

# IDP IELTS Privacy Policy Effective Date: 01/09/2025

#### Introduction

IELTS test centres operate in more than 140 countries, across Europe, Asia, Australia and New Zealand, North America, South America, Africa and the Middle East. IELTS Australia operates and manages some of these IELTS test centres and the British Council operates and manages others, to which you may be referred.

IELTS Australia is a joint Data Controller with the other IELTS Owners (British Council, IDP Education and Cambridge Assessment English) for the purposes of conducting the IELTS Test.

You can refer to the privacy policies of the other IELTS owners by following these links:

The British Council's is found at: <u>Information security and privacy global policy statement |</u>
<u>British Council</u>

Cambridge Assessment English 's is found at: <a href="https://www.cambridgeenglish.org/footer/data-protection/">https://www.cambridgeenglish.org/footer/data-protection/</a>

The IELTS Privacy Policy and the Test Terms and Conditions provide more details on Privacy and Personal Data handling practices related to IELTS Testing. <a href="https://www.ielts.org/policy/privacy-policy">https://www.ielts.org/policy/privacy-policy</a>

If you choose to take up any third party offers from within the IELTS app, it is your responsibility to review the terms and conditions of that product/service to understand how your data will be managed.

The rest of this policy provides you with more detail of our Privacy and Personal Data handling practices for IELTS at IDP Education.

Definitions of terms referred to in this Policy can be found in the 'Glossary' at the end of this document.

#### Who We Are

IELTS Australia Pty Ltd is a subsidiary of IDP Education Limited. You can find the IDP Group privacy policy here:

https://www.idp.com/global/privacy-policy/

**Data Controller Contact Details** 

Attn: Privacy Officer IELTS Australia Level 10 697 Collins Street Docklands 3008

Victoria, Australia

**Lidp IELTS** 

Contact our Data Privacy Officer via email to: <a href="mailto:privacyofficer@idp.com">privacyofficer@idp.com</a>

We will endeavour to respond to you within a reasonable time.

## Collection of Personal Data

Collection of Personal Data by IELTS Australia allows us to:

- Administer your IELTS Online Test
- Offer IELTS Test Practice and Preparation materials;
- Protect test integrity and prevent fraud
- Improve the way in which IELTS is delivered
- Inform you of and provide you with information on the services we provide (including events and opportunities to participate in projects/programs);
- Respond to your questions and queries;
- Forward any enquiries you have to another of the IELTS Owners (British Council and Cambridge Assessment English) in accordance with your expressed preference (e.g. when you make a general enquiry about sitting an IELTS test);
- Use your information in an anonymous form, for informational, research, statistical and training purposes for the development of Cambridge Assessment English examinations and;
- Manage our internal business operations.

Please note that if you do not provide some or all of the information we request, we may be unable to provide you with a product or service.

By consenting to this Privacy Policy, you acknowledge that the purpose of our data processing is primarily for the fulfilment of our contractual obligations and compliance with legal requirements. If no other legal grounds for processing of data exists, you consent and agree to us processing your data pursuant to this Privacy Policy.

## **IELTS** Testing

If you apply to take, or have taken, an IELTS Test we will collect personal details such as name, postal and email addresses, date of birth, gender, contact details, languages, country of nationality, residency status, education qualifications, national identity card number, passport details, employment history, occupation, information required for visa application and professional memberships.

This will include copies of documents you provide to us as proof of identity – e.g. copies of your passport or national identity card, proof of citizenship or photographs of you when you apply to sit the IELTS test.

We will also hold the results achieved by you.

We may also hold Sensitive Data about you including:

- medical information (which you may provide to obtain special consideration in relation to your testing);
- biometric information for IELTS test candidates who provide a finger scan as part of the Identity Authentication Management (IAM) for the IELTS test (a copy of – your finger scan is held in the form of a Binary Large Object (BLOB);
- biometric information for IELTS test candidates who have their photo taken for inclusion on their Test Report Form (TRF), and for the identity authentication of the test candidate. We will conduct an automated comparison between the identity document you provide us at registration and the photo taken on the test day;
- racial or ethnic origin (from information on your country of origin).
- Some personal data, such as gender, may be used to ensure that staff you interact with when attending a test in person or online are assigned to test takers in accordance with local laws and practices, where applicable.

