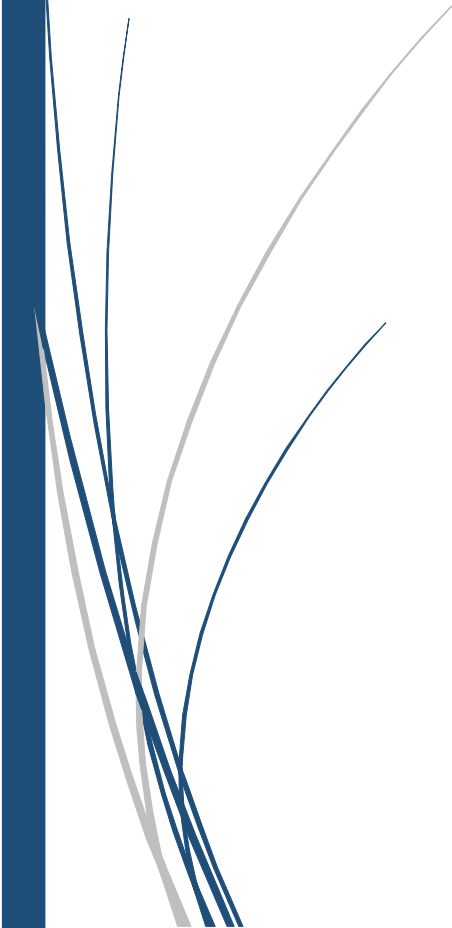




CHARLES TELFAIR
COMPANY LTD
Privacy Notice



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1 Introduction

We respect the privacy of everyone to whom we provide our services. As a result, we would like to inform you regarding the way we would use your personal data and your child's personal data (hereafter collectively referred to as "**Personal Data**"). We recommend you read this Privacy Notice so that you understand our approach towards the use of Personal Data.

By submitting Personal Data to us, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this notice.

This Privacy Notice explains how we obtain, use and disclose Personal Data, as is required by the European Union General Data Protection Regulation (hereafter the "**GDPR**") and the Mauritius Data Protection Act 2017 (hereafter the "**DPA**"). Child Development Centre, (hereafter "**CDC**") is committed to protecting your privacy impact and to ensure that Personal Data is collected and used properly, lawfully and openly.

2 Who we are

The Charles Telfair Campus, (hereafter referred to as "**CTE**"), stands today as a fully-fledged university with over 18 years of experience in the management and delivery of international tertiary education programmes. In addition to operating Curtin Mauritius and Charles Telfair Institute, CTC also operates the child development centre.

We, at the CTE CDC, believe in the importance of a warm, stimulating and caring environment for all. Our qualified educators are dedicated, passionate and take pride in providing exciting learning experiences to match the individual child's strengths, interests and needs. We value fun and play within a child-focused, engaging and safe environment. We believe that frequent educator-child quality interactions are essential for sound development of the child. We respect ourselves, our children, their families, other fellow human-beings and the environment. We work with our staff, families and our academic partner, the Challenger Institute of Western Australia, to develop a model Centre where children will receive the happiest, highest quality education and care possible, and where trainees will learn the best practices to become world-class ECEC educators.

We, as data controller, are responsible for deciding how we hold and use personal data about you and your child. We are required under the GDPR and the DPA to notify you of the information contained in this Privacy Notice.

3 The data we collect

3.1 Collection of Personal Data

We collect and process Personal Data mainly to provide you with access to our services, to help us improve our offerings to you, to support our relationship with you and for certain other purposes explained below. The type of data we collect will depend on the purpose for which it is collected and used. We will only collect data that we need for that purpose.

We collect data directly from you where you provide us with your personal details and that of your child, for example when you purchase child care services from us or when you submit enquiries to us or contact us. Where possible, we will inform you what data you are required to provide to us and what data is optional.

