

Privacy Policy

EduCo International is committed to providing quality services and this policy outlines our ongoing obligations in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <u>www.oaic.gov.au</u>.

By using our websites, applications and services, or otherwise providing us with your information, you consent to us collecting, holding, using and disclosing your personal information as described in this Policy. If we are not able to collect, handle, use and disclose personal information about you as set out in this Policy, we may not be able to provide you with our services or with access to our websites or applications.

What is Personal Information and why do we collect it?

Personal Information is information or an opinion about an identified individual or an individual who is reasonably identifiable. Examples of Personal Information we collect include: names, addresses, email addresses, personal preferences, payment details, employment history, education and qualifications, testimonials and feedback, phone and facsimile numbers, and other information which assists us in conducting our business, providing and marketing our services and meeting our legal obligations. In some cases we may also collect 'sensitive information' as described below.

This Personal Information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, via our websites <u>www.educoglobal.com and</u> www.educoaccelerate.com, from your website, from media and publications, from other publicly available sources, from cookies and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual' s racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.



Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Links to other websites

We may provide links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. If you visit these websites, they will be governed by their own terms of use (including privacy policies).

We may also collect and process non-personal information provided to us by your browser when you visit our websites or use our applications, for example, the website you came from, your location information, IP and MAC address, web browser and/or device type. operating system and firmware of your device, and the time and date of access.

We may also use 'cookies', 'web beacons' and other similar tracking technologies to help us track your website usage and remember your preferences, For further information about the types of cookies we use, why, and how you can control Cookies, please see our Cookie Policy, www.educoaccelerate.com

Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

Your Personal Information may be disclosed in a number of circumstances to the following overseas recipients:

- to other members of the EduCo Group (including those members located in the UK, China, Singapore, Australia, Canada, Ireland, the USA and locations of our partner institutions
- to our partner institutions and universities located outside of Australia;
- entities who assist us in providing our services (including hosting and data storage providers including those located in India, China, the USA and Singapore
- to anyone else to whom you authorise us to disclose it; and
- where required or authorised by law.

Security of Personal Information



Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

EduCo will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Policy Updates

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. The most current version of this Policy is located at www.educoaccelerate.com and can also be obtained by contacting our Privacy Officer at support@educoaccelerate.com and can also be obtained by contacting our Privacy Officer at support@educoaccelerate.com and can also be obtained by contacting our Privacy Officer at support@educoaccelerate.com and can also be obtained by contacting our Privacy Officer at support@educoaccelerate.com and can also be obtained by contacting our Privacy Officer at support@educoaccelerate.com and can also be obtained by contacting our Privacy Officer at support@educoaccelerate.com and can also be obtained by contacting our Privacy Officer at support@educoaccelerate.com and can also be obtained by contacting our Privacy Officer at support@educoaccelerate.com and can also be obtained by contacting our Privacy Officer at support@educoaccelerate.com and can also be obtained by contacting our Privacy officer at support@educoaccelerate.com and can also be obtained by contacting our privacy officer at support@educoaccelerate.com and can also be obtained by contacting our privacy and can also be obtained by contacting our privacy and can also be obtained by contacting our privacy and can also be obtained by contacting our privacy and can also be obtained by contacting our privacy and can also b

Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy please contact our Privacy Officer at <u>support@educoaccelerate.com</u>. We may ask you to lodge your complaint in writing. Any complaint will be investigated by the Privacy Officer and you will be notified of the making of a decision in relation to your complaint as soon as is practicable after it has been made, usually within 30 days.

If we are unable to satisfactorily resolve your concerns about our handling of your personal information, you can contact the Office of the Australian Information Commissioner:

GPO Box 5218 Sydney NSW 2001



Email: enquiries@oaic.gov.au Tel: 1300 363 992 www.oaic.gov.au

Application of European privacy laws

If you are an individual in a country in the European Economic Area (EEA), we may be required to comply with the EU General Data Protection Regulation 2016/679 (the GDPR) which applies to us when processing the personal information of individuals (data subjects) who are in countries in the EEA in relation to offering you our products or services or if we monitor any of your behaviour when in those countries. You can read our GDPR Collection Notice here www.educoaccelerate.com. This includes additional information we are required to tell you about in relation to your privacy, including the basis on which we collect your personal information and your data subject rights under the GDPR.

EduCo International is a data controller for our website and services provided through our website at the address shown above.

Definitions

In this Policy:

EduCo International means EduCo International Pty Ltd (ABN 17 603 730 043):

- we, us, our and EduCo means the EduCo Group.
- EduCo Group means EduCo International Pty Ltd (ABN 17 603 730 043);
- EduCo Accelerate Pty Ltd (ACN 645 537 328) ('Accelerate'),",

Last updated: November 2020