



### Curtin Dubai’s Privacy and Data Protection Policy

#### **Introduction**

The policy describes how personally identifiable information ("Personal Information") you may provide on the Curtin Dubai’s Website (<https://curtindubai.ac.ae/>) is collected, stored, processed, and protected. It also describes the choices available to you regarding our use of your Personal Information and how you can access and update this information. This Policy is a legally binding agreement between you ("User", "you" or "your") and the Website Operator ("Operator", "we", "us" or "our"). By accessing and using the website, you are consenting to our collection and use of information in accordance with this policy. It is your responsibility to review this policy carefully before browsing and/or providing any personal data through our sites.

Transnational Academic Group Middle East FZ LLC (hereafter known as ‘TAG-ME’) is the Knowledge and Human Development Authority (KHDA) licensed Education Management Services Provider for Curtin University in Dubai (hereafter known as ‘CUD’). TAG-ME is the Website Operator and collects, stores, and process the personal data of prospective students, enrolled students and visitors in accordance with UAE’s Personal Data protection law 2021, EU’s General Data Protection Regulation (GDPR) 2016 and Australia’s The Privacy Act 1988 (Privacy Act). This policy applies to all personal data, regardless of whether it is in paper or electronic format.

#### **Definitions:**

<b>Personal Data/ Information</b>	Personal Data’ is defined as any data relating to an identified natural person, or a natural person who can be identified, directly or indirectly, through the linking of data, by reference to an identifier such as his name, voice, picture, identification number, electronic identifier, geographical location, or one or more physical, physiological, cultural or social characteristics
<b>Sensitive Information</b>	It’s the personal information about an individual’s racial or ethnic origin, political opinion and affiliation, religious beliefs, health status and sexual status.
<b>Data Subject</b>	It’s the natural person to whom the personal data relates.
<b>Data Controller</b>	It’s the establishment or person who is in the possession of personal data and who determines the purpose and means for processing of the data by virtue of its activity.
<b>Data Processor</b>	It’s the establishment or person who is in the possession of personal data and processes such data on the behalf of data controller.
<b>Data breach</b>	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.
<b>Website Operator</b>	A website operator is one who can act as a website administrator and can change or reconfigure the website.



## Who is collecting and processing your data?

TAG-ME is the Data Controller and Data Processor for the information that is collect when you visit Curtin Dubai's Website. Access to your personal data at TAG-ME will be provided to its employees, partners, third party contractors who require it as part of their work in connection with CUD's operation. Such parties who are granted access to personal information are subject to confidentiality agreements.

Please read the following carefully to understand our practices regarding your personal data and how we treat it.

### **Collection of data from data subject:** Lawfulness, fairness and transparency

TAG-ME collect and hold a range of personal information about the student's prospective students and enrolled students.

- Personal Details: Name, contact information, age, digital images and nationality, etc.
- Previous academic records: The academic transcripts and certificates submitted at the time of enrolling with CUD
- Personal Welfare information: Medical reports and financial information.
- Visa details: relevant documentation and details held, lodged with and received from the UAE Department of Immigrations and other relevant authorities with Dubai Development authority under which TAG-ME & CUD registered and operating.
- Passport details: if provided for identification purposes or for visa purposes.
- English Language proficiency: Whether the student has undertaken a test to determine his or her level of English proficiency, the name of the test and the score the students received for the test.

### **Collection of user data:**

We will automatically collect, store, and use the following categories of data when you browse and search our site:

- technical information, for example, the type of device (and its unique device identifier) you use to access our site, the Internet Protocol (IP) address used to connect your device to the Internet, your login information (if applicable), browser type and version, time zone setting, browser plug-in types and versions, operating system, mobile network information and platform; and
- information about your visit to our site including the full Uniform Resource Locators (URL), click stream to, through and from the website (including date and time), pages you viewed, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We will also collect data that is provided to us by you when you opt to receive information from any of our websites. For example when you register for more information, including without limitation, to become a request information, submit an application, subscribe for newsletters; register for services such as chat rooms or message boards; participate in chat rooms, webinars, blogs or other user forums; respond to polls or surveys; register for contests and other promotional opportunities; or seek help from our customer service or admissions departments.



## Cookies and similar technologies

All of our websites use 'cookies'. A cookie is a small file of letters and numbers that we place on your computer or mobile device if you agree. These cookies allow us to distinguish you from other users of our websites, which helps us to provide you with a good experience when you browse our sites and enables us to improve our websites.

### Types of Cookies we use:

Like many sites, we use "cookies" or other similar technologies to collect GA Data. A cookie is a small data file that writes to your hard drive for record keeping purposes when you visit the website. Cookies allow the website to measure traffic activity on the website and to improve your user experience, for example by remembering your passwords and viewing preferences, allowing you to visit "member only" portions of the website without re-registering, and tracking the progress and number of entries in activities that require registration or entry, such as contests. Similarly, if you have asked us to send you information about upcoming events and promotions, using cookies we collect information about which website pages you have visited and in what order ("Clickstream Data") that may allow us to narrow or limit the materials provided to you based on your prior online activities or preferences. Most browsers are initially set to accept cookies. If you prefer, you can set your browser to refuse cookies or to alert you when cookies are being sent, but it is possible that some parts of the website will not function properly if you do so.