An IELTS Owner may share any relevant information from your IELTS application or test with the other IELTS Owners for purposes such as administering the IELTS test, reviewing IELTS test results for statistical and fraud detection purposes, or accommodating changes in your preference as to test centre location.

# In other dealings with Owners

We may also collect personal details such as name, postal and email addresses, contact details, languages, nationality, education qualifications, occupation, and professional memberships if you:

- Register to participate in an event organised, managed or presented by the IELTS Owners, whether in its own right, or under contract for another organisation.
- provide your contact information to receive information on the services we provide on IELTS and IELTS related product and services.

#### Images, Audio & Video

When taking the IELTS Test, we will capture images, audio, and video recordings of you. This may include your spoken responses and any background noise during tests. We do this to:

- Verify the identity of the test taker
- Collect your responses for scoring purposes
- Monitor the test to prevent cheating

This involves using sensitive personal data such as face and voice data, along with matching technology provided by our service providers. Artificial intelligence is employed to ensure that your test day photo matches the reference photograph we have on file and to detect any cheating indicators during your test.

If a flag is raised, whether automated or manual, IDP's human reviewers will examine any discrepancies in IDs or instances of potential cheating. In such cases, we may not issue a TRF and will either:

- You might get your result later than others in your group
- · Your result might be cancelled before it is released
- Your result might be cancelled after it is released if concerns are raised after the release date

You have the right to appeal your results being withheld, information on how to do this can be found here: <u>Delayed or withheld IELTS results? Here's what you should know | IDP IELTS</u> Please note in some instances we will use third parties to support facial recognition and ID services for matching when taking the IELTS test.

## IELTS Online (Remote Proctoring)

As IELTS is a high-stakes test, all IELTS Online tests are subject to proctoring to ensure test integrity and prevent malpractice. Audio and video from your testing device's webcam and microphone, as well as a recording of your computer screen, are captured throughout all parts of the test for proctoring purposes.

The use of remote proctoring is a condition of taking the IELTS test online. If you do not agree to this condition, the alternative is to attend an IELTS Test Centre.

IELTS works with a company called Inspera to provide the IELTS online platform, including remote proctoring services. You can find out more about Inspera's privacy practices on their website here: <a href="https://www.inspera.com/legal/privacy">https://www.inspera.com/legal/privacy</a>

Remote proctoring is made up of two parts:

#### Pre-test identity checking

Before the test begins, you will be asked to present an approved form of picture ID. The Greeter (a person who supervises an exam to ensure its integrity and fairness) will match the facial image on the ID with the person in front of the camera for the test session. This is to ensure that the person taking the test is the same person that registered.

#### Test session

During the test we will record audio and video from your testing device's camera and microphone and a capture of the screen of the device used for the test. You will also be asked to provide a complete view of the room before the test begins. This is to verify that there is no one else present to assist you in any way.

Your entire testing session is monitored in real time and recorded through your testing device. Audio and video of your face, voice and workspace will be captured. These recordings are held securely within the Inspera test platform in Europe for a period of sixty days, after which they will automatically be deleted. They may be retained for longer if there are legal grounds to keep them, such as for ongoing investigations.

The remote proctoring system uses Artificial Intelligence (AI) software to monitor the audio and video from your testing device for suspicious or unusual behaviour that may indicate malpractice. If the software flags any behaviour as potentially suspicious, either during or after the test, that report is reviewed by the human proctor monitoring your test session before any action is taken.

The software will flag the following behaviors for further investigation:

- unexpected noise the systems will detect unusual noises that are picked up by your microphone. This is intended particularly to detect speech that is not coming from the test taker;
- people entering or leaving the frame whenever someone enters or leaves the frame
  during the test, the software will compare the facial image of the person entering the
  frame with the facial image on the ID submitted at the start of the test. If the images do
  not match, the software will flag the behaviour. The recordings do not form part of the
  exam and do not influence your grade they are only used to prevent malpractice,
  investigate fraudulent activities and to verify the identity of the person taking the test.

