



Global Academic Ventures LLC.
Suite 701, 230 E Ohio Street
Chicago, IL. 60611
Tel: +1 312 846 1428
Fax: +1 312 846 1279

This policy was updated on 25 May 2018

Online Privacy Policy

For Global Academic Ventures LLC. (“**GAV**”) and its affiliates (together, the “**GAV group**”), maintaining your trust and confidence is a high priority. We understand that you are concerned with how we collect, share and use your personal information and the steps that we take to safeguard that information.

About us

The GAV group provides education abroad experiences to students predominantly from universities and colleges in the United States, including internships in other countries.

This website is provided by GAV, which is the data controller for data collected through or in connection with this website. To discuss any aspect of this policy or the use of your data by GAV or its affiliates, please contact:

The Privacy Officer
Global Academic Ventures LLC
Suite 701, 230 E Ohio Street
CHICAGO, IL 60611

Tel: +1 312 846 1428
Fax: +1 312 846 1279
Email: privacy@globalacademicventures.com

European Union Appendix

For those in the European Union, please refer to the European Union Appendix at the end of this policy, which sets out your additional rights under the EU General Data Protection Regulation (“**GDPR**”).

Global Academic Ventures’ Security Technology

When you submit information in one of our online forms (such as our payment gateway) we use Secure Sockets Layer (SSL) encryption technology to protect the information that you submit. This technology is designed to protect you from having your information intercepted by anyone other than GAV while it is being transmitted to us. We work hard to adopt security features for our website to ensure your security. In addition to encryption technology, we use other security features such as firewalls, authentication systems and access control mechanisms designed to control unauthorized access to systems and data.

Personal Information

When you use our website we may collect from you information you choose to provide to us, including your name, email address, mailing address, telephone number(s), payment card information, university name, university program name, date of birth, year of graduation, your major or minor and other such information where we believe it is required for ordinary business purposes.



Global Academic Ventures LLC.
Suite 701, 230 E Ohio Street
Chicago, IL. 60611
Tel: +1 312 846 1428
Fax: +1 312 846 1279

We may also collect information about you from additional sources including from the university at which you are enrolled. We may combine this information with the personal and other information we have collected about you under this Online Privacy Policy.

Security Procedures

GAV restricts access to personal information about you to:

- those of our employees and affiliates who need to know that information in order to provide the services you receive from us; and
- those unaffiliated third parties whose access to such information is permitted or required by law and who need to know that information in order to assist us in providing you with the services that you receive from us.

To protect the security of your personal information, we maintain physical, electronic and procedural safeguards for guarding the information we collect about you.

Information We Disclose

We share personal information among our affiliates when we believe it will enhance the services that we can provide.

We may disclose your personal information to non-affiliated third parties as permitted or required by law, such as in response to a subpoena or legal process or in order to complete a transaction which you initiated and authorized.

From time to time, we enter into agreements or arrangements with other companies to provide services to us, or to make services and products available to you, such as with companies who are considering you for an internship. Under these arrangements, these companies may receive your personal information. The companies are not allowed to use personally identifiable information except for the purpose of providing these services.

We may disclose information about you obtained in connection with our efforts to protect against fraud.

We may share your personal information with any person or entity if we have your consent to do so.

Cross Border Sharing of Information

As a global company, we may share your personal information among members of the GAV group or service providers that may be located outside of your home country. Although the data protection laws of these countries may be less stringent than those in your own, GAV will take appropriate steps to ensure that your personal information is handled as described in this policy.

Surveys

From time to time our site requests information via surveys. Participation in these surveys is completely voluntary and you may choose whether or not to participate and, therefore, disclose information. Information requested may include contact information (such as name and address) and demographic information (such as zip code and age level). Survey information will be used for the purposes of monitoring or improving the use and satisfaction of our services and this site.



Global Academic Ventures LLC.
Suite 701, 230 E Ohio Street
Chicago, IL. 60611
Tel: +1 312 846 1428
Fax: +1 312 846 1279

Your Access to and Control Over Information

You can do the following by contacting us at privacy@globalacademicventures.com:

- see what data we have about you, if any;
- change/correct any data we have about you; and
- express any concern you have about our use of your data.