The types of personal data that are collected and processed may include:

Categories of Personal Data	Details
Contact details	First name, surname, physical address, email address, phone number, office phone number, mobile phone number
Individual details	Sex (male/female), nationality, date of birth, age, first language, profession of parents, photos
Identification details	Passport number, identity card number
Financial information	Payment details, bank details
Special categories of personal data	Personal data of your child (under 16 years old), Medical/ health data including data on allergies and medication, information on vaccinations done for children under 3 years old, photos of your child

3.2 Collection of Non-Personal data

We may automatically collect non-personal data about you such as the type of internet browsers you use or the website from which you linked to our website. We may also aggregate details which you have submitted to the site (for example, the products or services you are interested in). You cannot be identified from this data and it is only used to assist us in providing an effective service on this web site. We may from time to time supply third parties with this non-personal or aggregated data for uses in connection with this website.

4 How we use Personal Data

We will use Personal Data only for the purposes for which it was collected or agreed with you, for instance:

- To collect data about the device you are using to view the site, such as your IP address or the type of Internet browser or operating system you are using, and link this to your personal data so as to ensure that the site presents the best web experience for you;
- To help speed up your future activities and experience on the site. For example, a site can recognise that you have provided your personal data and will not request the same data a second time;
- To evaluate the use of the site;
- For monitoring and auditing site usage;
- For admission purposes;
- To carry out our duties and obligations as set out in the Family Information Handbook, including contacting you if your child seems ill, or in the event of any incident, etc.;
- For audit and record keeping purposes, including keeping a history of payment;
- To notify you about changes to our service;
- To respond to your queries or comments;
- To comply with legal and regulatory requirements which apply to us, or when it is otherwise allowed by law;

- In connection with legal proceedings;
- To contact you regarding services which may be of interest to you, provided you have given us consent to do so or you have previously requested a service from us and the communication is relevant or related to that prior request and made within any timeframes established by applicable law;
- For marketing purposes, where photos/ videos of your child will only be used with your explicit consent.

5 Disclosure of personal data

We may disclose your personal data to our business partners or service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may share your personal data with, and obtain data about you from

- Third parties for the purposes listed above (including lawyers, bankers, consultants and auditors who provide consultancy, banking, legal and accounting services);
- Other companies for the purposes listed above when we believe it will enhance the services we can offer to you, but only where you have not objected to such sharing.

We may also disclose your data:

- Where we have a duty or a right to disclose in terms of laws and regulations;
- Where we believe it is necessary to protect our rights.

6 International transfers

The third parties to whom we may disclose your personal data may be located outside of Mauritius. Those transfers would always be made in compliance with the GDPR and the DPA.

If you would like further details of how your personal data would be protected if transferred outside of Mauritius, please contact our Data Protection Committee (hereafter the “**DPC**”) by referring to section 12.

7 Personal data security

We are legally obliged to provide adequate protection for the personal data we hold and to stop unauthorised access and use of personal data. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal data is secure.

Our security policies and procedures cover:

- Acceptable usage of personal data;
- Access to personal data;
- Computer and network security;
- Governance and regulatory issues;
- Investigating and reacting to security incidents.
- Monitoring access and usage of personal data;
- Physical security;

- Retention and disposal of data;
- Secure communication;
- Security in contracting out activities or functions.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal data that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal data agrees to treat your data with the same level of protection as we are obliged to.

8 Your data protection rights

Under the GDPR/ DPA, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

8.1 Your right to erasure of your Personal Data

You have the right to ask us to delete Personal Data in certain circumstances:

- When we no longer need your Personal Data;
- If you initially consented to the use of your Personal Data, but have now withdrawn your consent;
- If you have objected to us using your Personal Data, and your interests outweigh ours;
- If we have collected or used your Personal Data unlawfully; and
- If we have a legal obligation to erase your Personal Data.

Where we collect Personal Data for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect data from accidental or malicious destruction, when we delete data from our services we may not immediately delete residual copies from our servers or remove data from our backup systems.

8.2 Your right of access to your Personal Data

You have the right to request a copy of Personal Data we hold about you or your child. To do this, simply contact our DPC (refer to section 12) and specify what data you would like. We will take all reasonable steps to confirm your identity before providing details of your personal data.

