



Greystone Institute Privacy Policy

This Privacy Policy (the “Policy”) applies to the collection and use of personally identifiable information (the ‘Personal Information’) gathered through the use of the ILSC Education Group’s websites (the “Websites”), related student app, the ILSC Learning Management System (the “LMS”), and the ILSC landing pages (collectively, the “Other Services”) that are owned and/or operated by the ILSC Education Group, including ILSC Language Schools, Greystone College, and Greystone Institute (collectively, “ILSC”). ILSC is committed to protecting your privacy! In this Policy, ‘we’, ‘our’, or ‘us’, refers to ILSC and its subsidiaries and affiliates. The Policy (i) describes the Personal Information that we may collect through the Websites and the Other Services, (ii) explains the purpose of collecting and the use of such Personal Information, and (iii) explains how and when we may share it.

Limiting Collection

ILSC takes your privacy seriously. Any Personal Information that you provide to ILSC is limited to that which is needed for the purposes identified by us. Personal Information is collected by fair and lawful means only.

Accountability

We are responsible for all Personal Information under our control, whether supplied to us directly by you or by a third party, or that we have provided to a third party for processing. We have established policies and procedures to comply with our Policy, and have designated a Privacy Officer who is responsible for ensuring we comply with privacy legislation. If you need to contact our Privacy Officer regarding your specific privacy questions or concerns, please see the contact information at the end of the Policy.

Collection of Personal Information

Initial inquiries through the Website

Various types of Personal Information may be required from you in order to proceed with an inquiry or enrollment with ILSC or when opting in to an email subscription service. In most cases, this Personal Information includes your name, e-mail address and/or telephone number.

ILSC may send you information regarding our products and services through e-mail. You may choose to receive this information by filling out a contact form on one or more of our Websites and giving us your consent. There may be times where, following your request, you may be contacted by a representative of ILSC to further assist you with any questions or concerns you may have.

Customer Relationship Management (CRM)

Through our cloud-based CRM, Personal Information that may be stored includes your name, email address, telephone number and nationality. Our in house team uses Personal Information to respond to inquiries. Unless required by law, we do not share this Personal Information with third party agencies.

Facebook remarketing

Facebook may use cookies to display ads based on past visits to the Website. Any data collected will be used in agreement with our own Policy as well as Facebook's privacy policy. You can set preferences for how Facebook advertisers to you within your Facebook profile—instructions are available via Facebook.

Google Analytics

Through Google Analytics, ILSC can track the location of website traffic and the source of our visitors browsing (desktop, tablet, mobile etc.) as well as the total time spent on the Website. IP addresses, URLs visited, and related information is recorded for all site visitors for the purpose of site traffic analytics and captured as part of normal operation in our server logs. Cookies are used to track logins, sessions, and collect anonymous traffic data.

This information is used to understand our audiences, including where they are from, what they are looking for and how we can best assist them. This information allows ILSC to stay in tune with our audiences and helps to improve our online user experience.

For more information on how Google uses data when you use our Website, the student app and the LMS, please refer to this link: <https://www.google.com/policies/privacy/partners/>

Student app and the LMS

Any Personal Information you provide to ILSC through our student app and the LMS will be used for the sole purpose of responding to your specific questions or concerns. Your Personal Information may be accessible to staff who administer the platforms and the infrastructure. We will ensure that our staff and those acting on our behalf obtain, use and disclose Personal Information collected through the use of our student app and the LMS lawfully and correctly. Unless required by law, we do not share this Personal Information with third party agencies.

Internal database

In the case of student registration, Personal Information that is required includes name, e-mail address, passport information and date of birth. ILSC's internal database stores Personal Information from a completed application form as well as students' schedules, grades and attendance. We will ensure that our staff and those acting on our behalf obtain, use and disclose Personal Information from our internal database lawfully and correctly. Unless required by law, we do not share this Personal Information with third party agencies.

ILSC Education Group & Greystone Institute Landing pages

ILSC occasionally has landing pages, which require basic Personal Information such as name, email address, telephone number, and nationality. Our in-house team will use this Personal Information to respond to inquiries appropriately. Unless required by law, we do not share this Personal Information with third party agencies.

Third party payments



When you make any purchases through our Website, you make that payment to us using our third-party payment tools. We do not collect any payment information from you; we merely process that data in passing it on to our third-party payment providers, for them to process the payment. All credit card information (numbers, expiration dates, CVC number) are managed by our secure payment gateway via our third-party payment tools which work to protect the security of your financial information. When submitting your payment information through our third-party payment tools, please note that they each have their own privacy policy and that we do not accept any responsibility or liability for their privacy policies.

IDENTIFYING PURPOSE

You agree that we may collect and use Personal Information from you and about you for the following purposes:

To communicate with you, including responding to your questions or inquiries in relation to the products and services that we provide through the Website, the Other Services and through our social media channels.

