

Last Updated – 31 August 2023

Janison Applicant Privacy Notice

1. About this Privacy Notice

This Privacy Notice (**Notice**) provides job applicants with information about Janison’s privacy practices (“Janison”, “we” “our”) and how we collect, use, process, and transfer personal data.

2. Defined terms

The defined terms we have used in this Notice have the following meanings:

“Applicant” means an individual who has submitted information to Janison (such as a resume or job application) in order to apply to be a Team Member, or who has otherwise given consent to be considered as a candidate for a position.

“personal data” (and “data”) means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“processing” (and “process”) means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

“Team Member” means a Janison employee, director and Board member, as well as members of our extended workforce, including non-executive directors, independent contractors, contingent, or agency workers and interns.

“Janison” means Janison Education Group Limited and its group companies.

3. What Personal Data Do We Collect and Why Do We Collect it?

We have described the main types of personal data we collect and process in the table below:

Data	Description
Identification data	Name, photograph, date of birth, government identifier
Contact data	Home address, telephone, email addresses
Hiring data	Information related to applicant qualifications, past employment, interview notes, references, immigration status and documentation, residency permits and visas, and other official documentation in support of authentication or eligibility for employment
Employment data	Information related to your qualifications, resume/CV, academic/professional qualifications, criminal records data, immigration status and documentation, residency permits and visas
Demographic data	Date of birth, gender, race/ethnicity, veteran status, disability, sexual orientation and gender expression, as well as information relating to other demographic categories.

Systems and asset use data	Information required to provide access to Janison's computing resources such as IP addresses, log files, login information, software/hardware inventories, internal communications and video and audio recordings, and information collected by internal Janison applications provided to employees such as employee communications tools and platforms. This also includes asset allocation data and data used for security and business continuity purposes and information required to use Janison sites including from CCTV, access, and security controls.
Other information you share with us	Information you choose to provide including hobbies, social preferences and personal information pertaining to your references.

4. Why we process your personal data

Hiring	During the hiring process, we process Applicant personal data to determine suitability and eligibility for a role. This includes verifying qualifications. It may also include administering background checks and establishing your right to work in a specific jurisdiction.
Legal requirements	We use this information to comply with laws and regulations (e.g. labour and employment laws, health and safety, tax, anti-discrimination laws) or to exercise or defend our legal rights.
Diversity goals	We use this information as necessary to help us understand the diversity of our workforce and to support core business diversity, equity, and inclusion initiatives.
Day-to-day business operations	We may use this information for other legitimate purposes that are reasonably required for day-to-day operations at Janison, such as managing our relationship with our employees, accounting, financial reporting, business analytics, employee surveys, operational and strategic business planning, mergers and acquisitions, real estate management, business travel, and expense management.

When we collect your personal data, we generally do so directly from you or from a third party when you have given us permission. We will only use this data for the reasons we originally collected it and if we need to use the data for another legitimate business reason, we will notify you directly and get your permission where required. If we ask you to provide personal data not described above, the reason for doing so will be made clear to you at the point we collect it.

5. Jurisdictions with Special Requirements

Legal Basis to Process — If you are from a jurisdiction that requires a legal basis for processing personal data (such as the EEA, UK, or Brazil), Janison's legal basis will depend on the personal data concerned and the context in which we collect it. We will normally collect personal data from you only where we need the data to carry out our employment contract with you, to comply with our legal obligations or exercise rights in the field of employment, or where the processing is in our legitimate interests, provided this is not overridden by your data protection interests or fundamental rights and freedoms. You can see examples of the data we use for our legitimate interests in carrying out our day-to-day business operations in the table above. We also rely on your consent in certain situations — for example, processing sensitive personal data related to your current health status or to provide access to optional social activities.

If we ask you to provide personal data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and let you know whether providing your personal data is mandatory or not, as well as the possible consequences if you do not provide it.

Similarly, if we collect and use your personal data in reliance on our legitimate interests (or those of a third party) that are not listed in the table above, we will make clear to you at the relevant time what those legitimate interests are.

Data Controllers — If you are located in the EEA or the UK, the data controller of your personal data will be the corporate entity that manages the hiring process and/or employs you (e.g. if you are in the UK it will be Janison Education UK Ltd).