#### Remote Speaking Test

For the Speaking part of the IELTS Online Test, the Zoom video conferencing platform will be used. A digital recording of the Speaking test will be made via Zoom.

This recording will be stored temporarily within Zoom and transferred to our cloud storage in Singapore where it will be split into Audio and Video components. The recording will not be retained on the device you use to take the test. The video file will be retained for 3 months and the audio file for 3 years.

For further information on how Zoom and Inspera approaches data protection, please visit the privacy sections of their website:

https://zoom.us/privacy https://www.inspera.com/legal/privacy

# Identity Verification & Facial Recognition

We use automated facial recognition technology to enhance and streamline the identity verification process prior to sitting your IELTS test. An image of you on test day will be captured and compared against your identity document to identify any inconsistencies. Where any flags are raised, a human will intervene and make any final assessments required.

Your facial features will be captured and stored securely, and the data will only be used to prevent malpractice, investigate fraudulent activities and to verify the identity of the person taking the test.

The data will be encrypted and stored in secure servers. The data will be retained for a period of 3 years from the date of your test and then securely deleted unless required for other legal purposes. Only authorized personnel will have access to your data.

#### Your Rights:

- You have the right to opt-out of using facial recognition technology and choose alternative methods for access. Please note for IELTS Online, you will need to change to an in-person test centre test to be manually verified.
- You can request access to your biometric data.

## **IELTS Test Practice & Preparation**

We provide services to support you in preparing to take the IELTS test including support tools, practice tests, seminars and IDP Masterclasses. Collection of your Personal Data allows us to:

- provide you with test practice and preparation services you request;
- develop new and improved test practice and preparation tools;
- provide you with your test practice results and give you general or personalised feedback;
- with your consent, inform you of and provide you with information on the services we provide (including events and opportunities to participate in projects/programs);
- manage our internal business operations; and respond to your questions.

## Other Dealings with IELTS Australia

Other ways you may deal with IELTS Australia include:

- registering your interest in being engaged as consultants or employees;
- submitting a research proposal;
- registering with a service offered by IELTS Australia; or
- being the representative of a Recognising Organisation (organisations that acknowledge and accept IELTS scores).

We will provide specific notice at the point your information is collected.

#### Retention

We will retain your details for as long as they are needed for the relevant purposes listed in the Purposes section. When retaining information for the purpose of administering the IELTS Online test.

- All test results and records relating to your registration and sitting of the test, including your ID document, are held for 3 years after your most recent test result
- Video of your speaking test is held for 3 months after your IELTS Online test
- Audio of your speaking test is held for 3 years after your IELTS Online test

We may also retain certain other records for other legitimate reasons (including after your relationship with the IELTS Owner(s) has ended), for example to resolve any potential disputes, to comply with other reporting and retention obligations, or for the prevention of fraud. All the personal information that we collect and generate during the test (e.g. video and voice recording, your answers to the questions or the document to prove your identity, such as your

Identity Card or your Passport) is temporarily stored on the device you take the test on and normally removed at the end of the test.

## How We Collect Personal Data

We will only collect your Personal Data by lawful and fair means. Personal Data may be collected directly from you or your authorised representative or may be collected from a third party such as a licensee or representative authorised by us to provide services to you. You may supply your Personal Information to us when communicating with us via social networks and other online channels, e.g. through your Facebook or Twitter identity.

We do not collect Personal Data and Sensitive Data unless such information is reasonably necessary for our business functions or activities. We will obtain your consent before collecting any such information.

When you deal with us, you will need to identify yourself in order for us to provide our services to you, as such we do not accept the use of pseudonyms.

If you access our websites, we may collect additional personal data about you in the form of your IP address and/or domain name.

