

PRIVACY POLICY

Visa and Relocation Services Ltd t/a International Visa and Relocation Services (or 'International Visas') understands that our clients are concerned about maintaining the privacy and security of the personal information that we receive and process on their behalf, and would like such processing to be open and transparent to both clients and employees.

Accordingly, this Privacy Policy and Notice ("Privacy Notice") is intended to inform you about our online and offline privacy practices and describes the types of personal information we collect, how we may use that information and with whom we may share it in relation to the client services we provide.

This Privacy Notice also describes the measures we take to protect the security of the information that we receive and process relating to you.

In addition, we provide information on how to contact us:

- (1) to access, correct, or delete your personal information;
- (2) to exercise choice regarding the processing of your personal information in accordance with applicable laws; and
- (3) to ask any questions you may have about our privacy practices. Where we refer to "employer" below, it is in circumstances where companies or other corporate organisations have engaged us to act on their behalf.

Information We Collect and How We Use It

PERSONAL INFORMATION WE COLLECT ABOUT YOU

For purposes of providing immigration consulting and advisory services, International Visas may collect certain personal information about you and, if required, your family members and employer. In certain circumstances, we may not be able to provide you with the immigration consulting or advisory services requested if we are not provided with all relevant personal information.

We set forth below the ways in which information may be provided to us and the types of information that may be necessary for immigration services and visa processing. We also tell you the purposes for which we may use the information that we receive.

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CLIENT SERVICES

For the purpose of providing client services, International Visas may collect and process personal information such as your name, address, telephone number, date of birth, marital status, passport number, employment history, educational background, tax status, employee number, job title and function, and immigration status.

We may obtain the personal information from a number of sources, such as online contact forms you complete, emails you send us or other communications between us. In addition, we may obtain personal information from third-party sources, such as former employers, educational institutions you attended and your current or prospective employer.

We use this information to provide immigration consulting and advisory services, such as:

- (1) analysing, completing and processing immigration, visa and related filings and submissions to relevant government agencies; (
- (2) assisting with relocation and other immigration issues; and
- (3) providing access to online case-management tools, where applicable.

INFORMATION REQUESTS

If you request information about our services, you may choose to provide personal information such as your name, address, email address and telephone number. We use your information to respond to your request.

OTHER USES OF INFORMATION

We may use personal information we collect for other purposes, such as client and International Visas administration, data analytics, and compliance with applicable laws and our internal policies and procedures.

SENSITIVE PERSONAL DATA

Certain categories of personal information may be considered "sensitive" and are subject to a higher level of data protection. These categories may include race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation, physical or mental health or condition, and data relating to offenses, and/or criminal convictions.



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In the context of the services we provide, International Visas may collect sensitive personal data in limited circumstances, for example when such data are necessary to comply with the legal obligations of the country in which you are seeking a visa or work permit. For instance, we may need to ask whether you have been previously convicted of any criminal offences or other personal matters when the local applicable immigration laws would require such data in an application.

INFORMATION WE COLLECT BY AUTOMATED MEANS

We may collect certain information by automated means for our own purposes when you visit our websites or web-based interfaces, such as how many users visited our sites and the pages accessed. By collecting this information, we learn how to best tailor our websites to our visitors. We may collect this information through "cookies" and IP addresses.

COOKIES

Like many organizations, we may use "cookies" on our websites. Cookies are bits of text that are placed on your computer's hard drive when you visit certain websites. We may use cookies to tell us, for example, whether you have visited us before or if you are a new visitor and to help us identify site features in which you may have the greatest interest. Cookies may enhance your online experience by saving your preferences while you are visiting a particular site.

Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. Please note, however, that without cookies, you may not be able to take advantage of all our website features.

LOG FILES, USAGE DATA AND IP ADDRESSES

Log files are web server files (containing information such as domain name or IP address, URL, http response code, or the date and duration of your visit) that are automatically created when an Internet user visits a website. An IP address is a unique identifier that certain electronic devices use to identify and communicate with each other on the Internet. When you visit our website, our servers log your IP address. In combination with other data, this information helps us understand which features are of interest to our visitors and the regions of the world where these visitors are located. In addition, log files help detect disruptions that may interfere with the provision of our website.