The following types of cookies are used:

- **Strictly necessary cookies** – these are essential in order to enable you to move around the website and use its features. Without these cookies the services you have asked for, cannot be provided.
- **Performance cookies** – these cookies collect information about how visitors use a website, for instance which pages visitors go to most often. We use this information to improve our websites and to aid us in investigating problems raised by visitors. These cookies do not collect information that identifies a visitor.
- **Functionality cookies** – these cookies allow the website to remember choices you make and provide more personal features. For instance, a functional cookie can be used to remember the volume you prefer to use when watching videos on our websites. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.
- **Targeting cookies** – these cookies are used to deliver adverts more relevant to you and your interests. They collect information about your browsing habits. We use targeting cookies to study the information on your visit so that we can make our advertising more relevant to you when you are browsing the web.

In addition, we may use a service that collects data remotely by using so-called "pixel tags," "web beacons," "clear GIFs" or similar means (collectively, "Pixel Tags") embedded in the website's content. A Pixel Tag is an electronic image, often a single pixel (1x1) that is ordinarily not visible to website visitors and may be associated with cookies on the visitors' hard drives. This information is anonymous data.

### Our use of your data

Except for below reasons, your data will be used only for the purpose it was collected.

- The data will be processed so that the TAG-ME can comply with a legal obligation.
- The data will be processed to ensure the vital interests of the individual, that is, to protect someone's life.



The data will be processed to ensure we understand who uses our site and how our site is used and to improve our site and ensure it is secure.

**Google Analytics (GA) DATA:** Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. We may also use Personal Data in aggregate form for purposes of research or analysis. In order to better understand and serve the users of the website and Other Services, TAG-ME often conducts research on its customer demographics, interests and behaviour based on Personal Data we gather. Although this aggregated data may be based in part on Personal Data, it does not identify you personally. TAG may share this type of GA Data with a variety of third parties, including its affiliates, agents, and current and prospective business partners.

We may use GA Data collected from the website for site administration, advertising, and promotional purposes, and we may share such information with various affiliated and unaffiliated entities for such purposes. For example, IP addresses are used for the purposes of system administration and to provide GA Data to advertisers about the volume of use on the website, and Clickstream Data and demographic GA Data may be shared with our advertisers and business partners. We may also enter into agreements with outside companies that possess technology that allows the website to customize the advertising and marketing messages you receive on the website. This data (including Clickstream Data about your activities on our website) may be shared with these companies for this purpose.

### **Social Network**

Our website may include social network sharing widgets / plug-in / cookies / tracking pixel codes that may provide information to their associated social networks or third-parties about your interactions with our web pages that you visit, even if you do not click on or otherwise interact with the plug-in or widget. Information is transmitted from your browser and may include an identifier assigned by the social network or third party, information about your browser type, operating system, device type, IP address, and the URL of the web page where widgets / plug-in / cookies / tracking pixel codes appears. If you use social network tools or visit social networking sites, you should read their privacy disclosures, to learn what information they collect, use, and share.

### **Sharing your data with affiliates**

Personal Data collected website may be shared with our affiliates which include other entities owned or controlled by TAG or its parent companies. We reserve the right to share both Personal Data and GA Data with our affiliates only for the purpose it was collected.

### **Sharing your data with third parties**

We may share your personal data with third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our site terms of use to protect the rights, property or safety of our site, our users, and others.

### **Where we store or use your data**

The data collected through paper or electronic format is stored at third party data centres. These centres store the data as per the privacy laws of their jurisdiction.



### Third party websites

If you follow a link to our websites from third party websites, please note that these websites have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### Retaining your data

We will only retain your data in perpetuity as long as we need it to fulfil our purposes, including any relating to legal, accounting, or reporting requirements.

### Your rights

Under certain circumstances, by law you have the right to:

- **Right access to your data.** This enables you to receive a copy of your data and to check that we are lawfully processing it.
- **Right correction of your data.** This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- **Right erasure of your data.** This enables you to ask us to delete or remove your data under certain circumstances, for example, if you consider that there is no good reason for us continuing to process it.
- **Right to restrict processing of your data.** This enables you to restrict processing of data collected but it allows us to retain your data.
- **Right to suspend processing.** This enables you to suspend the processing of your data.
- **Right to transfer your data to third party:** This enables you restrict the transfer of your data electronically to a third party.

### How do we handle data breaches?

- Data Breaches will be investigated by IT and Compliance teams at TAG-ME.
- TAG-ME will communicate the Data Breach and measures undertaken to be provided to Data Subjects.

Data Breaches and findings of investigation carried out will be notified to the competent authorities as required.

### Changes to this privacy policy

This policy will be reviewed on an annual basis or earlier if required due to changes in the law. We may revise this policy to reflect industry initiatives, changes in the law or technology, or changes in our practices regarding information collection and use.

If we revise the way we collect or use Personal Data, we may provide notice of those changes by either:

- Announcing the change on the home page of the site or
- Taking such other action as we deem appropriate under the circumstances, including without limitation, posting the revised draft of this Privacy Policy on the website. Any changes to this policy will become effective upon posting of the revised Privacy Policy on the Internet, accessible through the website. By continuing to use the website following such changes, you will be deemed



to have agreed to such changes. If you do not agree with the terms of this Privacy Policy, as it may be amended from time to time, in whole or in part, please do not continue using this website.

If you have any queries about how your data is being or has been processed, please contact our Compliance Manager:

Compliance Manager,  
Transnational Academic Group Middle East FZ LLC  
4<sup>th</sup> Floor, Block 10& 11,  
Dubai International Academic City (DIAC),  
Emirates of Dubai, United Arab Emirates (UAE)  
PO Box: 502971  
Telephone: +971 56 838 6856  
Email: [compliance-me@transnatedu.com](mailto:compliance-me@transnatedu.com)