



Active Group International Co. Ltd. Group Privacy Policy and Privacy Standard

Privacy Policy

This Privacy Policy, together with the Active Group International Co. Ltd. (AGI) [Privacy Standard](#) (together this Policy), outlines the way in which AGI collects, holds, uses and discloses personal information. It also explains how to request access to and correction of personal information we hold, how to make a privacy complaint and how AGI will deal with such complaints.

In this Policy, 'Active Group International Co. Ltd.', 'we', 'us' and 'our' means the Active Group International Co. Ltd. Other relevant terms are defined at the end of this Policy.

By using our websites and services, or otherwise providing us with your information, you consent to us collecting, holding, using and disclosing your personal information as described in this Policy. While you can deal with us anonymously or using a pseudonym if you do not provide the Personal Information that AGI has requested, AGI may not be able to provide you with our services or access to our website.

Privacy Statement

AGI recognises the need for privacy when it collects, stores uses and (from time to time) discloses personal information about its Employees, Customers, Business partners, Education providers and other individuals that it deals with in the normal course of its business.

AGI respects the privacy of individuals and recognises the need to handle information about people responsibly and confidentially in accordance with its obligations under the Relevant Legislation.

Consistent with this position, AGI aims to protect individual privacy by implementing and promoting practices that ensure compliance with this policy and its obligations under the Relevant Legislation.

- educate individuals about their rights to privacy;
- seek to ensure personal information is accurate and up to date;
- provide access for individuals to any personal information it holds about them as permitted by law;
- only use or disclose personal information for the purpose it was collected unless individual consent is obtained or it is otherwise permitted by the Relevant Legislation;
- apply a higher standard of privacy for more sensitive personal information; and ensure compliance with the Relevant Legislation, this Policy and other related documents



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This Policy is in addition to and not in derogation from the Privacy Policy of Active Group International Co. Ltd., the ultimate holding entity of Active Education & Immigration.

This Policy provides detail about how it is applied, to whom it relates, its application to what information, and the extent of its coverage.

Active Education & Immigration may amend or vary this Policy or any Related Documents from time to time in its absolute discretion by posting a revised version on its website. If you continue to access the website or use our services you will be deemed to have accepted the revised Policy or Related Documents.



Active Group International. Co. Ltd.
Group Privacy Policy and Standard

Privacy Standard

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1. Scope

This Privacy Standard forms part of the Policy and applies to:

- employees who are involved in the management of information;
- individuals and entities, including employees, job applicants, contractors, consultants, customers, education providers and business partners of the Active Group International Co. Ltd. and visitors to its websites; and
- everyone in the Active Group International Co. Ltd. and, as such, it is not limited to Bangladesh.

The types of activities and information that this Standard regulates are those set out in the Relevant Legislation.

2. Collection and handling of information

AGI may collect, store, use and hold Personal Information about:

- its employees;
- its contractors;
- its consultants;
- its customers;
- education providers;
- Business Partners;
- other people who may come into contact with AGI or one of AGI's businesses; and
- people who visit its websites.

Personal Information has the meaning given to it in the Relevant Legislation and includes information or an opinion, whether true or not, about an identified individual or an individual who is reasonably identifiable.



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The information that we collect depends on the nature of your interactions with us. We generally collect personal information from you directly (when you provide your details to us), from you indirectly (for example, through our website) and from third parties in some instances (for example, to analyse traffic on our website and for marketing purposes).

The type of Personal Information AGI may collect includes a person's name, address, contact details, academics, and interest in areas.

AGI may also collect more specific information from employees, contractors, consultants, customers, education providers, business partners and other persons who work in AGI's workplace such as their date of birth, bank account details, tax file number and taxation information, work history, emergency contact details, references, and contract-specific information.

In some cases, we may also collect Sensitive Information for effectively managing our working relationship with you including, for example, information about an employee's state of health and medical history to ensure that we meet our obligations as a good employer and comply with relevant health and safety legislation.

Sensitive Information that we collect and hold about you may be subject to additional protections and requirements under the Relevant Legislation and, where applicable, we will ensure that such information is handled in accordance with those legal requirements.

2.1 Cookies

Our websites use cookies. A cookie is a small text file placed on your computer or mobile device when you visit a website. Cookies collect information about users of the website and their visit, such as their internet protocol (IP) address, how they arrived at the website (for example, through a search engine or a link from another website) and how they navigate within the website. We use cookies to facilitate your internet sessions, offer you services according to your preferred settings, track visitor use of our websites and compile statistics about website activities.

You can set up your web browser to block cookies. You may also remove cookies stored from your computer or mobile device. However, if you do block cookies, you may not be able to use certain features and functions of our websites.

2.2 Other websites

Our websites may contain links to other websites which are not maintained by AGI. This Policy applies only to the Bangladesh of AGI, and not third-party websites.



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3. Use and disclosure of personal information

In general, AGI uses Personal Information for various business-related purposes, including to provide products or services, for marketing purposes (including market surveys, purposes of event registrations, competitions, assistances and sponsorships) and to enhance and maintain relationships and communicate with members of the public, employees, customers, educational providers and industry stakeholders.

AGI may use or disclose your Personal Information for the Primary Purpose or for other purposes which you consented to or which AGI is otherwise required or permitted under the Relevant Legislation or otherwise by law. This may include a secondary purpose that is related or directly related to the Primary Purpose, and for which you would reasonably expect us to use or disclose your personal information.

Depending on the product or service concerned, Personal Information may be disclosed to:

- entities within AGI;
- industry stakeholders;
- service providers and specialist advisers to AGI who have been contracted to provide us with administrative or other services;
- courts, tribunals and regulatory authorities as agreed or authorised by law;
- reference agencies or investigators;
- any relevant authority that is entitled by law or otherwise authorised to receive it; or
- a person authorised by an individual.

AGI requires that organisations outside AGI who, as a result of their relationship with AGI, handle or obtain Personal Information complies with the Relevant Legislation.

3.1 Disclosure overseas

We may in some circumstances also disclose your Personal Information to the following overseas recipients:

- other members of the AGI international group;
- other companies or individuals who assist us in providing services or who perform functions on our behalf;



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- anyone else to whom you authorise us (give us your consent) to disclose it; or
- anyone else where we are required or authorised by law to do so.

These overseas recipients may be located all over the world.

If you give us your consent to the disclosure of any of your Personal Information from Bangladesh to an overseas recipient located all over the world, you expressly agree (unless and until your consent is withdrawn) that:

- the recipient could be located in a country where the privacy laws may be of a lower standard than those in Bangladesh Privacy Principles;
- while we will safeguard Personal Information in accordance with this Policy, we will not be required to and may not take all reasonable steps to ensure that the overseas recipient handles your Personal Information consistently with the Bangladesh Privacy Principles;
- AGI will not be accountable for any breach by the overseas recipient of the Bangladesh Privacy Principles in their handling of your Personal Information;
- you may not be able to seek redress for such a breach under the Relevant Legislation or under the privacy laws that apply to the overseas recipient; and
- the overseas recipient could be subject to foreign laws which may compel it to disclose your Personal Information to third parties such as a foreign authority.

4. Storage of personal information

AGI collects and holds Personal Information in hard copy and electronic form. AGI will make every effort to ensure that the Personal Information it holds is protected from misuse or unauthorised access, modification or disclosure, including by the implementation and enforcement of various security measures.

AGI may destroy or permanently de-identify Personal Information as required by the Relevant Legislation and AGI will not store Personal Information for longer than necessary. Where AGI no longer requires any Personal Information that AGI holds, AGI may destroy that Personal Information or remove details that may identify individuals.



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5. Exceptions to use and disclosure in accordance with the Principles

There are certain specified exceptions to the application of the Relevant Legislation including the Bangladesh Privacy Principles and the Information Privacy Principles (or their relevant replacement).

AGI is exempt from complying with the Bangladesh Privacy Principles in certain situations, which include:

- Employee Records: AGI can use or disclose the information contained in Employee Records where it is directly related to the employment relationship. This applies to current and former employees. If AGI discloses Personal Information regarding employees to a third party, the third party will be bound by the Bangladesh Privacy Principles.
- Use in legal proceedings: where AGI has collected information for a purpose other than the Primary Purpose, it can use or disclose Personal Information where it reasonably believes that the use or disclosure is reasonably necessary for the preparation, or conduct of, proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.

Under the Information Privacy Principles AGI must not disclose Personal Information unless it believes, on reasonable grounds, that it meets at least one of the criteria stipulated in the Relevant Legislation. For example, AGI may disclose Personal Information if the disclosure is authorised by the individual concerned, necessary for the conduct of proceedings or to avoid prejudice to the maintenance of the law or the information is to be used in a form in which the individual concerned is not identified.

6. Access accuracy and complaints

Individuals may seek access to and correction of any Personal Information which AGI holds about them by contacting the Privacy Officer at agitowha@gmail.com access will be given unless one of the exceptions in the Relevant Legislation applies.

AGI will require individuals to verify their identity and specify what information they require. AGI will respond to a request within a reasonable time after the request is made. Where the request is accepted, AGI may charge a reasonable fee for providing access to the Personal Information in accordance with the Relevant Legislation.

If you believe AGI has handled your Personal Information inconsistently with this policy or its obligations under the Relevant Legislation and you wish to complain, you can do so by contacting the Privacy Officer at agitowha@gmail.com we will require you to



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verify your identity and we may need you to provide further information so that we can investigate and respond to your complaint in a reasonable time.

AGI's contact details are:

Active Group Intl. Co. Ltd.
Level 12, Suite 6
City Heart Building
67 Nayapaltan
Dhaka 1000
Web address: <https://activegroupintl.com/>

7. Definition

These definitions have the same meaning in the Related Documents.

“Disclosure” generally means the release (including the release of the control) of information to an outside body.

“Employee Record” is a record of Personal Information relating to the employment of the employee. This may include information about the employee's health, terms and conditions of employment, training, any disciplinary action taken, resignation or termination of employment personal and emergency contact details, leave records, taxation or banking details and the employee's salary or wages.

“Primary Purpose” is the dominant reason for information being collected and will generally be connected to the relationship between AGI and the person from whom the information is being collected (for example job applicant, employee, contractor, customer, education provider, business partner) as more specifically set out in section 3 of this Standard.

“Personal Information” is information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion and may include Sensitive Information.

“Relevant Legislation” includes:

Bangladesh Privacy Principles,
any other binding privacy codes of practice issued by the relevant Privacy Commissioner, and



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any replacement or variation of these and any other applicable legislation affecting Personal Information.

“Related Documents” means any relevant policy, standard or procedure that is applicable.

“Sensitive Information” is information or opinion about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, criminal record and/or health information and such information is not generally collected from members of the general public.

8. Contact Point

If you have any queries about this Standard or Related Documents, please contact the Privacy Officer, via the following link: agitowha@gmail.com