You will not have to pay a fee to access your Personal Data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

8.3 Your right to rectification of your Personal Data

You have the right to ask us to update or correct your Personal Data if you think it is inaccurate or incomplete. We will take all reasonable steps to confirm your identity before making changes to Personal Data we may hold about you. We would appreciate it if you would take the necessary steps to keep your Personal Data accurate and up-to-date by notifying us of any changes we need to be aware of.

8.4 Your right to restriction of processing

You have the right to ask us to limit how we use your Personal Data. If necessary, you may also stop us from deleting your data. To exercise your right to restriction, simply contact our DPC (refer to section 12), say what data you want restricted and state your reasons. You may request us to restrict processing of your Personal Data in the following circumstances:

- If you have contested the accuracy of your Personal Data, for a period to enable us verify the accuracy of the data;
- If you have made an objection to the use of your Personal Data;
- If we have processed your Personal Data unlawfully but you do want it deleted;
- If we no longer need your Personal Data but you want us to keep it in order to create, exercise or defend legal claims.

8.5 Your right to object to processing

You also have the right to object to us processing your Personal Data where your data is being used:

- For a task carried out in the public interest;
- For our legitimate interests;
- For scientific or historical research, or statistical purposes; or
- For direct marketing.

You should contact our DPC (refer to section 12) to inform that you are objecting to any more processing of your Personal Data and state in your objection why you believe we should stop using your data in this way. Unless we believe we have strong legitimate reasons to continue using your data in spite of your objections, we will stop processing your data as per the objection raised.

For any direct marketing communications that we send to you, we will provide you with the data and means necessary to opt out. You can opt out of receiving communications from us at any time.

8.6 Your right to data portability

The right to data portability allows you to ask for transfer of your Personal Data from one organisation to another, or to you. The right only applies if we are processing information based on your consent or performance of a contract with you, and the processing is automated. You can exercise this right with respect to information you have given us by contacting our DPC (refer to section 12). We will ensure that your data is provided in a way that is accessible and machine-readable.

9 Definition of Personal Data

Personal Data is any data from which you or your child can be identified and which relates to you or to your child.

10 Changes to this notice

This Privacy Notice may be updated from time to time: this version is dated **[11 November, 2024]**.

11 How to contact us

We have appointed a DPC to oversee compliance with and questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact us using the details set out below: dpc@cte.ac.mu

You have the right to complain to with a supervisory authority if you believe we have not handled your request in an appropriate manner.

CONSENT TO USE OF PERSONAL DATA

Child Development Centre (hereafter “CDC”) collects your personal data and that of your child from you when you register with us for childcare purposes. We will only use this data to carry out the processes for the purpose for which you registered with us. We will protect your personal data and that of your child in accordance with our Privacy Notice and the provisions of the GDPR/ DPA.

CDC will ensure that you, either as the data subject or as the legal guardian/ parent of the data subject, are made aware of data being collected. If the data has not been collected directly from you, the source of collection will be provided together with name and address of the party. The purpose of collection will be provided.

Information relating to the following will also be provided where relevant:

- Whether the supply of data is voluntary or mandatory;
- The consequences of failing to provide data;
- The legislation requiring the collection of data;
- If data is to be transferred to another country, information relating to the laws that will protect the data.

You may withdraw your consent to CDC as regards the disclosure & processing of your personal data or that of your child for any particular purposes at any time. Should you avail yourself of this right, you will need to notify our DPC in writing using the details set out below: dpc@cte.ac.mu

If you withdraw your consent, we may not be able to provide you with certain services and you will be informed accordingly. However, notwithstanding the withdrawal of your consent, your personal data and that of your child may still be processed by CDC in the performance of its statutory duties.

For more details explaining how we use your personal data and that of your child, please read our full Privacy Notice available at www.cte.ac.mu

If you do not agree with the terms of our Privacy Notice, you may choose not to provide any personal data but this may impact on our ability to support you as a customer.

(Please tick the box if you agree)

I consent to CDC processing my personal data and personal data of my child, as outlined in CDC’s Privacy Notice and Consent to Use of Personal Data.

Date: ____/____/____

Name of child: _____

Name of Mother: _____ Name of Father: _____

Mother’s Signature:

Father’s Signature: