



The Mind Lab Privacy Policy

Purpose:

The purpose of this policy is to ensure that all reasonably available measures are in place to protect the privacy of information collected. The Mind Lab Limited (including subsidiary Tech Futures Lab¹) fully complies with obligations under the Privacy Act (1993).

Scope:

1. This policy applies to all staff members and processes at The Mind Lab (including any programme delivery partners). The Mind Lab (TML) must ensure that, when using or dealing with personal information relating to other staff members, users, contractors or any other individuals, they comply fully with this policy.
2. This policy applies to all personal information provided, whether in person or via other means, including through The Mind Lab sites (including themindlab.com, applynz.force.com, techfutureslab.com, and the student portal).
3. This policy applies to information collected from all users of The Mind Lab's products and services including adults, children, parents and guardians.

Privacy Policy Statements:

The Mind Lab is dedicated to treating personal information with care, trust and respect. This Privacy Policy is designed to provide transparency into privacy practices and principles in a format that users can navigate, read and understand. This Privacy Policy covers the collection, use and disclosure of information by TML, the precautions TML takes, how individuals can access their personal information, and how complaints can be made if privacy is thought to have been breached.

This policy covers the following:

1. Collection of personal information
2. Storage, use and disclosure of personal information
3. Cookies and data security
4. User access to and correction of personal information

¹ Tech Futures Lab is a wholly owned subsidiary of The Mind Lab. All policies and procedures of The Mind Lab also apply to Tech Futures Lab. Terms and Conditions, Policies and Declarations that relate to The Mind Lab also relate to Tech Futures Lab unless expressly stated otherwise.

1. Collection of Personal Information

- a. The Mind Lab collects personal information about users (and where applicable their parents/caregivers) through website registration forms, online accounts and personal transactions over the phone or online. The information may include name and contact details, date of birth, application details, payment details and any additional personal information that is important for The Mind Lab to be aware of (e.g. medical conditions, learning issues for our school programmes).
- b. We gather various information depending on the site and/or programme, including:
 - i. Registration information created by setting up an account on The Mind Lab websites (sites), including first name and surname, date of birth, email address, username and password.
 - ii. Personal information that is required for enrolment in postgraduate programmes including identification, academic and immigration information if relevant.
 - iii. Personal information provided to us through any other method (including without limitation correspondence and discussions whether on The Mind Lab sites or via other means).
 - iv. Location information either provided by a mobile device or associated with an IP address, where The Mind Lab is permitted by law to process this information.
 - v. Usage, viewing and technical data, including a device identifier or IP address, when users visit The Mind Lab sites.
 - vi. Aggregated data, which tracks traffic to The Mind Lab sites, and cookies, which are pieces of information transferred to a user's computer hard drive for record keeping (such as preferences on The Mind Lab sites).
- c. If a user provides The Mind Lab with personal information about another person, the user must ensure that they are authorised to disclose that information to The Mind Lab and that, without taking any further steps required by applicable data protection or privacy laws, The Mind Lab may collect, use and disclose such information for the purposes described in this privacy policy.

2. Storage, Use and Disclosure of Personal and Academic Information

- a. All personal registration information will be stored on The Mind Lab servers. Additional individual access through the websites may be logged by The Mind Lab servers. This could include:
 - i. browser's internet address
 - ii. server's address
 - iii. domain name
 - iv. IP address
 - v. date and time of the visit to the site

- vi. the pages accessed and documents downloaded
 - vii. the type of browser used
- b. The Mind Lab may use this information for statistical purposes and for system administration tasks to maintain this service. The Mind Lab does not identify individuals as part of this practice. However, in the event of an investigation, by a law enforcement agency or other government agency, The Mind Lab may exercise its legal authority to inspect relevant server logs.
- c. Personal information collected by The Mind Lab will be held for the purposes of enrolling users and administration. Other purposes may include reporting back to parents/caregivers, celebrating and recording user achievement.
- d. A unique identifier will be assigned to each student, which will be used in conjunction with a secondary means of identification or password.
- e. Staff members and other personnel within The Mind Lab will have access to students' personal information for purposes relevant to normal Mind Lab operations including but not limited to: student recruitment, marketing, admission, enrolment, study, academic progress, tuition fees and charges, establishing and maintaining academic and graduation records, assessment, academic agreements (scholarship providers or sponsors, programme delivery partners), academic advice and support, student services, discipline, security and safety, library and IT services, and records, managing records of graduates, and alumni, and managing and improving the quality of services provided by The Mind Lab.
- f. A student's academic achievements *i.e.* completion of academic qualifications are public record, and The Mind Lab can verify qualification achievements to those who enquire. However, the specific details or individual components of a student's qualification (*i.e.* Academic Transcripts) will not be disclosed by The Mind Lab without the student's consent.
- g. The Mind Lab will use anonymised information (including learning analytics) gained from The Mind Lab student learning activities for academic and marketing purposes, including research and to improve The Mind Lab programme design and delivery. All possible precaution will be taken to ensure that The Mind Lab students, past and present, will not be identifiable as individuals.
- h. In addition, The Mind Lab will survey students for feedback on their experience of The Mind Lab programmes and courses. This data will be anonymised. The Mind Lab may also ask individual and groups of students to volunteer feedback and data (including videos and photographs) for research and marketing purposes.
- i. The Mind Lab uses email addresses to communicate regarding current bookings, surveys, programme or course updates and administrative matters. All recipients are given the option to opt out of receiving promotional emails.
- j. All users will be deemed to have confirmed their acceptance of our privacy policy through the completion of our registration process.
- k. The Mind Lab will not disclose any personal information held to a third party, unless required by law, or except as set out below:

- i. **Service Providers:** The Mind Lab work with third-party service providers who provide hosting, maintenance, backup, storage, infrastructure, payment processing, analysis, marketing and other services for us, which may require them to access information about the user. If a service provider needs to access information about a user to perform services on their behalf, they do so under instruction from The Mind Lab, including abiding by policies and procedures designed to protect your information. Some of these service providers may be located in countries other than New Zealand.
- ii. **Legal Obligations:** In exceptional circumstances, The Mind Lab may share information about a user with a third party if The Mind Lab believes that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce The Mind Lab agreements, policies and terms of service, (c) protect the security or integrity of The Mind Lab sites and services, or (d) protect The Mind Lab, related companies, customers or the public from harm or illegal activities.
- iii. **Sale of our business:** In the event that The Mind Lab proposes to sell the business or any of its assets, The Mind Lab may provide user personal data as part of a database to a prospective buyer solely so that they can consider the purchase of the business. Should The Mind Lab proceed to sell the business (or a material part of it) The Mind Lab may provide user personal data as part of that sale so that the purchaser can continue to operate the business and contact users about their plans for the business.

3. Cookies and Data Security

- a. A cookie is a very small text file that is sent to a browser from our web server and stored on the user's computer. Cookies help provide users with a customised experience without having to re-enter their preferences each time they return to The Mind Lab websites. Customers may disable cookies, however doing so may restrict access to some web pages.
- b. Mind Lab takes all reasonable precautions to guard against unauthorised access to confidential and personal information including the loss, misuse and alteration of the information held by The Mind Lab on its servers. When personal information is no longer required for the purposes for which it was collected, it may be deleted.
- c. The Mind Lab booking system is PCI-DSS compliant. NB. The Payment Card Industry Data Security Standard (PCI DSS) is a set of security standards designed to ensure that companies that accept, process, store or transmit credit card information maintain a secure environment. All payment transactions are encrypted using 256 bit SSL encryption.
- d. The Mind Lab has in place measures to ensure the security of the personal data that is collected and stored about users. The Mind Lab uses all reasonable endeavours to protect personal data from unauthorised disclosure and/or access, including through the use of network and database security measures.

- e. The Mind Lab has put in place procedures to deal with any suspected personal data breach and will notify users and any applicable regulator of a breach where legally required to do so.

4. Access to and Correction of Personal Information

- a. A user may request access to their personal information, by logging in to their Account on the The Mind Lab sites or by emailing privacy@themindlab.com. If a user contacts The Mind Lab by email or phone (+64 09 964 4444), The Mind Lab may need to verify their identity for security purposes. Changes may take up to 10 days to take effect. If a user has questions regarding the specific personal information about them that The Mind Lab holds, they can contact privacy@themindlab.com.
- b. The Mind Lab will hold a user's information for as long as their User Account is active or as is needed to provide services to the user. If a user wishes to cancel their Account or request that The Mind Lab no longer uses their information to provide services, they can contact The Mind Lab at privacy@themindlab.com.
- c. The Mind Lab will hold students enrolment record to comply with [NZQA PTE Enrolment and Academic Records Rules 2012](#). This means enrolment records will be held until at least two years after the completion of the education.

Relevant Documents and Information

- Privacy Act 1993
- Harmful Digital Communications Act 2015
- <https://www.privacy.org.nz/your-privacy/frequently-asked-questions/>
- The Mind Lab Code of Conduct
- [NZQA PTE Enrolment and Academic Records Rules 2012](#)