



# Privacy Policy

Last Updated: 20 March 2023



## Purpose

### 1. About This Privacy Policy

- 1.1. The website [www.thinkpacific.com](http://www.thinkpacific.com) (the Site) is operated by Think Pacific Limited (“we”, “us”, “our”), a company incorporated in England and Wales under company number 05990751. Our registered office is at Rievaulx House 1 St. Mary's Court, Blossom Street, York, England, YO24 1AH
- 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, Think Pacific Limited acts 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.
- 1.4. 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.
- 1.5. Think Pacific Limited is registered with the Information Commissioner's Office. Registration number: Z1454811
- 1.6. We may modify this Policy from time to time. We will use reasonable endeavours to notify you of any material amendments to this Policy by placing a clear notice about them on this Site or by other means. Please review this Policy whenever you use this Site as any changes apply from the date that we make them
- 1.7. This policy was last updated on the **20 March 2023**

### 2. How to contact us

- 2.1.** If you have any questions about this Policy or your personal information, please contact us at [info@thinkpacific.com](mailto:info@thinkpacific.com) or on +44 (0)113 335 9919 or write to us at Think Pacific, 15 Queens Square, Leeds, LS2 8AJ

### **3. What information do we collect?**

- 3.1.** We collect, store and use the following personal information about you:
  - 3.1.1.** Information that you provide to us when registering with this Site or in relation to purchasing our products and services (including your name, email address, and other contact details)
  - 3.1.2.** Information that you provide to us for the purpose of subscribing to our notifications, newsletters or bulletins;
  - 3.1.3.** Information about you that your associated university or organisation provides to us.
  - 3.1.4.** Information contained in or relating to any communications that you send to us through this Site or by other means (including the content and metadata associated with the communication);
  - 3.1.5.** Information collected about your device and your use of this Site (including your IP address or other device ID, browser type and version, operating system, referral source, length of visit, page views and Site navigation paths);
  - 3.1.6.** Information collected through cookies and similar technologies.
  - 3.1.7.** Any other personal information that you choose to send to us. Where the information you provide relates to someone else, you must tell them how we will use their information in accordance with this Policy.

### **4. How will we use your personal data?**

- 4.1.** We will use your personal information for the following purposes:
  - 4.1.1.** To provide you with the services, perform our contract with you and fulfil your requests;

- 4.1.2.** To administer and improve this Site and our products and services;
- 4.1.3.** If you consent, to contact you with information, newsletters, bulletins and marketing materials about our products and services, including by email, telephone and post;
- 4.1.4.** For internal research and development purposes and to improve and test the features and functions of our products and services;
- 4.1.5.** To report to your associated university (if applicable) about our programmes and services;
- 4.1.6.** To conduct and store site usage analytics, statistical and trend analysis and market research.
- 4.1.7.** To investigate and respond to any queries or complaints about this Site, us or our business;
- 4.1.8.** Where relevant, to establish, exercise or defend legal claims;
- 4.1.9.** To meet applicable legal, regulatory and compliance requirements.

## **5. Sharing your personal information**

- 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.
- 5.2.** We may share information with associated or affiliated companies including Think Pacific Foundation (Fiji), for internal administrative purposes.
- 5.3.** We work with parties who provide products or services to us, including data hosting on our CRM, server, 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, Think Pacific Members or partners and university or government funding partners etc. We may share your personal data with one or more of these third parties for the purpose of making our services available to you.

- 5.4.** We may share information 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.
- 5.5.** 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.
- 5.6.** In the event that our business is sold or integrated with another business, your personal information may be disclosed to our advisers, a prospective purchaser and any prospective purchaser's advisers and will be passed to the new owners of the business.
- 5.7.** 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. Use of cookies and similar technologies**

- 6.1.** We and our third party service providers may use cookies and similar technologies to collect information about, and relevant to, your usage of the Site. Cookies are small pieces of information sent by a web server to a web browser which allow the server to uniquely identify the browser on each page.
- 6.2.** We use (or will use in future) the following categories of cookies (or other technologies having similar function and effect) on this Site from time to time:
  - 6.2.1.** Strictly necessary cookies: These cookies are essential for the operation of our service and cannot be switched off. The Strictly Necessary cookies include those connected with logging in, filling in forms, saving your privacy preferences and certain essential performance and analytics cookies. You can set your browser to block or alert you about these cookies, but some parts of the site will not work properly if you do. All data collected by these cookies is anonymised and no personal information is stored.