# Legal Bases for Processing Your Personal Data

We will only process personal data where we have a lawful basis to do so. The basis for processing your personal data varies depending on the activity we collected it for. In some occurrences, we may have more than one lawful basis for processing. The information below summarises the basis on which the IELTS Australia processes personal data:

| Legal Basis  | Explanation  |
|--|--|
| Contract   | IELTS Owners process personal data which is necessary for the performance      |
|  | of a contract for your IELTS test. This includes, but not limited to, IELTS    |
|  | registration, identity checks, examination administration.                     |
|  |  |
| Legal  | IELTS Owners process personal data which is necessary to comply with legal     |
| Obligation   | obligations. This includes, but not limited to, providing personal information |
|  | to regulators, law enforcement agencies and statutory bodies.                  |
| Consent  | IELTS Owners process personal data where you have provided your consent        |
|  | to do so. For example where your personal data is used for marketing           |
|  | purposes. You may withdraw consent at any time.                                |
| Legitimate   | IELTS Owners process personal data in order to meet our legitimate interests   |
| Interest   | as a global provider of the IELTS service and exams. This includes, but is not |
|  | limited to responding to general enquiries, supporting candidates, preventing  |
|  | fraudulent activity and improving our services.                                |
| Sensitive Personal Data processing IELTS Australia will process Sensitive Data (also |  |
| referred to as Special Category Data)under the following legal bases:                |  |

| Explicit    | With your explicit consent when you provide a biometric finger scan and also   |
|-------------|--|
| Consent     | where medical information is provided to support requests for special  |
|             | arrangements to be made in relation to your IELTS testing.   |
|             | and the grant of the state of t |
|             | With your explicit consent when you provide your test day photo in order for   |
|             | us to authenticate you through our identity verification system.   |
| Equality of | To monitor equality of opportunity provision. Any such outputs from this   |
| opportunity | processing would be aggregated and not identify specific individuals.  |
| monitoring  | Sensitive Data will only be shared on a strict need to know basis in line with   |
|             | the individual IELTS partner security policy.  |

### Disclosure to Others

Information disclosed by us to overseas recipients for the purposes of providing IELTS testing services to you may be transferred offshore to the other IELTS Owners (British Council and Cambridge Assessment English). These recipients are United Kingdom based entities, subject to the Data Protection Act (UK). Where we transfer data to offshore recipients, the data is subject to use restrictions and safeguards against unauthorised access.

Some IELTS Australia IT systems and data are hosted on servers in countries outside Australia or the UK and we may send your information to one of those servers as part of our business.

IELTS Australia may hold or transfer the data we collect in or to the following countries (in addition to the country where you took the test):

- Australia
- United Kingdom
- India
- Singapore
- United States

This information is stored and accessed only as required to provide our services to you. Where we transfer data to offshore servers, the data is subject to use restrictions and safeguards against unauthorised access.

The IELTS owners use third party subcontractors to provide parts of the IELTS services as detailed below. For these services it is necessary to share your information with these subcontractors for us to provide the IELTS Online test and associated services.

Snowflake – Data warehousing, including storing, cataloguing and enabling analysis of data by IELTS. Tableau – Data visualisation and reporting tool to enable the analysis of data by IELTS.

The information disclosed to overseas recipients consists of any information you have given us to provide the relevant services. By accepting services from us, you consent to us providing your Personal Information to the relevant overseas recipient as mentioned above. IELTS Australia takes appropriate steps to ensure there are adequate safeguards in place for the

transfer of your personal information including standard protection clauses in our contracts and an IDP Group Data Transfer agreement.

The IELTS Owners may disclose the relevant information from your IELTS registration or IELTS Online test with:

- Educational institutions, IELTS test centres, governments (including visa processing authorities), or professional bodies and commercial organisations that recognise IELTS scores;
- With regulatory authorities for verification purposes, to protect the IELTS test and its stakeholders or where legally required;
- Third parties identified by you which act on your behalf to facilitate your applications to educational institutions, governments (including visa processing authorities), or professional bodies and commercial organisations that recognise IELTS scores; and
- In certain situations, share personal information to government bodies and law enforcement bodies.

Unless required by law, the disclosures listed above take place in accordance with your instructions as to which organisations you want to be able to view your IELTS information. Where we do share personal information with these types of organisations, we make sure it is protected, so far as it is reasonably possible.

We also use other organisations to process your Personal Data to carry out services on our behalf. We use them to:

- Provide customer service, surveys and marketing;
- Personalise our services;
- Process payments; and
- Carry out fraud and other legal investigations.

