

1- Overview

TEFL Wonderland-Brilliant Minds is specialized in offering synchronous and asynchronous training courses, facilitation, accessibility, consultation and course development services. The company trades under the names: *Brilliant Minds*, *Brilliant Minds Learning* and *TEFL Wonderland*. The website (TEFLWonderland.com) along with all the displayed or embedded digital content and materials are owned and operated by TEFL Wonderland-Brilliant Minds.

TEFL Wonderland-Brilliant Minds is committed to protecting their learners, customers, employees, consultants and partners from damaging or illegal actions.

While using, processing, and archiving your data, we aim to adhere to the highest industry standards and guidelines for data privacy and protection in Canada and the world, such as Canadian standards of PIPEDA (Personal Information Protection and electronic Document Act) and EU Standards of GDPR (General Data Protection Regulation).

2- Purpose and Scope

This policy sets out the basis on which the data we collect from you, or you provide to us, will be processed by us. Our privacy policy identifies the type of data we collect, the data we do not collect, the way we collect the data, the aim of our data collection. The policy also sets out how we use this data, and how we ensure data privacy.

This policy applies to you and any user of company technology. In all your dealings with TEFL Wonderland-Brilliant Minds, you must ensure that you and anyone you represent is aware of the content of this policy, and that they have granted you their consent to act on their behalf.

3- Responsibility

TEFL Wonderland-Brilliant Minds is the Data Collector and Data Protection Controller and is responsible for your personal data. The Operations and Support Services Manager holds the ultimate responsibility for applying this policy.

We will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood by our entire staff members and contractors.

4- Contact Details

The contact details of TEFL Wonderland-Brilliant Minds are:

Registered Address: 440 Laurier Ave., W., Suite 200, Ottawa, ON K1R 7X6

Telephone Number: +1-514-577-2023

Email Address: info@brilliantmindslearning.com

If you have any question or comment related to this policy or its practice, please contact us by email at: Compliance@brilliantmindslearning.com.

5- Consent

When you provide your personal information, you consent that this data can be used for the purposes described below, and that TEFL Wonderland-Brilliant Minds is an authorized holder of this information. If you choose not to provide us with personal information, you can still use our website; however, you will not have access to certain areas that require registration, neither can you receive certain services or products. When you subscribe to one of our services, products, newsletters, etc., and activate your account, you are providing your consent to occasionally receive information from us. In each communication that will be sent to you, you will have the opportunity to unsubscribe from any further communications. You may also contact us at unsubscribe@teflwonderland.com to express or change your choices.

6- The Data We Collect

The terms 'your personal data' and 'your information' are defined as any information that can be used to identify a certain individual. In your dealings with us, we may collect, use, store and transfer the following types of data:

- Identity Data: This includes your first name, middle name, last name, title, username, password, date of birth, gender, etc.
- Contact Data: This includes your mailing address, postal code, email address and telephone numbers.
- Transaction and Profile Data: This includes your purchases from our website, your course completion percentage, your course grades, your assignments and your communication with us. It also includes your interests, preferences, feedback and responses to surveys.
- Technical Data: This includes your IP address, location, login data, browser type and version, operating system, device you are using, etc.
- Usage Data: This includes information about how you use our website, products and services.
- Marketing and Communication Data: This includes your communication preferences and whether or not you prefer to receive marketing materials from us or our third parties.
- Aggregated Data: This includes statistical and demographic data, which may be derived from your personal data, but is not considered personal data and does not directly or indirectly reveal your identity.

7- The Data We Do Not Collect

- Any Financial Data such as credit/debit cards info – we use the most internationally trusted 3rd parties for payment processing.
- Any data related to your race, religion, health, sexual orientation, etc.

8- How We Collect Your Personal Data

We collect the data from you and about you through different methods including:

- Direct interactions: corresponding with us by post, phone, or email.
- Automated technologies and cookies. Please read our **Cookies Policy** for additional information.

This also includes the personal data you provide us when you:

- Connect with us via social media, blogs, etc.
- Participate in a competition, promotion, survey, etc.
- Use our website and courses.
- Purchase, subscribe to, or download our products, services, newsletters, publications, marketing materials, survey, etc.
- Give us feedback.
- Submit assignments to fulfill course requirements.

9- How We Use Your Data

We will use your personal data only on the following grounds:

- When you have consented to processing your data for one or more of the purposes listed above.
- When it is necessary for entering into a contract between you and TEFL WonderLand-Brilliant Minds.
- When it is required by the law to share your data for compliance with a legal obligation.
- If it is necessary to protect your or another person's vital interests.
- In case we are asked to do so by a government body.
- In case you choose to add your input in our platform(s) – such as comments, posts, reviews/rating, etc.

We will use your personal data for the following purposes:

- For managing and enabling your contracted scope in our environments (such as: learning track, certification track, development track, etc.).
- For managing your account and access.
- For personalizing your experience and our services to you while using our website.
- For communicating with you or with our partners/contractors for the purpose of your contract.
- For processing your purchases – this is done through internationally trusted, third-party payment processing vendor.
- We may share your data when it is necessary for processing the scope of your contract with our partners and vendors.
- We may use your data for analysis, statistics, research, audit requirements, quality and improvement related services, customer care, newsletters and marketing activities. You may unsubscribe or opt-out at any time from our newsletter by clicking on the 'unsubscribe' link or by contacting our team at unsubscribe@teflwonderland.com.

