



# Navitas Recruitment Privacy Notice

<b>Document Name</b>	Navitas Recruitment Privacy Notice
<b>Brief Description</b>	Privacy notice for recruitment processes for active roles and to store your details for any suitable future roles.
<b>Responsibility</b>	Talent Acquisition
<b>Initial issue Date</b>	6/08/2018

Date	Version number	Summary of changes
9/12/2024	2.0	Update to include expanded geographies and new recruitment platforms Change of document name

## Navitas Recruitment Privacy Notice

### 1. Introduction

Navitas respects your right to privacy. This privacy notice explains who we are, how we collect, share and use personal information about you and how you can exercise your privacy rights. Navitas reserves the right to make changes periodically to this Privacy Notice at our discretion, when needed. Any changes will be communicated via updates to this notice.

Navitas is a global education provider (ABN 69 109 613 309). Our head office is in Perth, Western Australia at the following address:

Navitas Pty Limited

Level 9, 143 St Georges Terrace PERTH WA 6000 Australia

The Company has subsidiary companies and affiliated organisations operating in Australia, New Zealand, Canada, UK, Europe, Africa, Southeast Asia, North Asia, South America, the Middle East, and the USA, collectively called the “Company”.

The European head office is in the UK at the following address:

Navitas UK Holdings Limited

The Lambourn, Wyndyke Furlong

Abingdon, Oxfordshire, OX14 1UJ

You can contact Navitas for any privacy related questions or concerns, from any country in the world by emailing the Privacy Team at [privacy@navitas.com](mailto:privacy@navitas.com)

### 2. The personal data are we collecting from you and how we will use it.

When you apply for a role with Navitas, the below personal data is collected.

- Resume/CV/cover letter
- Name
- Email
- Phone number
- Location
- Salary expectations
- Eligibility to work
- Publicly accessible information from sources such as LinkedIn

Your information will be used to determine your suitability for an interview with us, through our shortlisting process. It will also be used to contact you to arrange an interview, should you meet the required criteria. Depending on your location, and the details provided, contact with you will be carried out via SMS, WhatsApp, email or phone.

We use software that artificial intelligence (AI) tools to assist in the recruitment process. These tools help us to:

- Screen and short list candidates based on criteria relevant to the role
- Analyse resumes and application forms

While AI tools assist in the recruitment process, final hiring decisions are made by people responsible for the recruitment process. AI tools provide recommendations, but they do not make final decisions.

### 3. The lawful basis for collecting and processing your personal data.

Lawful condition for processing – for the establishment or performance of a contract (employment contract)

### 4. How long do we keep your Personal Data?

For un-successful candidates Navitas will keep a copy of your personal data, as described above, for no longer than 12 months. This allows us to look at suitability for other roles which may be available.

If you are successful and employed by Navitas, the way we use your personal data will be covered under our main privacy notice on our website.

### 5. Sharing your personal data

#### Sharing within Navitas

Navitas is a global organisation. We have operations in many different geographic regions and our head office is in Australia, therefore, we will share your personal data internationally, within our business.

#### Sharing with University Partners

Navitas operates some parts of its business under arrangements with University Partners for the purpose of delivering educational services and support. These agreements will require Navitas to share personal details collected during a successful candidate’s application and interview process to support a candidate’s selection and suitability for the role. If this is the case with the role you are applying for, this will be made clear.

#### Software Suppliers

Software suppliers provide us with recruitment systems. These providers hold your personal data on our behalf and are detailed below. Your personal data is stored in these systems. They are international providers and as such personal data is held in locations globally.

Required legal safeguards are in place to secure your personal data.

Supplier	Region Served	Server/cloud location
SmartRecruiters	Australia, New Zealand, Sri Lanka, Indonesia, UAE, Singapore	Australia
Qualtrics	Australia	Worldwide
TALAI	UK, Europe	UK, Germany
BambooHR	Africa, Middle East, China, Southeast Asia, India sub-continent, North America, Canada	Ireland, USA

## International transfers of your personal data

Where your personal data is shared internally across Navitas and the countries it resides in, there is an Intra-Group Data Sharing Agreement, which includes the required safeguards to keep your personal data safe.

The above software suppliers also hold your personal data. These transfers are protected by safeguards and contractual arrangements, as required.

## 6. Your rights over your personal data explained

The rights you have may be different depending on where you live in the world, or where in the world Navitas is using your personal data.

If your country is not listed below, please contact: [privacy@navitas.com](mailto:privacy@navitas.com) for further information.

Depending on what lawful basis is being used to collect and process your personal data, some of the data subjects' rights may not be engaged. We have highlighted those which apply to you in respect of the personal data we are using in this privacy notice. Any Rights not engaged are greyed out.

The GDPR Rights listed directly below will be honoured no matter where in the world you are located, as Navitas has adopted the EU GDPR across its business.

Therefore, you have the right to request from us any of the below:

- request a copy of the personal data Navitas holds on you
- right to rectification
- right to erasure
- right to restriction of processing
- right to portability
- automated individual decision-making, including profiling
- Right to object

If you are residing in Australia, you also have the right to:

- request anonymity and pseudonymity
- request for information not to be used for marketing purposes
- access and review personal data we hold about you
- rectify/correct any inaccurate personal information we hold about you

If you are residing in New Zealand or Canada, you have the right to:

- Access and review personal data we hold about you
- Rectify/correct personal data we hold about you

If you are residing in the United States of America, you have the right to:

- Access and review personal data we hold about you
- Rectify/correct personal data we hold about you
- Be informed of any disclosures
- Request deletion of your information

For any questions, queries, or to make a request, no matter where in the world you are located, please email [privacy@navitas.com](mailto:privacy@navitas.com)

## 7. Questions or concerns you may have

If you are contacting us to complain about an alleged breach of this Privacy Notice, or you have a question, please provide us with as much detail as possible so that we can deal with your concern quickly and effectively.

We will take every privacy complaint seriously and assess it with the aim of resolving the issue swiftly.

If you wish to contact the DPO for Navitas, and raise any queries or concerns, they can be contacted via [privacy@navitas.com](mailto:privacy@navitas.com)

## 8. Contacting your supervisory authority

If you need to make a complaint about how Navitas collects and uses your personal data, we kindly ask that you contact us in the first instance on [privacy@navitas.com](mailto:privacy@navitas.com)

The Regulators, no matter what country they reside in, would prefer that Navitas tries to resolve any issues with you first before you contact them. However, the Regulators are there for your concerns, and if you feel Navitas has not handled your complaint appropriately, we encourage you to contact them.

Navitas is committed to open and transparent processing of your personal data and welcome the Regulators view.

You may contact the Regulator in whichever country you live and details of them can be found via a quick Google search, if you are not already aware of them. Alternatively, please reach out to our privacy team for advice, they will be happy to assist you.

<p><b>UK</b></p> <p>Information Commissioner's Office</p> <p>Wycliffe House</p> <p>Water Lane</p> <p>Wilmslow, Cheshire, SK9 5AF</p> <p>Telephone: 0303 123 1113</p> <p>Email: <a href="mailto:casework@ico.org">casework@ico.org</a></p> <p>Website - <a href="http://www.ico.org.uk">www.ico.org.uk</a></p>	<p><b>Australia</b></p> <p>Australian Information Commissioner (Oaic)</p> <p>Telephone +61 1300 363 992</p> <p>Email: <a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a></p> <p>Website: <a href="http://www.oaic.gov.au">www.oaic.gov.au</a></p>
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