

INTO Suffolk University Privacy Policy

CONTENTS

Clause	Page
1. Important Information And Who We Are.....	2
2. The Information We Collect About You.....	3
3. How Is Your Personal Information Collected?	4
4. How We Use Your Personal Information	4
5. Disclosures of Your Personal Information	6
6. International Transfers	7
7. Information Security	7
8. Information Retention	7
9. Your Legal Rights	8
10. What Happens If I Choose Not To Provide My Personal Information?	9
11. How To Contact Us	9

Effective Date: August 31, 2018

Introduction

INTO Suffolk University is a joint venture between Suffolk University (the "University") and a member of the INTO University Partnerships Group, which is made up of different legal entities that include recruitment and marketing operations (the "INTO Group"). This privacy notice is issued on behalf of the INTO Suffolk University, so when we mention "we", "our" or "us" in this privacy notice, we are referring to INTO Suffolk University. We respect your privacy and are committed to protecting your personal information. This privacy notice will inform you as to how we look after your personal information and tell you about your privacy rights and how the law protects you.

By using our services, you acknowledge that you have read and understood the terms of this privacy notice, including how we use your personal information. Please click on one of the links above to find out more information. Protecting the privacy of young children is especially important to us. For that reason, we do not knowingly collect or maintain personal information or non-personally identifiable information from users under 16 years of age, other than as permitted by law in support of our internal operations.

We reserve the right to update this privacy notice at any time by changing it as it applies to your use of our services.

1. Important Information and Who We Are

Purpose of This Privacy Notice

Your trust is very important to us and this privacy notice aims to give you information on how we collect and process your personal information.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide to you on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your information. This privacy notice supplements the other notices and is not intended to override them.

Controller

The data controller is responsible for the collection and processing of your personal information. The data controller will be INTO Suffolk University with offices at 73 Tremont Street, 4th Floor, Boston, MA 02108.

It is important to us that the personal information we hold about you is accurate and current. Please contact us if your personal information changes during your relationship with us.

If you have any questions about this privacy notice, please contact us as specified in the “How to Contact Us” section below.

Third-Party Links

Our websites 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 information 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 Information We Collect About You

Depending on which services you use, we collect different kinds of information from or about you. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include information where the identity has been removed (anonymous information).

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

- **Identity Information** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Information** includes home address, term time address, email address and telephone numbers.
- **Education Information** includes your educational history.
- **Compliance Information** includes details regarding your visa.
- **Financial Information** includes bank account and payment card details.
- **Transaction Information** includes details about payments to and from you and other details of the services you have purchased from us.
- **Profile Information** includes your username and password, courses selected by you, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Information** includes your preferences in receiving marketing from us and related third parties and your communication preferences.
- **Special Categories of Personal Information** includes details about your ethnic origin, your health or disabilities, or any criminal convictions that we may receive from you.

3. How Is Your Personal Information Collected?

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

- **Information you provide.** You may give us information including your Identity, Contact, Education, Financial, and Special Category Information either in hard copy or online, when you enroll, or by corresponding with us. This includes personal information you provide when you:
 - confirm your acceptance to study with us and/or the University;
 - enroll in your course(s);
 - request marketing material be sent to you;
 - take part in a survey; or
 - give us feedback or get in contact with us.
- **From websites and apps that use our services.** As you interact with our websites, we may automatically collect Technical Information about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies. To find out more about the way we use cookies and similar technologies please visit our [Cookies Policy](#).
- **Third parties or publicly available sources.** We may receive personal information about you from various third parties including Technical Information from analytics providers and search information providers; Contact, Financial and Transaction Information from payment providers who administer payments from you on our behalf; Identity, Contact and Education Information from your current university; and Compliance Information from regulatory agencies including applicable visa and immigration authorities.

4. How We Use Your Personal Information

We are passionate about ensuring the success, and transforming the lives, of our students. We will use your information to help us ensure that we provide, improve and develop our services for you.

We need to have a valid reason to use your personal information. This is called the "lawful basis for processing". Sometimes we might ask your permission for us to do something with your personal information: for example, when you give your consent to allow us to contact you by email about a new service we are providing. At other times, we don't need to ask your explicit permission because we have a lawful basis for processing your personal information, and you might reasonably expect us to use your personal information. For example, in administering your course and marking your assignments or transferring your information to the University, we would be performing our part of the contract we have with you.

Collected information may be processed in the following ways:

- Where we need to perform the contract we are about to enter into or have entered into with you in respect of the course(s) for which you have applied.
- Where it is necessary for our legitimate interests, and your interests and rights do not override those interests: for example, to allow us to carry out an internal analysis of our customers to inform and formulate our future strategies.
- Where we need to comply with a legal or regulatory obligation: for example, to comply with statutory reporting or any new legislation or regulatory requirement.
- Where processing is necessary to protect your vital interests or those of another individual.
- In limited instances where we have expressly requested, and you have expressly provided, your consent to the particular processing.

We will only use your personal information 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 more information on the basis on which we process your personal information you can contact us at privacy.intoSUF@intoglobal.com.

We use the information we have to deliver and improve the services we offer to you. Examples of the services offered, and how we use your personal information, includes the following:

1. to register you as a new student when you enroll in your course;
2. to teach you and mark your assignments;
3. to process and fulfill your accommodation request;
4. to assist you in your progression to the University;
5. to collect and process any payments you may owe;
6. to deliver our services to you and to provide you with information about them, including letting you know about any new offers, courses and services which may be of interest to you;
7. to enable you to participate in any surveys or any other promotions we may be running;
8. to administer and protect our business and our websites
9. to deal with any enquiries or complaints from you; and
10. to deal with any requests from you, including any regarding your rights under this notice.