10- How Long We Keep the Data

- We keep students' records archived for an appropriate period to protect your rights and our rights.
- If it is required by the law; we will keep it as long as needed.
- You have the right to correct your data, get a copy of it, or request its deletion/erasure (when applicable).
- Once you are awarded a TEFL qualification, we will keep the data necessary for verifying your certification.
- For analysis and research purposes, we may keep and use the data indefinitely. In this case we will anonymize the data, and it will not be personalized (not associated to you).

11- How We Protect the Data

TEFL Wonderland-Brilliant Minds is strongly committed to protecting your personal data and ensuring that your choices are honored. All personal data is protected, stored behind multiple firewalls on secure servers with restricted access. We have taken the following security measures to protect your data from misuse, loss, disclosure, unauthorized access, alteration, or destruction.

- Applying security policies to our staff and their devices.
- Applying security measures in our website and premises.
- Using virus and intrusion protection.
- Using storage security and network firewalls.
- Restricting access to specific data (the minimum required) to specialized team(s).
- Ensuring segregation of duties (SOD) in our teams' assignments and areas of responsibilities – where and when applicable, the complete data of your profile is not accessible to a single team/team member.
- Monitoring, controlling and preventing any conflict of interests.
- When applicable, anonymizing the data for securing the privacy of your personal information.
- Ensuring the availability of the data and preventing its loss by processing a scheduled backup on a specified frequency and retention policy – regular restoration process is tested.
- Restricting the use of external storage, memory sticks, and any means for copying data.
- Using password-protected databases, environments, emails, documents, etc., and restricting access to authorized personnel.
- Using adequate and appropriate procedures, teams, and resources to enforce the implementation of our policies.
- Developing and following procedures to secure regular monitor, assessment, audit, and update of the maturity measures for our policies.
- Implementing appropriate control measures to prevent unauthorised use, data breach, disclosure, or loss of data. We will notify you in case of a breach where we are legally required to do so.
- Placing limitations on access to your personal data to agents, contractors and other 3rd parties who are in business with us.
- Signing NDA (Non-Disclosure Agreement), (PA) Privacy Agreement, and (DPA) Data Protection Agreement with all our employees and vendors.

Our Data Center:

- Is secured in terms of (hardware, software, network, storage, etc.) and applies advanced security hardening and proactive monitoring to keep our website and customers' data secure and safe.

- Complies with GDPR (General Data Protection Regulation), SSAE-18 (The Statement on Standards for Attestation Engagements – standards for how to handle, operate, and control data related to customers and financial reporting), PCI DDS (The Payment Card Industry Data Security Standard), and SOC (Service Organization Controls).

12- Links to Other Websites:

Our website includes links to third parties' websites, plug-ins and applications. By clicking on those links, you may be redirected to other external environment (not related to our company) and allow those third parties to collect or share data about you. We are not responsible for other parties, we do not control their actions, and we are not part of their policies. We encourage you to read the policies, terms, and conditions of every website you visit.

13- Your Rights

- Request an access to your personal data.
- Request a correction of your personal data – we may need to verify the accuracy of the new data you provide.
- Request the transfer of your personal data to a third party. We will do our best to provide it in a structured, commonly used, machine-readable format.
- Request restriction of processing of your personal data – when and where applicable.
- Withdraw consent at any time where we are relying on consent to process your personal data.
- Request erasure of your personal data, if there is no reason for us to keep it – when and where applicable.
- We continuously monitor and control our social media and blogs for any incorrect, misleading, unauthorized, personal data disclosure, inappropriate or illegal posts.
- If you have any requests, please contact us at: compliance@brilliantmindslearning.com or unsubscribe@teflwonderland.com.

14- Our Rights

- We may request specific information from you to confirm your identity and secure your personal data from disclosure to any person.
- We will do our best to respond to any reasonable and legitimate requests in a prompt manner; however, in some cases, it may take us longer than expected if your request is technically complex.

- We will not charge you for exercising your rights on the data we hold about you; however, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. We reserve the right to refuse to comply with your request in some circumstances.
- We will keep the data for an appropriate period to process the scope of our contract, for certification verification, if it is required by the law, and (if anonymized) for statistics, analysis and research.
- For us to deliver the best service, accurately process your request, improve our service, and for legal, security and fraud aspects in some circumstances; we may monitor, record and archive telephone calls and activities in and around our premises or venues. All recordings and derivative materials are and shall remain our sole property.
- We may request information about your age, gender, current location, recent photo, ID, proof of English proficiency, etc. Such information is essentially required to support your learning and grading processes, enable your certification issuance and delivery, prove your identity, prove your proficiency in English Language, etc. Failure to provide this data in reasonable time will delay, and in some cases cancel, your contract with us – with no liability on us, and you will not be eligible for refund.
- We securely delete the data related to closed contracts from our live environments from time to time. Our live data retention period depends on our business and legal obligations.

15- Review of Policy

We reserve the right to change our policies from time to time when deemed necessary or when required by law. Any changes will be posted on our website, and enrolled users will be notified by email. You will be deemed to have read and accepted our policies, terms and conditions when you are using our website(s), our premises, our venues, or contracted with us.

This policy is reviewed annually. The next review date will be April 2023