

# **Privacy Policy**

Free Bird Institute Ltd (the "Company" or "FBL" or "us" or "our" or "we") is committed to ensuring that our dealings with personal information regarding applicants, students, and others whom we deal with complies with the Constitution of the Republic of Fiji, the Online Safety Act 2018 and the Cybercrime Act 2021. This policy explains how we manage your personal information.

#### 1. Personal Information

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

The information that we seek to collect about you will depend on the services that we provide. If you do not allow us to collect all the information we request, we may not be able to deliver all those services to you effectively and may not also allow us to carry out any service to you.

### 2. Types of Personal Information

Our collection of personal information will depend on the service in which you wish to apply for and could include (but not necessarily be limited to) the following:

- (a) Your full name
- (b) Your date of birth
- (c) Your gender
- (d) Your residential and postal address
- (e) Your phone number
- (f) Your email address
- (g) Your passport details
- (h) Your occupation
- (i) Your health information and history including immunisation records
- (j) Your photo(s)

We may request for other personal information from you at any time, however, will advise you on the reason for requesting this information.

#### 3. Reasons we collect Personal Information

We collect your personal information to be able to provide you with our services. This includes:

- (a) Applying for your visa's
- (b) Providing your details for booking your flights
- (c) Providing your details to your homestay families and teachers
- (d) Help managing our services
- (e) Providing your details to the relevant government departments in compliance with local regulatory requirements
- (f) Providing your details to external parties for your examinations (e.g. TOIEC, IELTS exams)



#### 4. Collection of Personal Information

We collect most personal information from you electronically when you visit our website to apply for our services.

We may also collect information from you over the telephone or when you meet with one of our employees in person.

There may be circumstances in which we may collect your personal information from other people or organisations without your involvement. For instance, we may collect your personal information from:

- (a) Your family
- (b) Your lawyers or legal representatives
- (c) The embassies
- (d) Your employer
- (e) Health care providers
- (f) Other publicly available sources, such as public registers.

#### 5. Relevant Laws

We are required by various laws to collect certain identification information about you by the:

- (a) Fiji Financial Transactions Reporting Act 2004
- (b) Tax Administration Act 2009

### 6. Storage of Personal Information

We maintain all personal information that we obtain on secure electronic servers and physically in paper files. We use a range of physical and electronic security measures to ensure the security of the personal information we hold such as:

- (a) all employees being bound by internal confidentiality clauses which require them to keep information confidential and secure
- (b) access to electronic information is controlled through identity and access management
- (c) we regularly review and update our internal policies that align with best business practises globally
- (d) we take reasonable steps to destroy or permanently delete personal information that we are no longer required to maintain by law.



### 7. Parties we disclose your Personal Information to and why

We may share your personal information with other entities within the Free Bird Group as well as parties outside the Group. Generally, we disclose personal information to these parties that help us provide services to you. These parties may include (but not limited to the following):

- (a) The Department of Immigration, Fiji
- (b) The Ministry of Health, Fiji
- (c) The Ministry of Economy, Fiji
- (d) The Reserve Bank of Fiji
- (e) Financial Institutions
- (f) The Company Auditors
- (g) The Fiji Revenue & Customs Authority
- (h) Your representatives (agents, legal adviser, accountant, custodian, financial adviser, executor etc)
- (i) The Fiji Police Force or other government agencies and law enforcement bodies in any jurisdiction
- (j) Homestay families
- (k) Hospitals and medical professions
- (I) Airline Companies
- (m) External Testing Centres

In certain circumstances, we may also disclose your personal information outside the Free Bird Group where:

- we are required or authorised to by law or where we have a public duty to do so
- you may have expressly consented to the disclosure or where the consent may be reasonably inferred from the circumstances.

In certain circumstance, we may also be required to disclose your information overseas which includes international transactions such as currency exchanges and may be required to disclose your personal information to the corresponding international party in order to process the transactions.

## 8. Use of Personal Information for marketing purposes

We will use your personal information to offer you services that we believe may interest you unless otherwise advised by you not to. These may include marketing services to you through various means including (but not limited to) mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising through our Company website. This also includes your photos taken in our schools, campuses, offices or anywhere through activities organised by the Company.

Please contact us if you do not wish to have any of your personal information (including photos) used for marketing purposes.



### 9. Collection of personal information electronically

There may be instances where we may collect information from you electronically such as through internet browsing, mobile or tablet applications. This includes the collection of information about your use of our website which may include the following:

- (a) the date and time of visits
- (b) which pages are viewed
- (c) how you navigate through the site and interact with pages (including fields completed in forms and applications completed
- (d) location information about users
- (e) information above the device used to visit our website
- (f) IP addresses

We use technologies known as cookies when you visit our website. Cookies are small pieces of information stored on your hard drive or in memory. They can record information about your visit, allowing it to remember the next time you visit and provide a more meaningful experience.

Once of the reasons that cookies are used is to offer you increased security. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent to another site or be retrieved by any party outside the Company.

We will never ask you to supply personal information publicly on social media such as Facebook, Twitter, Instagram or any other social media platform that we use. At times, we may invite you to send your details to us via private messaging, for instance, to answer a question about your enrolment or studies. You may also be invited to share your personal information through secure channels to participate in other activities such as competitions.

#### 10. Access to and correction of Personal Information

You can request access to the personal information we hold about you as well as request for corrections to be made. There is no fee for requesting that your personal information be corrected or for us to make any corrections.

However, there may be a reasonable fee charged should you request access to your personal information which would include costs such as locating the information and supplying the same to you.

Hence, please contact us if you either need to have access to your personal information that we hold or to have corrections made to this information.

There may be instances where we will refuse to make changes to your personal information or grant you access to your personal information; however, we will provide you with a detailed explanation outlining our reasons except where it would be unreasonable to do so.

In this case, you may also request that a statement be associated with your personal information stating that you disagree with its accuracy. Additionally, we can also provide you with information on how you can make a contest our refusal and we can provide you more details on how this can be done.



### 11. Resolving your privacy concerns and complains - your rights

If you are concerned about how your personal information is being used or handled or if you have a complaint about a privacy breach by us, please contact us.

We will acknowledge your complaint as soon as we receive this, and we will let you know if we need any further information and or clarification from you in order to resolve your complaint.

We aim to resolve complaints as quickly as possible and strive to resolve them within ten business days. However, some complaints may take longer to resolve and therefore, we will endeavour to provide you with an indicative date in which you can reasonably expect a response.

#### 12.Contact us

You can contact us through the following:

- (a) Emailing us at info@fbi.ac.fj
- (b) Calling us on +679 6720 379
- (c) Visiting our head-office
- (d) Writing to us on P.O Box 11065, Nadi Airport, Nadi, Fiji

### 13. Changes to our Privacy Policy

We continue to make changes to our Privacy Policy as and when changes are made to laws governing this policy in Fiji. As such, we may make changes in the way we handle your personal information, however, you will always be able to find an updated version of our policy on our website at <a href="https://www.fbi.ac.fi/privacy">www.fbi.ac.fi/privacy</a>