6. **Who Do We Share Your Personal Data with and Why?**

We do not sell your personal data or share your personal data for the purpose of behavioural advertising and we do not allow any personal data to be used by third parties for their own marketing purposes. You can see the type of third parties we might need to share your personal data with, and our reasons for doing so, in the table below. We will obtain your consent to any disclosure of your personal data where required by law.

Who we share it with	Why we share it
Team Members, Contractors, and Janison Group Companies	To establish your potential employment with Janison
Consultants and Advisors	To seek legal advice from external lawyers and advice from other professionals such as accountants, management consultants.
Service Providers	To enable third parties to provide services to you on behalf of Janison such as recruitment providers
Partners in Corporate Transactions and their professional advisors	In connection with the sale, assignment or other transfer of all or part of our business
Government Authorities or Law Enforcement	If we in good faith believe we are compelled by any applicable law, regulation, legal process or government authority; or where necessary to exercise, establish or defend legal rights, including to enforce our agreements and policies.
Other Third Parties	To protect Janison’s rights or property; With your consent.

7. **How Do We Handle International Transfers of Personal Data?**

Internal Transfers - As a global organization, we may need to transfer your personal data outside your home jurisdiction to Janison group companies, including our headquarters in Australia, and other countries. These countries may have data protection laws that are different from the laws of your region. We will only transfer personal data to another country in accordance with applicable data protection laws, and provided there is adequate protection in place for the data.

External Transfers — If we need to transfer your personal data outside Janison to a third party who handles that data on our behalf (e.g. advisors) we rely on other agreements, such as Standard Contractual Clauses.

8. What is Janison’s Policy on Monitoring?

We respect your expectation of privacy and only monitor your individual activity if we have a reasonable, proportionate, and legal reason for doing so. Our normal monitoring use cases are outlined below.

9. Type of Monitoring

We monitor the physical activity and presence in our offices of Applicants with surveillance cameras. The data we capture may include Identification data, Employment data, and Systems and asset use data.

10. How Long Do We Retain Your Personal Data?

If you apply for a job with us, we retain your data to determine your eligibility for a current or future role with us. We use Turbo as a third party Service Provider to collect and store your information, they store data in Australia. You can view their privacy policy here: goturbo.com.au/privacy-policy/. The retention periods vary depending on your location and local legal requirements. For example, in Australia we retain Applicant data for two years and in the UK for one year. If you have specific questions about how long we retain your data for other jurisdictions please contact us using the contact information provided in the [Questions?](#) section below.

11. How Do We Secure Your Personal Data?

We use appropriate technical and organizational security measures to protect the security of your personal data both online and offline including the implementation of access controls, firewalls, network intrusion detection, and use of anti-virus software. These measures vary based on the sensitivity of the personal data we collect, process, and store, and the current state of technology. We also take measures to ensure that third parties that process personal data on our behalf also have appropriate security controls in place.

12. How Can You Exercise Your Rights in Relation to Your Personal Data?

You have the right to make choices about your personal data. Where applicable and in certain circumstances, these legal rights include:

- The right to update your data if it’s out of date, incomplete, or inaccurate;
- The right to request confirmation that we are processing your data and be provided with access to the data we process about you;
- The right to have your data deleted;
- The right to object to the processing of your personal data;
- The right to withdraw consent for data you’ve provided to us on a consensual basis; or
- The right to obtain information about the entities Janison has shared your data with.

Please contact your recruiter or email careers@janison.com

13. How Does Janison Handle Disputes Relating to Personal Data?

We hope we can resolve any disputes relating to our data protection practices between us. However, if you have a dispute with us relating to our data protection practices, you can raise your concern or dispute by contacting our Privacy Team via email at privacy@Janison.com

Right to Complain to a Supervisory Authority — While we hope we can resolve any dispute between us, you have the right to lodge a complaint with the supervisory authority in the country where you work or where you consider any data protection rules to have been breached.

14. Questions?

Please direct any questions or inquiries about this Notice to careers@janison.com

15. Changes to this Notice

You can see when this Notice was last updated by checking the "last updated" date displayed at the top. If we update this Notice in a way that impacts your rights, we will provide advance notice to you by sending an email via the address we have on file for you. We will comply with applicable law with respect to any changes we make to this Notice and seek your consent to any material changes if this is required by applicable law.