Automated Decision-Making

Assumptions are made about your interests depending on the information you have supplied to us about yourself, and about the website you were visiting when you did so. For example, if you enquired about a Foundation course at Oregon State University, we assume you may be interested in pre-university education in the United States.

We also assume you speak certain languages based on your nationality or country of residence. If you require any further information regarding any automated decision making please contact us as provided below.

Marketing

We aim to provide you with choices regarding how we contact you, around the marketing and advertising of our services.

Promotional Offers from Us

We may use your Identity, Contact, Technical, Usage and Profile Information to form a view on what we think you may want or need, or what may be of interest to you: for example, in respect of a new course that is being offered or a new promotion that we are running. We conduct surveys and research and analyze the information that we have in order to evaluate and improve existing products and services and develop new products or features.

You will receive marketing communications from us if you have requested information from us or purchased services from us; and, in each case, you have not opted out of receiving communications from us.

Cookies

We use cookies and similar technologies to provide and support our services. Please read our [Cookies Policy](#) to learn more.

5. Disclosures of Your Personal Information

We may share your personal information with other members of the INTO Group. We may also share your personal information with selected third parties including:

- the University in which you wish to enroll;
- accommodation providers, if you have requested that we provide accommodation for you while you are studying with us or the University;
- education counsellors who you have instructed or engaged to act on your behalf;
- third party suppliers, service providers and sub-contractors who perform any services for us: for example, payment processing companies who process your payments on our behalf; technology companies whose systems we use; or third parties who provide services to carry out marketing campaigns on our behalf;
- analytics and search engine providers that assist us with the improvement and optimization of our websites;

- third parties with whom we have a duty to disclose, for example, where disclosure is necessary due to a legal process or an enforceable governmental request, such as a request from applicable visa and immigration authorities; or third parties we need to share your personal information with if we need to protect you or other people from harm; and
- third parties to whom we may choose to sell, transfer or merge part of our business to or with. Alternatively, we may seek to acquire other businesses or merge with them.

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

6. International Transfers

The information we collect about you was collected from you by us in the United States, since that is where we, our staff, and the University to which you are applying are based. We may also have been provided with information about you and your application originally collected from you by INTO University Partnerships Limited of One, Gloucester Place, Brighton, East Sussex, BN1 4AA, England; and IUP 2 LLP also of One, Gloucester Place, Brighton, East Sussex, BN1 4AA, England, as controllers in common ("INTO EU"). The information from INTO EU will be transferred from the European Economic Area (the "EEA") to us in the United States. It is necessary for the performance of your application and for the duration of your study with us that your personal information is transferred, stored and processed in the United States. By submitting your personal information to us you acknowledge and agree to these arrangements.

7. Information Security

We place great importance on the steps we take, including use of different technologies and physical and organizational measures, to protect your information from unauthorized access and against unlawful processing, accidental loss, alteration, disclosure, destruction and damage.

The confidentiality of any password that enables you to access certain parts of our websites is your responsibility, whether we have given you the password or you have chosen it yourself. This includes access to "My INTO". We ask you to please not share your password with anyone. We will not be liable for any unauthorized transactions entered into using your username, personal information and/or password.

8. Information Retention

How long will you use my personal information for?

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, accounting, or reporting requirements: for example, any reporting

requirements we have to comply with for US taxation, visa, and immigration requirements. We may also retain it for a period after this time as may be necessary and relevant to our legitimate operations.

In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) for statistical purposes, in which case we may use this information indefinitely without further notice to you. We may also retain a record of your stated objection to the processing of your information, including in respect of an objection to receiving communications, for the sole purpose of ensuring that we can continue to respect your wishes to not contact you further, during the term of your objection.

9. Your Legal Rights

You have a number of rights in relation to your personal information under data protection law, including, the right to:

- Request access to your personal information;
- Request the correction of your personal information;
- Request erasure of your personal information;
- Object to the processing of your personal information;
- Request the restriction of processing of your personal information;
- Request the transfer of your personal information; and
- Withdraw your consent.

If you wish to exercise any of the rights set out above, or require further information about any of those rights, please contact us as provided below. We will need to request specific information from you in order to be able to deal with your request. This is a security measure designed to ensure that your personal information is not disclosed to any person who has no right to receive it. We will confirm the specific information required from you when you contact us. We may also contact you to ask for further information in relation to any request you make in order to speed up our response.

In most instances, you will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive; alternatively, we may have no obligation to, and thus not comply with your request in these circumstances.

Time Limit to Respond

We aim to respond to all legitimate requests as soon as possible and within one calendar month of receipt. 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.

Your California Privacy Rights

California Civil Code Section 1798.83 permits residents of the State of California to request from certain businesses with whom the California resident has an established business relationship a list of all third parties to which the business, during the immediately preceding calendar year, has disclosed certain personal data for direct marketing purposes

We are only required to respond to a customer request once during any calendar year per person. To make such a request you should send an email to privacy.intoSUF@intoglobal.com with the subject heading "California Privacy Rights." In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Requests are free of charge.

Please be aware that not all information sharing is covered by the California privacy rights requirements and only information on covered sharing will be included in our response. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this section.

10. What Happens if I Choose not to Provide my Personal Information?

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to offer you a place on your requested course or provide your requested accommodation). In this case, we may have to cancel the service you have with us, but we will notify you if that is the case.

11. How to Contact Us

If you have any questions or comments about this privacy notice, please contact us as indicated below:

Email: privacy.intoSUF@intoglobal.com

By Mail:

73 Tremont Street
4th Floor
Boston, MA 02108
USA