



PRIVACY POLICY

Last updated: 12 April 2022

1. ABOUT THIS PRIVACY POLICY

- 1.1. The website www.pagodaprojects.com (the **Site**) and the Pagoda Projects App (the **App**) is operated by Pagoda Projects Ltd (“we”, “us”, “our”), a company incorporated in England and Wales under company number 10992310. Our registered office is at 5 Parsonage, Manchester, M3 2HS.
- 1.2. We are committed to protecting your privacy and complying with our data protection obligations under the Data Protection Act 2018 (the **DPA 2018**), the General Data Protection Regulation 2016/679 (the **GDPR**) and any other applicable UK legislation (together, **Data Protection Law**).
- 1.3. When you interact with us or use the Site or the App, we act as the data controller of your personal data. This means that we are responsible for processing your personal data and deciding how to use it. This privacy policy explains the types of personal data we may collect about you when you interact with us, why we collect it, what we use it for and what rights you have over that data. Personal data is any information about an identifiable person. Processing is anything we do with your personal data, including using, storing, sharing and deleting it.
- 1.4. This policy was last updated on the date shown at the top. We may change this policy at any time by posting an updated version on the Site and will make reasonable efforts to bring any material changes to your attention. You may wish to check it before using the Site as any changes will be effective from the date that they are made.

2. CONTACT INFORMATION

- 2.1. If you have any concerns or would like further information about our use of data or this policy in general, you can contact Clare Harding at clare.harding@pagodaprojects.com.
- 2.2. If you would like to make an official request to access, object to or erase your data, you can submit that request via the following form <https://pagodaprojects.com/gdpr-request/>.

3. WHAT INFORMATION DO WE COLLECT?

- 3.1. We collect, store and use the types of personal data set out in the table at the end of this policy.

4. HOW WILL WE USE YOUR PERSONAL DATA?

- 4.1. We will use your personal data for the purposes set out in the table at the end of this policy.

5. HOW DO WE SHARE YOUR PERSONAL DATA?

- 5.1. When we share personal data, we do so in accordance with Data Protection Law. We may share certain personal data, where necessary, with employees, contractors, consultants or advisers, to facilitate programme delivery and for general commercial purposes.

In addition, where necessary, your personal data may be shared:



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- 5.1.1. with associated or affiliated companies including Intern China Ltd, for internal administrative purposes.
 - 5.1.2. with parties who provide products or services to us, including data hosting on our CRM, server and the App, software development partners, user analytics, data analytics, email services, payment processing, advertising, texting and messaging services, user notification and feedback functionality, delivery couriers, insurance companies, travel services providers, accommodation providers, visa service providers, Pagoda Members or partners and university or government funding partners etc.
 - 5.1.3. with government or quasi-governmental organisations, law enforcement and other regulatory authorities or third parties when required or permitted by law, including but not limited to in response to court orders, for the prevention and detection of crime and to protect intellectual property and any other legal rights.
 - 5.1.4. if the company or business is sold, transferred or integrated with another business, with our advisers, a prospective purchaser, a prospective purchaser's advisers or the new owner of the company or business to facilitate the process.
- 5.2. We may also provide third parties with aggregated but anonymised information and analytics about our customers. Before we do so we will make sure that it does not identify you.
- 5.3. In some cases, when we share personal data, it will involve the transfer of that personal data to countries outside the EEA which have different data protection standards to those which apply in the EEA.

Where we transfer personal data outside the EEA we will ensure that there are adequate safeguards to protect your privacy rights under Data Protection Law.

6. THIRD PARTY LINKS

- 6.1. This Site and the App contain links to other websites over which we have no control. We are not responsible for and do not review or endorse the privacy policies or practices of other sites which you choose to access from this Site. We encourage you to review the privacy policies of those other sites, so you can understand how they collect, use and share your personal information.

