



# **360 GLE™** **PRIVACY POLICY**

Last Modified: May 24th, 2022

## **Privacy Policy for Study Abroad Association - 360 GLE™**

Study Abroad Association - 360 GLE™, accessible from <https://360discovered.studyabroadassociation.com/>, one of our main priorities is the privacy of our visitors. This Privacy Policy document contains types of information that is collected and recorded by Study Abroad Association - 360 GLE™ and how it's used.

If you have additional questions or require more information about our Privacy Policy, do not hesitate to contact us.

### **General Data Protection Regulation (GDPR)**

Study Abroad Association - 360 GLE™ will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our policies.

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. If you wish to be informed what Personal Information we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on record for you.
- The right of rectification.
- The right to object.
- The right of restriction.
- The right to data portability
- The right to withdraw consent

### **Log Files**

Study Abroad Association - 360 GLE™ follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this as a part of hosting services' analytics. The information collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

### **Cookies and Web Beacons**

Like any other website, Study Abroad Association - 360 GLE™ uses 'cookies'. These cookies are used to store information including visitors' preferences, and the pages on the website that the visitor accessed or visited. The information is used to optimize the users' experience by customizing our web page content based on visitors' browser type and/or other information.

## Privacy Policies

Study Abroad Association - 360 GLE™ - Does not use advertisements on the platform, nor is user's information shared with third party advertisers.

### Online Privacy Policy Only

Our Privacy Policy applies only to our online activities and is valid for visitors to our website with regards to the information that they shared and/or collected in 360 GLE™ Global Learning Experiences. This policy is not applicable to any information collected offline or via channels other than this website. This policy sets out the basis on which any Personal Data we collect from you, or that you provide to us, will be processed by **Study Abroad Association - 360 GLE™** and supplements, where applicable, the Customer's privacy policy.

Please read this privacy policy carefully to understand the types of information we collect from you, how we use that information, the circumstances under which we will share it with third parties, and your rights in relation to the personal data you provide to us.

### Policy Specifics

SAA is committed to protecting the privacy of our users accessing the 360 GLE™ platform. The **Study Abroad Association - 360 GLE™** privacy policy (the "Privacy Policy") applies to all Personal Data (as defined below) submitted to and processed by us. This includes Personal Data collected or submitted through: online registration forms found on our website, emails, or via third party platforms used to access the **Study Abroad Association - 360 GLE™** (i.e. Thinkific). As well, this policy applies to all similar information collected by the institution (school, college, university) and subsequently submitted to Study Abroad Association or 360 GLE™.

**Study Abroad Association - 360 GLE™** shall process personal information as a Data Processor on behalf of the Customer, who uses our services (see "**Information We Receive from Other Sources**" below). For all respective occasions above we ensure that we comply with existing Data Protection Laws.

If one cannot, or will not, provide us with the personal information we reasonably require to ensure the safety of all users and success of the program, such an individual may be excluded from accessing the platform.

### Personal Data

"**Personal Data**" is information or pieces of information that could allow one to be identified, for example:

- First Name, Last Name, school email address and personal email address
- Technical information, e.g. IP address, browser and device data, information collected through cookies
- Details of your visits to our Website, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time), length of visits to certain pages, and page interaction information (such as scrolling, clicks, and mouse-overs), details of whether you are using the Website or the 360 GLE™ Platform.

## How Personal Data is collected

- **Online:** Registration form on **Study Abroad Association - 360 GLE™** platform.

*Personal Data is also collected through:*

- **Cookies.** “Cookies” are pieces of information that a website transfers to your computer’s hard disk for record-keeping purposes. We use both session and persistent cookies. The use of cookies is an industry standard, used to provide useful features for customers. Cookies by themselves, do not personally identify users, although they do identify a user’s computer. We may append contact information gathered from third parties to cookie data that we collect. Cookies allow a web server to transfer data to a computer or device for recordkeeping and other purposes. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies. If you do so, however, you may not be able to take full advantage of our website. To learn more about cookies, please visit <http://www.allaboutcookies.org/>.
- **Browsing our sites.** We may also collect information about the use of our services through your browser to trace activity on our site, such as your IP address, Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version, service provider, time of visit, and page(s) visited.

## How do we use Personal Data?

Use of personal information under certain data protection laws must be justified under one of a number of legal “grounds” and the Customer is required to set out the ground in respect of each use of your Personal Data in their Privacy Policy. These are the principal grounds that justify the use of your Personal Data:

- Consent: where you have consented to the use of your information (you are providing explicit, informed, freely given consent, in relation to any such use and may withdraw your consent in the circumstance detailed below by notifying Us or the Customer);
- Study Abroad Association - 360 GLE™ may also use Personal Data
  - To analyze and improve our offers by identifying usage trends and improving the Study Abroad Association - 360 GLE™ Products experience.
  - To send updates regarding new features within the platform and share important platform updates across users.

We will not sell your personal data (or any other data you provide us with) to third-parties; however, we reserve the right to share any data which has been anonymised to improve the Platform.

### How do we share Personal Data?

Your passwords are stored on **Study Abroad Association - 360 GLE™** servers in encrypted form. We do not disclose your account details to anyone except when legally required to do so. It is your responsibility to keep your password secure. Unfortunately, the transmission of information via the internet is not completely secure. Although the Study Abroad Association will do its best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent any unauthorized access.

### Security

SAA uses appropriate organizational, technical and administrative measures to keep **Study Abroad Association - 360 GLE™** platform user's Personal Data under our control accurate and up-to-date, as well as to protect the Personal Data against unauthorized or unlawful processing and the accidental loss, destruction or damage of the Personal Data.

### Updates to this Privacy Policy

Our Privacy Policy may change from time to time. Any material changes to this policy will be posted on our webpage to keep users aware of what Personal Data is collected, how it is used, and under what circumstances it will be shared. It is the user's responsibility to review this Privacy Policy each time Personal Data is provided to us as the policy may have changed.

## CONTACT US

If you have questions about this Privacy Policy, please contact us

[philip@studyabroadassociation.com](mailto:philip@studyabroadassociation.com)