



# PRIVACY POLICY

This Privacy Notice outlines what you can expect regarding the personal information we collect from you and how it is handled by Pagoda Projects Ltd.

Pagoda Projects Ltd, Innospace, The Shed, Chester Street, Manchester, M1 5GD, UK ('Pagoda Projects') is the data controller.

We assure you that any data of yours is handled in a manner that complies to the applicable data protection law. Right now, the Data Protection Act of 1988 applies. With effect from 25 May 2018, the General Data Protection Law (GDPR) will come into force. This privacy notice then will apply according to the new law.

## COLLECTED INFORMATION

Pagoda Projects collects data from each participant during the application process.

We ask you, as a participant of the programme, to complete an **application form**, which includes:

- Personal data:
  - Full name and contact information
  - Information about programme, destination and timeframe preferences
  - Information regarding course of study at university
- Sensitive personal data:
  - Nationality, gender and ethnicity.

We may also ask you to send your **CV, cover letter, grade transcripts, academic references** and **passport information** (sensitive personal data). We may take **interview notes** of you to find a suitable host-company or adjust the overall programme to better suit your expectations.

To confirm a place on the programme, we will ask you to complete our **booking form**, which includes:

- Personal data:
  - Full name
  - Information about the programme, accommodation and timeframes
  - Any applicable programme fees
  - Individual payment terms
  - Code of conduct
  - Applicant's signature

After completing the booking form, you will be required to complete a **health and safety form**, which includes:

- Personal data:
  - Full name
  - Emergency contacts
  - Student Finance information
  - Bank details
- Sensitive personal data:



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- Applicant's medical conditions
- Details of any required medication, allergies or intolerances
- Ethnicity

At the end of each completed programme, we ask you to complete a **feedback form**, which includes:

- Personal data:
  - Programme/ internship details
  - Accommodation details
  - Rating and information about Pagoda Projects's services
  - Applicant's current situation (Student, employed, etc.)

### USE OF INFORMATION

Pagoda Projects reserves the right to collect this information, especially personal data in the interest of the applicant as supposed to be the lawful basis for the application process. In addition, some information gathered are serving legal purposes as well.

The application form collects data, which help to understand the applicants' purpose for applying and also to narrow down the details of the programme they require. Pagoda Projects must request the applicants' nationality in order to assess eligibility for her/ his visa. The nationality is also marked as a mandatory field within the form, which leads to an automated decision-making progress. Again, as consequence the applicant is granted progress within the application process or is denied.

The CV, a cover letter and a grade transcript are collected for recruitment purposes and to judge the suitability of a candidate for the roles applied to finally send the person to a host company. These documents can be shared with universities, companies or even the British Council. This serves the purpose of finding the perfect matching company or university for the applicant, but also to see if funding requirements are met. In addition, Pagoda Projects makes interview notes, which are not shared with any third parties. These allow Pagoda Projects better decision-making.

After a formal agreement between applicant and Pagoda Projects considering the final destination and the programme, the applicant must sign the booking form to enter a formal contract with Pagoda Projects.

The passport is needed to prepare any visa application documents and again serves legal purposes, but also the applicants' interest in progressing within the application process.

The Health and Safety form serves various purposes: The applicants' medical conditions as well as emergency contacts are required in case of any occurring emergencies during the programme. These sensitive personal data are highly confidential and therefore can only be accessed by five persons, which are: the general manager, the China general manager, the operations manager, the booking manager and the partnership manager. Therefore, Pagoda Projects reserves the right to share medical information to third parties e.g. partnership manager to guarantee that the applicant will meet health requirements and if any health-related incidence occurs, that Pagoda



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Projects can guarantee the right treatment. It also serves the purpose to reassure the applicant's well-being and health at any time.

Bank details are needed in order to repay any deposits made. Details about ethnicity and nationality as well as the funding background are serving marketing and data analysis purposes.

### STORAGE AND RETENTION OF DATA

All of your data is collected and stored on the Pagoda Projects intranet, using [Podio](#), a cloud and web-based platform. Your data, with the exception of information contained in the health and safety form, are shared and accessible to every Pagoda Projects employee, because all employees may contribute towards the application and feedback process. The retention periods apply for the time directly after the programme ends.

We intend to erase some of the information you submit **immediately after** you complete the programme. As we process some of your data for statistical purposes, this deletion may take **up to six months**. We strive to process your data as quick as possible.

We aim to delete the following documents **as quickly as possible** upon completion of your Pagoda Projects programme:

- CV and cover letter
- Grade transcript and academic references
- Passport information

Some information we will store for a period of **six month** after you completed the programme. This is also due to the processing of the data. But also in case there is a later demand or request for specific information. For example, if you are funded by the British Council, it might request your bank details from Pagoda Projects to process the refund. The processing of your medical conditions also serves statistical purposes.

We aim to delete the following documents after **six months**:

- Your emergency contact details
- Your bank details, assuming the return of any applicable deposit has been successfully completed
- Student Finance information
- Applicant's medical conditions
- Details of any required medication, allergies or intolerances

With your consent we would like to store some of your data for an **indefinite time**. This would include the following information:

- Application form (including name and contact details)
- Nationality, gender and ethnicity
- Booking form
- Feedback forms (excluding contact information)



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The above-mentioned data is retained for an indefinite period primarily for statistical purposes. Those statistics may be used for marketing purposes or for reporting purposes with our partner universities or government partners. Retaining your feedback helps to make improvements for other students over time and to track our progress in relation to continuous improvement. If your application was unsuccessful due to legal or visa requirements, we also intend to store your data for an indefinite amount of time. We do this so that we can contact you regarding Pagoda Projects programmes, should legal or visa-related circumstances change in your favour over time. We continue to store data as mentioned above, partly because third-party organisations can, in our experience, request information relating to your Pagoda Projects programme, several months or years after the completion of your programme. In such cases we would not share any information with a third party without your explicit consent.

For participants who are under the age of 18 when commencing their Pagoda Projects programme, special legislation regarding the storage of your data will be considered. Your data will be stored by Pagoda Projects until you are 21 and medical information until you are 25. This regulation is based on UK law. But again, without your explicit consent, we will not store it longer than we mentioned before.

Keep in mind that you can also make use of your 'right to be forgotten' (See: Your individual rights – 4. The right to erase), whereby upon request we will delete your data as quickly as possible. Please note that this process could take up to one month.

### YOUR INDIVIDUAL RIGHTS

Pagoda Projects would like to inform you about your right when we are working with your information. If you would like to make use of your rights, bear in mind that responding to some request could take up to one month. Also, we would like you to know that any request will be completely free of charge. Make sure that you make use of your rights verbally (e.g. in person or on the phone) or in written (e.g. email or letter). We strongly recommend to do it in written, so we can keep track of your wishes.

#### 1. THE RIGHT TO BE INFORMED

You, as the participant of the programme, can always ask us for what and why we are using your information and with whom and why we are sharing your information and for how long.

#### 2. THE RIGHT OF ACCESS

You, as the participant of the programme, can always access to your information as long as you can identify yourself as this specific participant. If you want we can also inform you whenever we process your information.

#### 3. THE RIGHT TO RECTIFICATION

You, as the participant of the programme, can always ask Pagoda Projects to correct or update your information in case they are renewed or if you have the impression they might be wrong.

#### 4. THE RIGHT TO ERASE



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You, as the participant of the programme, has 'the right to be forgotten', which means that you can ask us to delete your information at any time.

But bear in mind that Pagoda Projects can legally store your data if:

1) the processing is necessary for public health purposes in the public interest (eg protecting against serious cross-border threats to health, or ensuring high standards of quality and safety of health care and of medicinal products or medical devices);

Or

2) if the processing is necessary for the purposes of preventative or occupational medicine (e.g. where the processing is necessary for the working capacity of an employee; for medical diagnosis; for the provision of health or social care; or for the management of health or social care systems or services). This only applies where the data is being processed by or under the responsibility of a professional subject to a legal obligation of professional secrecy (e.g. a health professional).

### 5. THE RIGHT TO RESTRICT PROCESSING

You, as the participant of the programme, if you have the impression that the information we collected from you is inaccurate, you can pause the processing of these information. In the meanwhile Pagoda Projects would just store your data until it is corrected.

### 6. THE RIGHT TO DATA PORTABILITY

You, as the participant of the programme, can demand your information in a structured, commonly used and machine readable format from Pagoda Projects to then use it for your own purposes or for other services. You can also ask Pagoda Projects to forward your information to another controller.

But, for demanding this service you must label this as a subject access request (SAR) and we recommend you to do this in written.

### 7. THE RIGHT TO OBJECT

You, as the participant of the programme, can always object or stop Pagoda Projects to use your information for direct marketing or research and statistic purposes. Other reasons for you to object the processing of your information is if the process is based on legitimate interests or the performance of a task in the public interest or the exercise of official authority.

### 8. RIGHTS IN RELATION TO AUTOMATED DECISION MAKING AND PROFILING

Pagoda Projects has the right for automated individual decision-making as well as profiling. We would like to inform you that we must take use of this right at the beginning of the application process e.g. Visa requirements due to the nationality are met. With accepting the terms and conditions, you as the participant, give us explicit consent to do so.

### CONSENT

Pagoda Projects guarantees not to use any of your information without your consent. Explicit consent for very specific information and documents and their use will be asked by us at various points. We are only able to process with e.g. your application if we get your consent.



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### CHILDREN'S RIGHTS

Applicants must be at least 16 years old. If you are under the age of 18 we require parental consent in order for you to complete an Pagoda Projects programme. Your parent or guardian must complete our consent form on your behalf before we can process your application. We know that legally you are allowed to give your own consent. Nevertheless, we need the consent of your parents, because of the nature of our overseas programme.

### WITHDRAWAL OF CONSENT

You, as the participant of the programme, can withdraw from any of your consents given at any time. You can withdraw verbally or in written.

### MARKETING PURPOSES

We collect your information partly for statistical purposes. The resulting statistics could be published on our website, printed marketing materials or social media channels, or shared with third parties with the purpose of marketing or partnership development. When we process the data, we make every effort to assure that all of the information is anonymized and that no data can be linked to the individual.

The use of data we collect for statistical purposes is dependent on the specific audience, for example:

- During our attendance of an international higher education conference, we reveal the average percentage of our participants who are UK nationals, compared with the percentage from Mainland Europe.
- Whilst discussing our programme with a university partner, we state the percentage of our participants are government funded, compared with those funded by university partners.
- In a proposal sent to a prospective partner, to demonstrate the positive ethnic diversity of our participants, we may list the percentage of participants from certain ethnic backgrounds.

We may also share such statistical analysis, upon request, with organisations such as the British Council, which we then would share following confidentiality and anonymity regulations. Generating statistics also helps us to improve our programmes, make them more participant-friendly and available to a more diverse range of people.

We use video and image content for case studies, which we use for marketing purposes. The case studies could occur in 'day-in-a-life of an Pagoda Projects participant' format and would be published on our social media channels. In cases where we intend to shoot or use footage of a participant, we would ask for explicit consent before filming. In addition we would like to assure that we do not use any of the data for direct marketing or that we sell any information to third parties.

### PASSPORT AND VISA REGULATIONS

In some cases Pagoda Projects manages the visa application on your behalf. To do so, we require your consent that we may be in possession of your original and physical passport and your visa documents and to share these with both the China Visa Centre and carefully selected third party visa agents in order to receive the required visa.



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We reassure that whilst we are in possession of your passport and your visa documents, we store these safely in a locked cabinet in our office.

By allowing us to process your visa application, various risks are assumed (e.g. the documents are getting lost in the mail). Pagoda Projects does not assume any responsibility for the loss or damage of your possessions and you send documents at your own risk.

### INSURANCE

Should you suffer an accident or an injury during your Pagoda Projects programme and need to make an insurance claim, you will be asked to complete a claim form and provide receipts for any costs incurred in relation to the claim.

We will take copies of the insurance claim and complete an internal report. We retain anonymized data in relation to all claims to analyze trends and improve our best practice when handling claims. Data retention is done in the interest of training and improving the way in which we handle emergencies and insurance claims for future participants.

### CONCERNS

If you, as a participant of this programme, have any concerns about how Pagoda Projects is using your information, you should raise your concern with us in the first instance or directly contact the Information Commissioners Office at <https://ico.org.uk/concerns>.

### CONTACT

Please address any questions, comments and requests regarding our data processing practices to Jamie Bettles, Managing director: [Jamie.bettles@PagodaProjects.com](mailto:Jamie.bettles@PagodaProjects.com); +44 161 8188823.

### CHANGES TO THE PRIVACY NOTICE

Pagoda Projects reserves the right to adapt this privacy notice due to changing legal requirements and to reassure compliance. If changes are made, the applicant will be informed.