To understand your needs in order to market and remarket products and services to you.

To analyze the suitability of our products and services for you.

To determine your eligibility for our products and services, including to verify your Personal Information through communicating with any references provided by you.

To develop, manage and offer products and services that meet your needs.

To provide you with ongoing service.

To manage and assess our risks, operations and relationship with you.

To meet our legal and regulatory requirements.

To facilitate the processing of payments.

SAFEGUARDS

To support our Websites security, we use spam protection tools from third-party platforms such as Google reCAPTCHA. As a result, when you pass through our Websites, your hardware and software information, such as device and application data and the results of integrity checks, may be sent to these platforms for analysis. You should check the relevant third party website for more information on how they control the dissemination of this data.

Our online payment solutions are available for multiple ILSC services. These are hosted through third-party accredited payment processors, which adhere to specific country and banking requirements. As such, they ensure all security measures are addressed for all customers, ILSC included.

LIMITING USE, DISCLOSURE, AND RETENTION

Unless you consent otherwise or it is required by law, Personal Information can only be used or disclosed by us for the purposes for which it was collected. We keep Personal information only as long as required to serve those purposes.

Personal Information that is no longer required to fulfil the identified purposes is destroyed, erased or made anonymous.

ILSC may internally share your Personal Information for the purposes identified in this policy with its employees, affiliates or other related and affiliated companies in Canada or outside of Canada. Only such companies with legitimate business reasons will have access to your Personal Information and must ensure that Personal Information in their possession is securely held.

There are some examples where ILSC will not seek your consent for disclosure to outside third parties. These examples are:

Where there is a legal obligation to disclose Personal Information under a court or government order as for instance to detect or prevent illegal activity

Where personal information is given to our agents and service providers for services such as data processing of electronic fund transfers or loan collection

Where the disclosure is of regulated public information.

ILSC has developed and implemented detailed retention principles and will ensure the destruction of personal information in a method that prevents improper access.

ACCURACY

We try to ensure that the Personal information that we collect is as accurate, complete, and up-to-date as possible in order to properly satisfy the purposes for which it is to be used. If we are unable to verify your Personal Information or contact you, we may be limited in our ability to provide you with access to our Website and our Other Services.

OPENNESS

Upon request, ILSC will provide an explanation of its Policy with respect to the management of Personal Information. You can contact our Privacy Officer with any inquiries or complaints or if you require further information.

INDIVIDUAL ACCESS

If you would like to obtain a copy of the Personal Information held about you by us, or update, correct, or delete any Personal Information that you have provided to us through your use of the Website and/or the Other Services, or otherwise, or if you have any questions or suggestions for improving this Policy, please contact us. If you have questions about unsubscribing from email or other communications do so by using the email below in the Contact Us section. We may only deny access to your Personal Information when such denial is: (1) required or authorized by law; (2) when granting you access would have an unreasonable impact on other people's privacy, unless the requested information is severable from the Personal Information of other people; and (3) to protect our confidential commercial information. If we deny your request for access to, or refuse a request to correct information, we shall explain why.

CONSENT TO COLLECTION OF PERSONAL INFORMATION

Subject to certain legal and contractual restrictions and reasonable notice, you may refuse or withdraw consent to the collection, use or disclosure of Personal Information at any time by contacting our Privacy Officer. In addition, you may also opt out of certain communications we may send you regarding other products and services.

If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with some products, services or information which may be of value to you.

CHALLENGING COMPLIANCE

Any individual may address a written challenge concerning our compliance with this Policy to our Privacy Officer at the contact information found at the end of this Policy.

ILSC will investigate all written complaints. Should we find that a complaint has reasonable grounds, we will take all appropriate steps to correct the information and amend the policy or practice as required, and will notify the individual about the outcome.

CHANGING OUR POLICY

From time to time, we may update or make amendments to the Policy to comply with any changes in legislation or to take into consideration any other issues that may arise. Should we make any changes, we will post the revised Policy on the Website and/or provide you with a link or an email notification. We encourage you to check back often and keep yourself informed about our Policy. As we continue to serve you and where changes have been made to this Policy, our continued business relationship constitutes acceptance of those changes.

ILSC's authoritative and most up-to-date policies are included on the website, and the Written Agreement. If any policy contained herein or on the website conflicts with the policies contained in the student's Written Agreement, the student's signed Written Agreement will govern.

CONTACT US

If at any time you have any questions regarding our Policy or our access and use of Personal Information, or if you wish to withdraw your name from any of our mailing lists, do not hesitate to contact us.

ILSC welcomes any questions, comments or inquiries. You may contact our Privacy Officer regarding your specific privacy questions or concerns at: [Privacy.Officer\[@\]ilsc.com](mailto:Privacy.Officer[@]ilsc.com) and correctly. Unless required by law, we do not share this Personal Information with third party agencies.