Where we use another organisation, we make sure that your Personal Data is protected and remains in our control.

We want to make sure that you know about the products and services of IELTS Australia and its related entities that may be relevant to you (please see our <u>IDP global policy</u> for details on the related entities). We may use the Personal Data that we collect and hold about you to market and promote our products and services that may be of interest directly to you. However, we will ensure you have the ability of opt out of such communications at any time if you wish.

# Your Rights

You have the right to seek access to any of your Personal Data held by us unless there is a valid reason under the applicable privacy legislation for us to withhold the information.

Valid reasons may include:

 We have reason to suspect that unlawful activity or misconduct of a serious nature has been engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or • Giving access would reveal evaluative information generated within us in connection with a commercially sensitive process.

If your personal details change, or you believe the information we hold about you is incorrect, incomplete, or out-of-date, please contact us so that we can correct our records.

#### The right to erasure

At your request, we will remove all the data we have for you which we are not required legally to retain.

#### The right to restrict processing

You have the right to restrict processing when you have exercised one of the above rights and it may take some time to process that request. For example: when you contact us to update your details you have the right to request restriction until your details are being updated.

#### The right to withdraw consent

For the processing activities where we have asked you for consent, you have the right to withdraw this consent at any point by unsubscribing from a message from us, or by contacting <a href="mailto:privacyofficer@idp.com">privacyofficer@idp.com</a>

#### The right to object

You can object to the processing of your Personal Data. The right to not be subject to automated decisions and profiling. None of our processing activities are purely automated and no decisions are made without human intervention. There are instances where we process data to analyse or predict behaviour, but we will ask you for explicit consent when this processing involves your Personal Data.

#### The right to data portability

If you have provided us with your Personal Data with consent or under the contact obligations, you have the right to request the data you have provided to us in a machine-readable format should you decide to move to another data controller.

#### Making a request

Requests for access or correction to your Personal Data or other privacy rights described above should be addressed to the IDP Privacy Officer by emailing <a href="mailto:privacyofficer@idp.com">privacyofficer@idp.com</a>. All requests will be responded to in writing within a reasonable period of time. As part of this process, we will verify the identity of the individual requesting the information prior to providing access or making any changes. If we cannot fulfil your request, we will respond and provide you with an explanation.

# Making a Complaint

We have procedures in place to deal with your inquiries or complaints.

If you have any questions about our policy or any complaint regarding the treatment of your privacy by us, please contact  $\frac{privacyofficer@idp.com}{privacyofficer@idp.com}$ 

If you feel we have intruded on your privacy or misused your data, you are able to complain.

In Australia

Office of the Australian Information Commissioner's (OAIC) <a href="https://www.oaic.gov.au">www.oaic.gov.au</a>

## Updates to This Policy

From time to time, we may update this privacy policy. We encourage you to take the time to review it any time you provide us with Personal Data. We aim for there to be 'no surprises' in our dealings with your Personal Data. If we make significant changes to the policy and we have your email address, we will send you an email informing you of these changes, how they may impact you, and remind you of your privacy rights.

#### Glossary

- 1. Applicable Privacy laws means: The Privacy Act 1988 (Cth) or any other applicable laws relating to privacy or the use or protection of personal data anywhere in the world
- 2. IDP refers to IDP Education Limited (ACN 117 676 463).
- 3. IELTS refers to the International English Language Testing System.
- 4. IELTS Australia refers to IELTS Australia Pty Ltd (ACN 008 664 766) which is a subsidiary of IDP.
- 5. IELTS Owners refers to the British Council, Cambridge Assessment English and IDP Education Ltd (through its subsidiary IELTS Australia Pty Ltd), who together own the IELTS test. The British Council and Cambridge Assessment English are United Kingdom based entities.
- 6. IELTS Online refers to a remote proctored IELTS test
- 7. Personal Data means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.
- 8. Privacy Act means the Privacy Act 1988 (Cth).
- 9. Sensitive Data (also referred to as Special Category Data) includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a professional or trade association or criminal record that is also personal data, or health information about an individual, or biometric information used for the purpose of automated biometric verification or identification, or biometric templates.