to transfer your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to withdraw consent

This applies only where we rely on your consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

In certain circumstances, you can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also contact us at info@igcanada.com if you wish to exercise your rights.

If you wish to exercise any of the rights set out above, please contact us.

15. GLOSSARY

Lawful Basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you our best service/product and our best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting our DPO.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take preliminary pre-contractual steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third Parties

Internal Third Parties

Other companies in the International Gateway Kelowna Group acting as joint controllers or processors and who are based throughout the world and provide shared services such as IT, legal services, system administration services, and leadership reporting.

External Third Parties

Service providers acting as processors based in the UK, Belarus, Spain, and America who provide IT and system administrations services, or otherwise assist us in carrying out the purposes described in this privacy policy.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based throughout the world who provide consultancy, banking, legal, insurance, and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom and other countries who require reporting of processing activities in certain circumstances.

Employers who request a reference from International Gateway Kelowna External Examiners for examination, assessment and moderation purposes

Awarding body partners – in order to process the administration of student enrolment onto programs

Professional/Funding bodies, Student Loans company(ies) or providers

Market Researchers

Other universities, employers, prospective employers, providers of training contracts or pupillages

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Please note that third-party sites, which are linked to on our site, may also use cookies, over which we have no control.

International Gateway Kelowna LTD.

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