- 6.2.2.** Performance cookies: These cookies help us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to see how visitors interact with and move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will only collect limited essential information about your visit to our site, and will not be able to properly monitor the performance of our service on the site.
- 6.2.3.** Functional cookies: These cookies enable us to provide you enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some of the services on our site may not function properly.
- 6.2.4.** Targeting cookies: These cookies may be set through our site by third parties such as YouTube. Targeting cookies may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising on those third party sites.
- 6.2.5.** Security cookies: These cookies form part of our security features, for example, by helping us detect malicious activity and violations of our Terms and Conditions and agreements with subscribers for our products and services.
- 6.2.6.** Social media cookies: These cookies allow you to share your activity on the Site on social media such as Facebook and Twitter. These cookies are not within our control. Please refer to the privacy policies of the social networks in question for information regarding how their cookies work.
- 6.3.** If you want to delete any cookies that are already on your computer, please refer to the help and support area on the toolbar of your internet browser. Most browsers will tell you how to stop accepting cookies and disable existing cookies.
- 6.4.** Please note that by deleting our cookies or disabling future cookies you may not be able to access this Site or certain areas or features.
- 6.5.** To find out more about cookies please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **7. Third party links**

- 7.1.** This Site may 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

## **8. Updating your personal information**

- 8.1.** You may review, correct, update or change your personal information at any time by contacting us using details provided in section 2.
- 8.2.** You can unsubscribe from marketing communications by using the unsubscribe link in those communications.

## **9. Data protection principles**

- 9.1.** We process your personal data in accordance with the following principles:
- 9.1.1.** We shall only 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 we collected it;
  - 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;

- 9.1.6. We process personal data securely and in a way that protects against unauthorised or unlawful processing, accidental loss, destruction or damage;
- 9.1.7. 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.
- 9.2. 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. Lawful basis for processing

- 10.1. We will only process personal data when we have a lawful basis for doing so. We will process data under one of the six lawful bases in the GDPR. which are;
  - 10.1.1. **Consent:** You have given consent to the processing of your personal data for one or more specific purposes.
  - 10.1.2. **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.
  - 10.1.3. **Legal obligation:** We need to process your personal data to comply with a legal obligation.
  - 10.1.4. **Vital interests:** The processing is necessary to protect the vital interests of you or another person.
  - 10.1.5. **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.
  - 10.1.6. **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. International data transfers**

- 11.1.** We may be required to transfer your personal information to our service providers as identified above in section 5. In some cases this may involve the transfer of personal information 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.

## **12. Data retention**

- 12.1.** Your personal data will only be retained by Think Pacific Ltd for as long as necessary for our purposes.
- 12.2.** Your information will only ever be retained in accordance with applicable data protection regulation and retention periods of international, federal and state laws.

## **13. Your rights**

- 13.1.** 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.
- 13.2.** Depending on the reason we have your personal data, you have a right to:
- 13.2.1.** Access the personal information we hold about you (commonly known as subject access);
  - 13.2.2.** Request that we correct or complete personal information we hold about you that is inaccurate or incomplete;
  - 13.2.3.** Request that we erase your personal information in some circumstances, or object to our processing it as detailed at paragraph;
  - 13.2.4.** Restrict how we use your personal information, in certain circumstances;

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

**13.2.6.** Where we have asked for your consent to process your data, to withdraw this consent.

**13.3.** 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. If you wish to exercise any of these rights, please contact us using the details in Section 2 of this policy.

**13.4.** 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.

**13.5.** 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/>.

## **14. Monitoring, review and updates**

**14.1.** This policy shall be monitored and reviewed annually and earlier if required to meet any amendments to applicable data protection legislation.

## 15. APPENDIX 1: TABLE OF PERSONAL INFORMATION USAGE

**15.1.** The table below sets out detailed information about 1) The types of information we gather; 2) Our purpose for gathering this data; 3) The lawful basis for processing data; and 4) The retention period

1) TYPE OF PERSONAL DATA	2) PURPOSE OF PROCESSING	3) LAWFUL BASIS FOR PROCESSING	4) RETENTION PERIOD
<p><b>Name and contact details</b></p> <p><i>Applicable for:</i>            Applicants            Alumni            Participants and Members            Partner Organisations</p>	<p>To give access to our network and site 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>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><b>Contact history</b></p> <p><i>Applicable for:</i> Applicants Alumni Participants and Members Partner Organisations</p>	<p>To provide customer service and support</p> <p>To train our staff and ensure that information is pertinent, concise and repeated.</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>
<p><b>Payment information</b></p> <p><i>Applicable for;</i> <i>All customers</i></p>	<p>To take payment for programme fees or give refunds.</p> <p>For fraud prevention and detection.</p>	<p>Performance of contact.</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><b>Purchase history</b></p> <p><i>Applicable for;</i> <i>All customers</i></p>	<p>To provide customer service and support</p> <p>To process any applicable 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 in furthering commercial activity.</p> <p>Consent</p>	<p>For six years since you gave consent, or until you withdraw consent</p>
<p><b>Browser, device and site usage information</b></p> <p><i>Applicable for:</i> All visitors to the Site.</p>	<p>To improve the Site.</p> <p>To protect the Site against fraud.</p> <p>To set any 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>
<p><b>Information collected through cookies</b></p> <p><i>Applicable for:</i></p>	<p>For marketing purposes. To conduct and store site usage analytics, statistical and trend analysis</p>	<p>For legitimate marketing purposes and improve and develop website</p>	<p>For three years since you gave consent, or until you withdraw consent if earlier</p>