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INFORMATION WE SHARE

We do not disclose information except as described in this Privacy Notice.

We will not sell, share, transfer, rent, use, or distribute your information for purposes other than those disclosed here unless required by law or as authorized by you or your employer. We may share the information you provide among our subsidiaries, affiliates and your employer or a third party as your employer instructs us, as appropriate or necessary in connection with the services. In addition, as part of the immigration consulting and advisory services we have been directed to provide, International Visas may disclose personal information to government agencies, your former, current, or prospective employer and its related entities. We may also share the information with certain service providers we have retained in connection with the services we provide, such as translators, education evaluation services, couriers, or other necessary entities. We take steps to require that service providers protect the information consistently with this Privacy Notice. These service providers are authorised to use the information only as necessary to perform services on our behalf or to comply with law or legal process. Where we have knowledge that a service provider processes your personal information in a manner contrary to this Privacy Notice, we will take reasonable steps to prevent or stop the processing.

In addition, we may disclose information about you:

- (1) if we are required to do so by law or legal process, (
- (2) to law enforcement authorities or other government officials,
- (3) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss in connection with an investigation of suspected or actual illegal activity;
- (4) if this is necessary to protect the vital interests of any person.

HOW WE PROTECT PERSONAL INFORMATION

We seek to ensure that any personal information that we hold about you is accurate, complete, current and otherwise reliable based on data you or an employer provide in order to provide immigration consulting and advisory services. We seek to collect personal information that is adequate, relevant and not excessive for these purposes.

We maintain appropriate administrative, technical, and physical safeguards to protect against loss, misuse or unauthorized access, disclosure, alteration, or destruction of personal information.

We educate our employees and strive to maintain appropriate standards of conduct with regard to the protection of personal information.

We take steps to require that third parties who assist in our provision of services abide by all applicable privacy and data protection laws and prohibit them from using your information other than in connection with the services they have been engaged to provide.



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INFORMATION WE TRANSFER

To provide immigration consulting and advisory services, we may transfer the personal information we collect to several countries, such as Australia (for Skilled Migration Scheme applications) or any other country, which may not provide the same level of data protection as the laws in the country in which you reside. When we transfer your information to other countries, we will use, share and safeguard that information as described in this Privacy Notice.

YOUR CHOICES AND RIGHTS

As set out above, International Visas may collect certain information about you for purposes of providing immigration consulting and advisory services. In the unlikely event that International Visas wishes to use this information in a way that is incompatible with these purposes, we will notify, as applicable, either you or your employer. If you or your employer inform us that you do not wish your personal data to be used for this purpose then we will not use it for this purpose. If sensitive personal information is involved we will only use your information for the new purpose if you actively communicate your consent to this processing to your employer or us, as applicable, in accordance with the requirements of applicable laws. We will follow the identical procedure if we disclose personal information to third parties that are expected to process the personal information for their own independent purposes.

We also will assist our clients to provide you or provide you directly, as applicable, with reasonable access to your personal information and, where appropriate, with the ability to review and correct inaccuracies. We will use reasonable efforts to assist you or your employer to respond to an access request or, where required under law, to respond directly to a valid access request within a reasonable period of time. To help protect your privacy and provide security, International Visas takes reasonable steps to verify your identity before granting access to information. To exercise these rights, please contact us.

UPDATES TO OUR PRIVACY NOTICE

This Privacy Notice may be updated periodically without prior notice to you to reflect changes in our information practices. We will post a notice on our applicable websites or materials to advise of any significant changes to our Privacy Notice and indicate in the notice when it was most recently updated. While this Privacy Notice is designed to comply with the most stringent data privacy laws and represents "best practices," in certain countries additional or different procedures not inconsistent with this Privacy Notice may apply as necessary to satisfy local legal requirements.



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HOW TO CONTACT US

If you have any questions or comments about this Privacy Notice, please contact us by email at info@ivars.com.

You also may write to us at:

Managing Director International Visa & Relocation Services 314 Midsummer Court Midsummer Boulevard Milton Keynes MK9 2UB UK

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