7. YOUR RIGHTS

- 7.1. We respect your rights to privacy and will respond to requests for access or control over information about you in accordance with Data Protection Law. We may require you to verify your identity before we take any action.
- 7.2. Depending on the reason we have your personal data, you have a right to:
 - 7.2.1. access the personal information we hold about you (commonly known as subject access);
 - 7.2.2. request that we correct or complete personal information we hold about you that is inaccurate or incomplete;



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7.2.3. request that we erase your personal information in some circumstances, or object to our processing it as detailed at paragraph 7.5;

7.2.4. restrict how we use your personal information, in certain circumstances;

7.2.5. request that we provide you with copies of your personal information in a machine-readable format or transfer it across different services; and

7.2.6. where we have asked for your consent to process your data, to withdraw this consent.

7.3. These rights are limited in some situations under Data Protection Law – for example, where we can demonstrate that we are under a legal obligation to process your data.

7.4. If you wish to exercise any of these rights, please contact us using the details in paragraph 2.2 **Error! Reference source not found.** above.

7.5. Your right to object

You have a right to object to our processing of your personal data and ask us to stop doing so. If we are processing your personal data for direct marketing purposes (which includes profiling to the extent that it is related to such direct marketing) and you object to this, we will stop processing your personal data immediately.

If our processing of your personal data is in the public interest or pursuant to our legitimate interests and you object to this, we will stop processing your personal data unless we have compelling reasons which override your interests, or our use of your personal data is for the establishment, exercise or defence of legal claims.

7.6. We hope that we can satisfy any queries you may have about the way we process your data. However, if you have unresolved concerns you also have the right to complain to data protection authorities (in the UK, the Information Commissioner's Office). You can call the ICO on 0303 123 1113 or go to their website: <https://ico.org.uk/make-a-complaint/>).

8. DATA RETENTION

8.1. Your personal data will only be kept for as long as necessary for our purposes. Specific periods are set out in the table at the end of this policy.

9. DATA PROTECTION PRINCIPLES

9.1. We process your personal data in accordance with the following principles:

9.1.1. we process your personal data lawfully, fairly and in a transparent way;

9.1.2. we collect your personal data for specified, explicit and legitimate purposes; any further processing we do is compatible with the original purposes for which for which we collected it;



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- 9.1.3. we only process personal data which is adequate, relevant and limited to what is necessary to achieve the purpose for which it is processed;
 - 9.1.4. we take reasonable steps to ensure that all personal data is accurate and kept up to date where necessary;
 - 9.1.5. we do not store personal data in a form which identifies you for any longer than is necessary for the purposes of processing; and
 - 9.1.6. we process personal data securely and in a way that protects against unauthorised or unlawful processing, accidental loss, destruction or damage.
- 9.2. When we ask for your personal data, we will tell you whether you are required by law or contract to provide it, and what will happen if you do not provide the data.
- 9.3. Any request for consent to the processing of your personal data will be made directly to you and will include information about why we require the personal data and what will be done with it.

10. WHAT IS OUR LAWFUL BASIS FOR PROCESSING?

- 10.1. We will only process personal data when we have a lawful basis for doing that processing. The table at the end of this policy sets out the lawful basis we rely on for each type of data we process.
- 10.2. We will choose one of the lawful bases in the GDPR to justify how we use your personal data. These are:
- 10.2.1. **Consent:** You have given consent to the processing of your personal data for one or more specific purposes.
 - 10.2.2. **Contract:** The processing is necessary for the performance of a contract with you or in order to take steps at your request before entering into a contract.
 - 10.2.3. **Legal obligation:** We need to process your personal data to comply with a legal obligation.
 - 10.2.4. **Vital interests:** The processing is necessary to protect the vital interests of you or another person.
 - 10.2.5. **Public interest:** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of some official authority.
 - 10.2.6. **Legitimate interests:** Processing is necessary for the purposes of legitimate interests pursued by us or someone else, except where such interests are overridden by your interests or fundamental rights and freedoms requiring the protection of your personal data.

11. ATTRIBUTION

- 11.1.1. This privacy policy was created using a template from Sparqa Legal (<https://www.sparqa.com>), August 27, 2020.



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TABLE OF PERSONAL INFORMATION WE USE

The table below sets out detailed information about our purposes for processing, the basis for processing and the retention period for the personal data.

Colour Key (applicable to relevant parties):

- Applicants, Participants & Alumni = **Blue**
- University, Government, Agency Partners or Customers = **Orange**
- Pagoda Members & Host Companies = **Red**
- All Parties = **Green**

CATEGORY OF PERSONAL DATA	PURPOSE OF PROCESSING	LAWFUL BASIS FOR PROCESSING	RETENTION PERIOD
<p>Name and contact details for</p> <ul style="list-style-type: none"> - Applicants, Participants & Alumni - University, Government, Agency, or Partner Contacts - Pagoda Members & Host Companies 	<p>To give access to the App and to deliver information about our programmes, application processes and services to you</p> <p>To send you future updates about new programmes, applications or services that apply to you</p> <p>For fraud prevention and detection</p> <p>To contact you with information, newsletters and marketing materials about our programmes and services</p> <p>We may also share this data with the correct visa centre or carefully selected third party visa agent in relation to in-person programmes.</p>	<p>Performance of contract</p> <p>Compliance with legal obligation</p> <p>Consent</p>	<p>For six years since you gave consent, or until you withdraw consent</p>
<p>Contact History for</p> <ul style="list-style-type: none"> - Applicants, Participants & Alumni 	<p>To provide customer service and support</p> <p>To train our staff and ensure that information is pertinent, concise and</p>	<p>Performance of contract</p> <p>Legitimate interests in dealing with complaints or claims</p>	<p>For six years since you last contacted us regarding your inquiry, application or programme</p>



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<ul style="list-style-type: none"> - University, Government, Agency, or Partner Customers - Pagoda Members & Host Companies 	<p>repeated</p>		
<p>Payment Information <i>for</i></p> <ul style="list-style-type: none"> - Participants & Alumni - University, Government or Agency Customers - Pagoda Members & Host Companies 	<p>To take payment for deposits and give refunds to participants on our programmes</p> <p>To take payment and give refunds to Pagoda Members and university or government partners and customers</p> <p>For fraud prevention and detection</p>	<p>Performance of contract</p> <p>Compliance with legal obligation</p> <p>Consent</p>	<p>For three years since the last payment or refund was paid on that programme or contract, or until you withdraw consent</p>
<p>Purchase History <i>for</i></p> <ul style="list-style-type: none"> - Alumni - University, Government, Agency, or Partner Customers - Pagoda Members & Host Companies 	<p>To provide customer service and support and handle returns or refunds</p> <p>To ask for feedback on our services and to propose any changes or renewal of those services</p>	<p>Performance of contract</p> <p>Legitimate interest to further commercial activity</p> <p>Consent</p>	<p>For six years since you gave consent, or until you withdraw consent</p>
<p>Browser, device and Site usage information <i>for</i></p> <ul style="list-style-type: none"> - All visitors to the Site 	<p>To improve the Site</p> <p>To protect the Site against fraud</p> <p>To set default options for you, such as language and currency</p>	<p>Performance of contract</p> <p>Legitimate interest in maintaining our Site</p>	<p>For three years since you last logged on to the Site</p>



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<p>Responses to surveys, competitions & promotions <i>for</i></p> <ul style="list-style-type: none"> - Applicants, Participants & Alumni - University, Government, Agency, or Partner Customers - Pagoda Members & Host Companies 	<p>To run the survey, competition or promotion</p> <p>Statistics for use on our Site, 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 the information is anonymised unless specific consent has been sought from the individual.</p>	<p>Performance of contract</p> <p>Legitimate interest in administering and/or improving our programmes, products and services generally</p> <p>Consent</p>	<p>For six years since you gave consent, or until you withdraw consent, or the results are anonymised</p>
<p>Customer comments, feedback & reviews <i>for</i></p> <ul style="list-style-type: none"> - Applicants, Participants & Alumni - University, Government, Agency, or Partner Customers - Pagoda Members & Host Companies 	<p>To improve our programmes and services.</p> <p>Where relevant, to establish, exercise or defend legal claims.</p> <p>For use on our Site, 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 the information is anonymised unless specific consent has been sought from the individual.</p>	<p>Performance of contract</p> <p>Legitimate interest in dealing with complaints or claims and improving our programmes, products and/or services generally.</p> <p>Consent</p>	<p>For six years since you gave consent, or until you withdraw consent, or the results are anonymised</p>
<p>Information generated in the course of the use of our programmes, products and services <i>for</i></p>	<p>For internal research on our programmes and services for development purposes</p> <p>To improve and test the features and</p>	<p>Performance of contract</p> <p>Legitimate interest in maintaining our Site and our App and improving our products</p>	<p>For six years</p>



