

# GRADUATE GUIDANCE GROUP

## PRIVACY NOTICE – UPDATED JANUARY 2022

### INTRODUCTION

The Graduate Guidance Group (G3) is committed to protecting the privacy and security of your personal information. For this reason, we want to take the time to inform you about the personal data we collect from you. This Privacy Policy contains all you need to know about how we collect, use, transfer, and disclose your data. All our procedures are aligned with the General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR). If you have any questions, please contact us via our email address below.

#### 1. Who are we?

Graduate Guidance Group (G3) is an education and careers consultancy that provides free, impartial, comprehensive, and friendly counselling and application services for international students wishing to study abroad and develop their careers. G3 brings together experienced advisors with first hand experience of travelling and studying abroad and are best placed to assist students to meet their study and career goals. We not only assist with admissions and pre-departure advice, but we also keep in touch and follow your career journey after graduation.

Please read this privacy notice carefully and contact our data protection officer if you have any questions about our privacy practices or your personal information choices.

#### Contact Information

E-mail: [admin@graduateguidancegroup.com](mailto:admin@graduateguidancegroup.com)

#### 2. What information is collected and how?

G3 is committed to the responsible handling and protection of personal information which we will hold as a result of your interactions with us (this can include phone, email or text conversations, submitting enquiries on our website or attending events we organise).

Personal data, or personal information, means any information about an individual from which that person (a “Data Subject”) can be identified. It does not include data where the identity has been removed (anonymous data). The information will be personal data if a person can be identified either directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

The categories of personal information that we may collect, store and use about you include (but are not limited to):

- Name, address(es), telephone number(s), email.
- Your country of birth, nationality and place of residence.

- Date of birth and gender.
- Any disability/access requirements or medical issues.
- Your potential course details.
- School records and qualifications.
- Communications relating to organisations you are interested in
- For international students - passport details, details of previous study and previous visa information or government-issued identification number.
- Bank statements or utility bills may be requested for verification purposes.
- Images in photographs or films and recordings.

We collect, use, disclose, transfer, and store personal information to provide Services to you and for our operational and business purposes as described in this statement. We want to be clear about our privacy practices so that you are fully informed and can make choices about the use of your information, and we encourage you to contact us at any time with questions or concerns.

G3 will never share your contact information unless you have given us consent to do so or we have a lawful right to do so. If you change your mind about your consent for us to share your information and we have already shared it with universities/institutions/employers, you can opt out by contacting us at the contact information listed in clause 1.

G3 requests that all universities/institutions/employers treat your contact information securely and in accordance with this Privacy Policy, and we will take reasonable steps to enforce this. If you identify that the content you receive from those institutions differs from the purpose of providing relevant information of the universities/institutions of your interest, please report this situation to us and we will take the corresponding corrective actions.

### 3. Physical and online events

If you choose to register for any of our in person or online events and information sessions, personal data about and on behalf of you will be processed. Basic contact details are collected such as full name, e-mail address, phone number, gender, preferred language, country of interest for studying, and course of interest.

The purpose of the events is to provide relevant information about the universities/institutions/employers of your interest. By registering and attending our events you consent and agree that G3 may share your contact information with those organisations of interest to you. Therefore, those organisations may send you related information and marketing communication.

#### Photo and Video Disclaimer

Please note that photographs and videos will be taken throughout our events. By joining the events, you consent to photography, audio recording, video recording, and its/their release, publication, and/or reproduction. This content might be used for promotional purposes, advertising, inclusion on websites, social media, to promote similar events. To

ensure the privacy of individuals, images and videos will not be identified using full names or personal identifying information without written approval.

#### 4. How the information is used?

Our purpose is to assist support and guidance for study and career options. The information collected will be used for the following purposes:

- To provide you with information on products or services that you may request from us, or which we feel may be of interest to you, and where you have given consent for us to contact you for such purposes. We may use your personal information to better personalise communications to you.
- To carry out our contractual obligations with you which will include the operation and delivery of any services you have requested, deal with requests and enquiries in relation to your applications and enquiries.
- Where it is necessary to comply with a legal obligation.
- To provide management statistics through research using applicant data which may be used by G3 to enhance the applicant and student experience.
- Where you have agreed for the purpose of consulting, informing and gauging your opinion about our products and services, for example; surveys.
- To ensure we meet our statutory obligations, including those related to diversity and equal opportunity.
- To communicate with you and notify you about changes to our services.
- Necessity to perform tasks carried out in the public interest and otherwise to pursue our legitimate interests – this includes use of your personal information to improve the services we offer as a service organisation
- Analysing web behaviour – we may use your personal information to recognise web visitors on and off our digital to improve experiences, analyse marketing activities, understand audiences, and personalise content for our Digital Services, applications and advertising.
- Internal data matching – to enable us to merge certain types of data collected by G3 identify known and unknown users and map interactions with our digital services to CRM platforms and applications, for purposes of personalising content, understanding audiences, analysing marketing performance and targeting advertising.
- External data matching – to match customer lists with online platforms (e.g. through applications such as Facebook Custom Audiences and Google Customer Match) to target and tailor advertising, understand audiences and analyse marketing activities.