Online Privacy Policy Updates

GAV may, from time to time, make changes to this online privacy policy. We recommend that frequent visitors to our website reread this online privacy policy to learn of any updates and changes which we have made to this policy. All changes will become effective when posted unless indicated otherwise.



Global Academic Ventures LLC.
Suite 701, 230 E Ohio Street
Chicago, IL. 60611
Tel: +1 312 846 1428
Fax: +1 312 846 1279

EUROPEAN UNION APPENDIX

Additional rights

The rights set out in this appendix apply to you if you are in the European Union and the GDPR applies to our use of your data. These rights are in addition to the rights set out in the foregoing body of this policy.

Use of your data

The GAV group uses data it is able to access from outside the EU, predominantly from publicly available sources, to determine contact and general business details for various organisations within the EU (and personnel within those organisations). The GAV group uses this information to attempt to source:

- appropriate European internship opportunities for GAV's student clients from institutions outside the EU; and
- speakers to present to GAV's student clients as part of their European study abroad program,

and for ongoing communications with those organisations and people to administer our programs. We also use any personal data that these organisations and their personnel provide to us directly for these purposes. The GDPR requires that we have a valid legal reason for processing this personal data. Where we have obtained data independently, we believe we have a *legitimate interest* in doing so for the purposes of providing our services and thereby:

- furthering and broadening the education of our student clients; and
- providing organisations the opportunity to participate in internship and study abroad programs (and the direct and indirect benefits for organisations associated with this).

Where you have voluntarily provided your personal data to us, we rely on your *consent* to use and store it as set out in this policy. You may withdraw this consent at any time, and doing so will only affect our ability to lawfully use your data from that point in time. If you wish to participate in our programs as an internship host or as a speaker, but fail to provide some of the information we request of you, our ability to promote or manage the proposed internship or presentation may be restricted.

Transfers to other countries

GAV may share your data with its commonly owned affiliates in Australia, Hong Kong, Singapore and New Zealand. While GAV and the GAV group will take reasonable steps to protect your personal information, the law protecting it in some of these countries may not be as comprehensive as the GDPR. All members of the GAV group store and process data using the services of Dropbox Inc, under agreements that contain GDPR model clauses to protect your information. GAV's website is hosted in Florida, USA, by cleverdot.com, which is subject to data protection laws in the USA but does not warrant compliance with the GDPR.

Sharing your personal information with third parties

If you or your organisation consents to become an internship host for us, you will be requested to complete an internship description document for each position you offer, which is then provided to the candidate student to sign by way of acceptance. The contact and other information you include on this document will therefore be shared with that candidate student and potentially their



Global Academic Ventures LLC.
Suite 701, 230 E Ohio Street
Chicago, IL. 60611
Tel: +1 312 846 1428
Fax: +1 312 846 1279

educational institution. If you agree to contribute to our programs as a speaker, we will request biographical information from you in order to promote the presentation to our student and educational institution clients. These students and institutions will typically be located in the USA or other countries outside the EU, and therefore their use of the information will not be governed by the GDPR. We may also disclose information when we are required by law to do so; when taking legal or other professional advice (on a confidential basis); and when it is relevant to our rights in any legal proceedings.

Retention

The GAV group will maintain your data for as long as it is reasonable to do so to further the purposes of arranging internships and educational presentations for our student clients, or for business and administrative purposes. It may also retain information for reasonable periods not exceeding seven years for record-keeping, compliance and legal purposes.

Your rights

You have a number of rights under the GDPR, including:

- the right to be informed about what parts of your personal data we are processing, for what purposes and with whom it will be shared;
- the right to access, update and/or rectify that information;
- the right to erasure (or 'to be forgotten') when the purposes for which your data were collected no longer apply or you withdraw your consent to their use; and
- the right to restrict how we process the information.

You may object to receiving marketing materials from us, or withdraw a previously given consent to this, at any time.

Please contact us at privacy@globalacademicventures.com to discuss or exercise any of these rights.

Some of your other rights under the GDPR may not be directly relevant in this context; for example, while you have certain rights in relation to 'profiling' and automated decision making, GAV LLC does not engage in these activities.

You have the right to complain to us about our use or holding of your personal information – please contact us at privacy@globalacademicventures.com. You also have a right to make a complaint to the supervisory authority that administers the GDPR in your home country.