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- All parties	functions of our Site or mobile App	and/or services generally	
Information collected through cookies and similar technologies <i>for</i> - All visitors to the Site	To conduct and store site usage analytics, statistical and trend analysis and market research To generate customer profiles to facilitate marketing initiatives	Consent	For three years since you gave consent, or until you withdraw consent if earlier
Business Licences, Registration, Insurance & Safety Certificates <i>for</i> - Pagoda Members & Host Companies	For legitimacy and safety checks in line with our programme quality policies and fraud prevention	Legitimate interest to ensure members & host companies pass quality and security checks before hosting Performance of contract Compliance with legal obligations Consent	For six years since you gave consent, or until you withdraw consent if earlier
Saved items in online shopping basket <i>for</i> - Pagoda Members	To follow-up on your order to sell our membership services to you	Legitimate interest to further commercial activity	Until you complete your order, or for seven days after the item is saved
Date of birth <i>for</i> - Applicants, Participants & Alumni - All Parties registered on the App	To ensure minimum age-restrictions for registration to the App To ensure minimum age-restrictions for participants on our programmes N.B. Applicants must be at least 16 years	Performance of contract Compliance with legal obligation Legitimate interests in ensuring your safety	For three years since you last contacted us regarding your application, since you finished your programme, or until you withdraw consent



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	<p>old. If you are under the age of 18, we require parental consent in order for you to complete a Pagoda Projects programme. Your parent or guardian must complete our consent form on your behalf before we can process your application.</p> <p>To ensure eligibility for visa and travel restrictions for participants on our programmes. For this purpose we may also share this data with the correct visa centre or carefully selected third party visa agent.</p>	<p>Consent</p>	
<p>Additional Personal Information incl. Personal preference & fun facts <i>For</i> - All Parties registered on the App</p>	<p>Additional information about you may also be requested as you join a group on the App.</p>	<p>Performance of contract</p> <p>This information is purely for the purpose of administering the group on the App.</p> <p>Consent</p>	<p>Until you leave the Group on the App</p>
<p>Passport Information incl. Nationality <i>for</i> - Applicants, Participants & Alumni (if applicable)</p>	<p>Nationality & age verification for travel requirements, visa application requirements and funding eligibility.</p> <p>Passport copies and data are used with consent for visa applications, official registration purposes and during trips as part of travel & safety procedures. For this purpose we may also share this data with the correct visa centre or carefully selected third party visa agent.</p>	<p>Performance of contract</p> <p>Compliance with legal obligations</p> <p>Legitimate interest that eligibility be verified at the earliest stage of the application process to ensure programme participation.</p> <p>Consent</p>	<p>For three years since you gave consent, or until you withdraw consent if earlier</p>



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	<p>N.B. If your application is unsuccessful due to travel or visa requirements, we will still store your data for the specified period in case legal or visa-related circumstances change in your favour over time and alternative programmes are possible.</p>		
<p>Visa Application Documents <i>for</i> -- Applicants & Participants (if applicable)</p>	<p>To ensure the visa application process goes smoothly we may require your consent to be in possession of your original passport and your visa documents to share these with the correct visa centre or carefully selected third party visa agent.</p> <p>N.B. Pagoda Projects does not assume any responsibility for the loss or damage of your possessions by third party couriers, and you send documents at your own risk.</p>	<p>Performance of contract</p>	<p>Until you complete your visa application, or for one month after documents have arrived at Pagoda Projects premises.</p>
<p>CVs & Resumés <i>for</i> -- Applicants, Participants & Alumni</p>	<p>For programme placement processes, to be shared (upon consent) with specific third-party Pagoda Members and host companies for the purposes of programme placement. For this purpose we may share with Engaged Learning Global LLC, a contracted partner assisting Pagoda with USA internships.</p>	<p>Performance of contract</p> <p>Consent</p>	<p>For three years since you gave consent, or until you withdraw consent if earlier</p>
<p>Student Finance Documents, Reference Letters, Grade</p>	<p>For eligibility checks in specific cases where required in applications for government or institution funded</p>	<p>Performance of contract</p> <p>Compliance with legal obligations</p>	<p>For three years since you gave consent, or until you withdraw consent if earlier</p>