<p>All visitors to the Site.</p>	<p>and market research.</p>	<p>Consent</p>	
<p><b>Passport Information including date of birth and nationality.</b></p> <p><i>Applicable for:</i> Applicants Alumni Participants and Members</p>	<p>Passport copies and data are used with consent for visa applications, official registration purposes and during trips as part of travel &amp; safety procedures.</p> <p>Nationality &amp; age verification for travel requirements, visa application requirements and funding eligibility.</p> <p>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 and alternative programmes are possible</p>	<p>Performance of contract 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>
<p><b>Health conditions and history, including mental health or disabilities</b></p> <p><i>Applicable for:</i> Alumni Participants and Members</p>	<p>So we may 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</p>	<p>Legitimate interest of safety and wellbeing for all participants</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>the programme.</p> <p>For insurance purposes</p>		
<p><b>Next of kin contact details</b></p> <p><i>Applicable for:</i> Alumni Participants and Members</p>	<p>For insurance purposes</p> <p>To support participants in case of emergency or to facilitate wellbeing of participants</p>	<p>To ensure participants wellbeing</p> <p>Performance of contract</p> <p>Compliance with legal obligations</p> <p>Consent</p>	<p>For three years since you gave consent, or within 12 months of your programme completing (whichever is earlier) or until you withdraw consent.</p>
<p><b>Insurance claims and related information</b></p> <p><i>Applicable for:</i> Alumni Participants and Members Partner Organisations</p>	<p>For accident, medical or travel insurance claims made in relation to Think Pacific programmes</p> <p>We retain anonymized data in relation to all claims to analyse trends and improve our best practice when handling claims.</p>	<p>Performance of contract Compliance with legal obligations</p> <p>Consent</p> <p>In the interests of training and improving the way in which we handle emergencies and insurance claims for future participants.</p>	<p>For three years since you gave consent, or until you withdraw consent if earlier</p>
<p><b>Ethnicity</b></p> <p><i>Applicable for:</i> Alumni Participants and Members</p>	<p>Recording statistics to improve diversity. For use on our Site or marketing material, or shared with third parties with the purpose of partnership development. When we process the data, we make every effort to assure that all the information is</p>	<p>Consent.</p> <p>Legitimate interest to improve our programme by increasing diversity.</p>	<p>For one year since you gave consent, or until you withdraw consent, or the data is anonymised</p>

	<p>anonymised unless specific consent has been sought from the individual.</p>		
<p><b>Application data - including educational Information and work experience.</b></p> <p><i>Applicable for:</i> Applicants Alumni Participants and Members</p>	<p>For legitimate partnership development needs</p> <p>To improve programmes and expand diversity of student interests.</p> <p>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>Consent</p> <p>Performance of contract</p> <p>Legitimate interest to further our programmes social impact</p> <p>To provide accurate information to potential 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 to improve our programmes,</p>	<p>For six years since you gave consent, or until you withdraw consent if earlier, or the data is anonymised</p>
<p><b>Submission of web forms for scholarships, competitions or surveys</b></p> <p><i>Applicable for:</i> All parties</p>	<p>To run the surveys, competition or promotion.</p> <p>Statistics for use on our Site or for reports, or shared with third parties with the purpose of</p>	<p>Consent</p>	<p>For six years since you gave consent, or until you withdraw consent, or the results are anonymised</p>

	<p>marketing or partnership development.</p> <p>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><b>Reviews, feedback and customer comments</b></p> <p><i>Applicable for:</i> Alumni Participants and Members Partner Organisations</p>	<p>To improve our programmes and services. Where relevant, to establish, exercise or defend legal claims. 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.</p> <p>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><b>Written or video Testimonial, Case Studies &amp; Photos</b></p> <p><i>Applicable for:</i></p>	<p>For marketing purposes, including use on our Site, printed marketing materials or social</p>	<p>Legitimate interest to further our programmes' impact</p> <p>To provide accurate</p>	<p>For an indefinite period since you gave consent, or until you withdraw consent</p>



<p>Alumni Participants and Members Partner Organisations</p>	<p>media channels or to share with partners including universities.</p> <p>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>information to potential members, partner companies and future participants on the impact of our programmes</p> <p>Performance of contract</p> <p>Consent</p>	
<p><b>Personal Information generated in the course of the use of our programmes, products and services</b></p> <p><i>Applicable for:</i> Participants and Members Alumni</p>	<p>For internal research on our programmes and services for development purposes To improve and test the features and functions of our Site or mobile App</p>	<p>Performance of contract Legitimate interest in maintaining our Site and our App and improving our products and/or services generally</p>	<p>For six years since you gave consent, or until you withdraw consent, or the results are anonymised</p>
<p><b>Business licences, registration, insurance &amp; safety certificates</b></p> <p><i>Applicable for:</i> Suppliers, contractors and partner organisations</p>	<p>For health and safety checks in line with our programme quality policies</p> <p>For fraud prevention</p>	<p>Legitimate interest to ensure health and safety or participants and staff</p> <p>Compliance with legal obligations</p> <p>Consent</p>	<p>For six years since you gave consent, or until you withdraw consent if earlier</p>