Our third-party service providers: We partner with and are supported by service providers both in the UK around the world. Personal information will be made available to these parties only when necessary to fulfil the services they provide to us, such as registering, required pre-course information, direct marketing services; advertising; data analytics and delivery. Our third-party service providers are not permitted to share or use personal information we make available to them for any other purpose than to provide services to us.

If you change your mind about us using your Personal Information in the ways described in this Policy, please let us know by contacting us at the contact information in this Privacy Policy.

You may also opt-out of receiving marketing emails from us by following the instructions outlined in any marketing email you receive from us.

Our Privacy Policy is aligned with The Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) and the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).

## 5. How long do we keep your data for?

We will not store your personal information for longer than is necessary. G3 will ensure that our trusted partners and selected third parties with whom we share your personal information in accordance with this privacy notice will delete your personal information when they no longer require it.

If you choose to opt-in for careers support, we will periodically check with you that you wish to continue to receive relevant communications. When we no longer need personal information, we securely delete or destroy it.

## 6. How we store and protect your information?

G3 takes the following organizational measures to protect your personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorized use, unauthorized modification, disclosure, and against all other unlawful forms of processing:

G3 stores personal data electronically within the organization in computers, locked with a personal password; and in internal database software that asks for the username and password for accessing.

The data is processed until the provision of services is over, at which time all data is deleted or returned at request.

Access to personal data is restricted to individually authorized personnel based on their need to access that information. All staff and associates are subjected to a duty of confidence.

G3 does not process special categories of personal data, stated in Article 9 of the GDPR.

G3 will always keep you informed about changes to the processes to protect data privacy and security, including practices and policies. You may at any time request information on where and how data is stored, secured, and used.

Your personal information may be transferred by us or our trusted partners out of the European Economic Area (the “EEA”). The trusted partners that may do this are organisations who process data

for analysis or marketing purposes, including a marketing automation hub where the email address of recipients will be logged and a record of email delivery, opening, click-through and bounce-backs will be kept. Our partner uses Microsoft's Windows Azure data centres located in West Europe (Netherlands).

G3 has networks, databases, servers, systems, and support located throughout the world as we collaborate with third parties such as cloud hosting services, suppliers, and technology support located around the world to serve the needs of our customers. Your personal information may be shared with record matching and customer targeting partners, including Google, Facebook, Snapchat and LinkedIn. Some of these partners process personal data in Canada and the United States of America.

When we transfer personal information from the European Economic Area to other countries in which applicable laws do not offer the same level of data privacy protection as in your home country, we take measures to provide an appropriate level of data privacy protection.

In other words, your rights and protection remain with your data, i.e. we use approved contractual clauses, multiparty data transfer agreements, intragroup agreements, and other measures designed to ensure that the recipients of your personal information protect it. If you would like to know more about our data transfer practices, please contact

## 7. Your rights

We respect your right to access and control your information, and we will respond to requests for information and, where applicable, will correct, amend, or delete your personal information.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of personal information that we hold about you. This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- **Request erasure** of your personal information in limited circumstances. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are processing your personal information on the basis of our legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction or suspension of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- **Object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.

- **Request the transfer** of your personal information to another party.

### Sharing with Third Parties

G3 will never share your contact information unless you have given us consent to do so. Therefore, with your consent, we may disclose your information to third parties for their direct marketing purposes. If you would like to opt out of such disclosure, please contact us using the contact information listed in Clause 1.

## 8. Use of Cookies

### What Are Cookies?

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it, and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites' functionality.

### How We Use Cookies?

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases, there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not, in case they are used to provide a service that you use.

### Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore, it is recommended that you do not disable cookies.

### The Cookies We Set

Site preferences cookies: In order to provide you with a great experience on this site we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences, we need to set cookies so that this information can be called on whenever you interact with a page that is affected by your preferences. These site settings are primarily: privacy policy confirmation and landing identifier (how you arrived at our site from third party advertisements).

### Third-Party Cookies

In some special cases, we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

We may also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work, the following social media sites, including Facebook, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

## 9. Complaints

Should you have any queries or complaints in relation to how we use your personal information, please contact us at the Graduate Guidance Group using the details set out in this Privacy Policy. (See our Complaints and Escalation Policy) Should you wish to take any complaints or queries further, you have the right to contact the competent authority regarding such issues.

## 10. Changes to our Privacy Policy

We may change this Privacy Policy from time to time. If we do so, we will post the updated policy on our websites and will indicate when the Privacy Policy was last revised. You should periodically review our current Privacy Policy to stay informed.

This Privacy Policy was last modified on 1 June 2022.