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<p>Transcripts, Registry Letters & Proof of Address <i>for</i> - Applicants, Participants & Alumni (if applicable)</p>	<p>programmes.</p>	<p>Consent</p>	
<p>Mental & Physical Health Conditions, History or Disabilities <i>for</i> - Applicants, Participants & Alumni</p>	<p>For Pagoda Staff to provide support and guidance that will ensure the participant's well-being on the programme. As well as the well-being of all those involved in delivering and supporting the participant through the programme.</p> <p>For insurance purposes</p>	<p>Legitimate interest of safety and well-being for participant, Pagoda Projects staff and other parties involved in the programme.</p> <p>Compliance with legal obligations</p> <p>Consent</p>	<p>For one year since you gave consent, or until you withdraw consent if earlier</p>
<p>Emergency Contacts <i>for</i> - Applicants, Participants & Alumni</p>	<p>For use in the event of an emergency or concern over the participant's wellbeing during the programme.</p> <p>For insurance purposes.</p>	<p>To further the participant's well-being and support Pagoda Staff in emergencies.</p> <p>Performance of contract</p> <p>Compliance with legal obligations</p> <p>Consent</p>	<p>For one year since you gave consent, or until you withdraw consent if earlier</p>
<p>Insurance Claims <i>for</i> - Applicants, Participants & Alumni (if applicable)</p>	<p>For accident, medical or travel insurance claims made on via the Pagoda Projects programme insurance policy. We will submit a claim form on behalf of the participant and will require any receipts for related costs incurred be provided.</p> <p>We retain anonymized data in relation to all claims to analyse trends and improve</p>	<p>In the interests of training and improving the way in which we handle emergencies and insurance claims for future participants.</p> <p>Performance of contract</p> <p>Compliance with legal obligations</p>	<p>For one year since you gave consent, or until you withdraw consent if earlier, or until the data is anonymised.</p>



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	our best practice when handling claims.	Consent	
<p>Ethnicity <i>for</i> - Applicants, Participants & Alumni</p>	<p>For programme impact analysis</p> <p>Statistics for use on our Site, 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 the information is anonymised unless specific consent has been sought from the individual.</p>	<p>Legitimate interest to further our business's social impact in line with company goals and values. Generating statistics helps us to improve our programmes, make them more participant-friendly and available to a more diverse range of people.</p> <p>Consent</p>	<p>For one year since you gave consent, or until you withdraw consent, or the data is anonymised</p>
<p>Study History, Course Information & Graduation Date <i>for</i> - Applicants, Participants & Alumni</p>	<p>For internal staff training purposes & programme impact analysis</p> <p>Statistics for use on our Site, 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 the information is anonymised unless specific consent has been sought from the individual.</p>	<p>Legitimate interest to further our programmes social impact in line with company goals and values. To provide accurate information to potential Pagoda Members, partner companies and future participants on the suitability and impact of a participant's study background both during and after the programme.</p> <p>Generating statistics also helps us to improve our programmes, make them more participant-friendly and available to a more diverse range of people.</p> <p>Performance of contract</p> <p>Consent</p>	<p>For six years since you gave consent, or until you withdraw consent if earlier, or the data is anonymised</p>



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<p>Video Testimonial, Case Studies & Photographic Content <i>for</i> - All parties</p>	<p>For marketing purposes, use on our Site, printed marketing materials or social media channels, or shared with third parties with the purpose of marketing or partnership development. Explicit consent will be sought from the individual before filming video content. When we process the content, we make every effort to assure that all the information is anonymised unless specific consent has been sought from the individual.</p>	<p>Legitimate interest to further our programmes social impact in line with company goals and values. To provide accurate information to potential Pagoda Members, partner companies and future participants on the suitability and impact of a participant's study background both during and after the programme.</p> <p>Performance of contract</p> <p>Consent</p>	<p>For an indefinite period since you gave consent, or until you withdraw consent</p>
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