



Date: (MM/DD/YYYY) \_\_\_\_\_

Please complete pages 1-3 and print legibly using black or blue ink.

PREVIOUSLY ENROLLED AT GIA?  YES  NO If yes, please provide your student number \_\_\_\_\_

THE FOLLOWING INFORMATION IS REQUIRED.

### Student Information

USE YOUR FULL LEGAL NAME. THIS IS THE NAME THAT WILL APPEAR ON YOUR GIA CREDENTIAL.

\_\_\_\_\_  
Last/Surname

\_\_\_\_\_  
First Middle Suffix

\_\_\_\_\_  
U.S. Social Security Number†

\_\_\_\_\_  
Date of Birth (MM/DD/YYYY) Gender:  Male  Female

\_\_\_\_\_  
Email Address **REQUIRED FOR ALL SCHOOL CORRESPONDENCE**

\_\_\_\_\_  
Mobile Phone (country code) (phone number)

\_\_\_\_\_  
Home Phone (country code) (phone number)

\_\_\_\_\_  
Business Phone (country code) (phone number)

**Preferred phone number:**  
 Mobile  Home  Business

#### Permanent Home Address

\_\_\_\_\_  
Street Number, Street Name, Apt # or P.O. Box

\_\_\_\_\_  
City

\_\_\_\_\_  
State Postal Code Country

#### Mailing Address (if different than above)

\_\_\_\_\_  
Business Name (if applicable)

\_\_\_\_\_  
Street Number, Street Name, Apt # or P.O. Box

\_\_\_\_\_  
City

\_\_\_\_\_  
State Postal Code Country

### Residency and Visa Status

Country of Residence<sup>††</sup> \_\_\_\_\_

Are you a U.S. citizen?  Yes  No

IF NO:

Country of Citizenship \_\_\_\_\_

Country of Birth \_\_\_\_\_

Are you a U.S. permanent resident?  Yes  No

Are you currently in the U.S. on a nonimmigrant visa?  Yes  No  Not Applicable

Can you read, speak, and understand English?  Yes  No

Have you ever pled guilty to or been convicted of a felony?  Yes  No

IF YES, submit a letter of explanation and documents with your application. Your application will be reviewed by the admissions committee. Review the most current version of the GIA Education Catalog at GIA.edu for a complete list of requirements.

### GIA Non Discrimination Policy

It is GIA's policy not to engage in discrimination against, or harassment of any student enrolled in or seeking enrollment in GIA on the basis of race, color, national or ethnic origin, ancestry, religion, creed, gender, age, disability, medical condition, pregnancy or parental status, marital status, sex, sexual orientation, veteran status, gender identity, caste, union membership, political affiliation, physical appearance, HIV status, or any other classification protected by applicable federal and state nondiscrimination, equal opportunity laws, orders and regulations, and remaining compliant and consistent with the Civil Rights Act; the Americans with Disabilities Act; the Rehabilitation Act of 1973; and Title IX of the Education Amendments of 1972. This policy on non-discrimination applies to admissions, enrollment, scholarships, loan programs, employment, and access to participation in all GIA programs and activities.

### Reasonable Accommodation

GIA will make reasonable accommodations for students with qualified disabilities. Each course requires students to perform particular physical and mental ability tasks related to that course. Upon request, GIA is pleased to discuss these tasks with you to allow you to evaluate your potential for success and your decision to apply. Students who will be requesting accommodation are asked to do so in writing following admission to GIA and at least 30 days prior to the date accommodations will be needed. Documentation must be from a professional who is qualified in the testing and diagnosis of the disability. Please make an appointment to discuss your request with the Dean of Students.

† Social Security Number: Federal legislation requires that all postsecondary institutions report student Social Security Numbers (SSN's) to the Internal Revenue Service (IRS). This IRS requirement makes it necessary for us to request the SSN of every student. Students that do not have a SSN (e.g. those who are not U.S. citizens or permanent residents) are exempt from this requirement. A student may refuse to disclose his or her SSN, but the student may then be subject to fines by the IRS. Failure to disclose their SSN may also render a student ineligible for financial aid and certain tax credits. GIA has a strong commitment to ensuring the privacy and confidentiality of student records and will not disclose your SSN without your consent for any purpose except as allowed by law.

†† Residency means the country in which you normally live. If requested, you should be able to provide proof of residency in this country (for example, government issued ID, residency card, utility bill, or other proof at GIA's discretion).



NAME \_\_\_\_\_ STUDENT NUMBER \_\_\_\_\_

Last/Surname                      First                      Middle                      Suffix

### Select Your Classes

Course (GEM 275L)	Course Length	Location	Charges (U.S. Dollars)	Start Date (MM/DD/YYYY)
Advanced Laboratory-Grown Diamonds	Two-day course; 8 a.m. – 4 p.m. daily	Online	\$995	_____/_____/2021
Jewelry Forensics	Two-day course; 8 a.m. – 4 p.m. daily	Online	\$995	_____/_____/2021
Advanced Colored Stones Country of Origin	Two-day course; 8 a.m. – 4 p.m. daily	Online	\$995	_____/_____/2021
Low Temperature Heat Treatment of Corundum	One-day, Two-hour course	Online	\$195	_____/_____/2021
Photomicrography	One-day, Two-hour course	Online	\$195	_____/_____/2021

Course content, schedule and instructors are subject to change at any time.

#### REQUIRED DOCUMENTS - ALL APPLICANTS

- Completed Seminar Application
- Copy of valid government-issued photo ID or passport identifying your full name, birth date, citizenship and country of birth

### Payment

Payment is due with application and required to reserve your seat in class.

#### PAYMENT METHODS:

**Credit Card:** You can charge all fees to your VISA, MasterCard, Discover, or American Express account. For your privacy, please do not submit your credit card information with this application.

**Check or Money Order:** You can pay by cashier's check or personal check. Make checks payable to GIA. Payment must be in U.S. dollars and drawn on a U.S. bank.

**Wire Transfer:** Call toll free +1 800 421 7250 ext 4001 or +1 760 603 4001, or for details email admissions@gia.edu. All wire fees must be paid by the applicant.

- CHECK ENCLOSED PAYABLE TO GIA FOR ABOVE TOTAL
- PAYMENT TO FOLLOW VIA WIRE TRANSFER
- CREDIT CARD (GIA will contact you when your application is processed. GIA accepts VISA, MasterCard, American Express, and Discover.)
- OTHER FUNDING (Scholarship, VA Benefits, Federal Aid, etc. Do not include any payment.

**GIA WILL CONTACT YOU WHEN YOUR APPLICATION IS PROCESSED.) REGISTRATION WILL NOT BE COMPLETE UNTIL PAYMENT HAS BEEN RECEIVED.**

We reserve the right to reject an application with full refund of monies paid. If cancellation date for a seminar class is within 2 business days of the seminar start date OR after the seminar has begun then GIA retains 100% of the tuition and fees. This applies to all seminars registered through the Carlsbad campus.

### How to Submit Your Application

There are no application deadlines and students are enrolled on a first come first served basis. Class sizes are limited, so please apply early. If a class reaches capacity, you will be placed on a wait list and notified if a seat becomes available. Your registration is not confirmed until you have submitted payment and received official written confirmation from GIA.

To apply, submit this application and registration form by email to admissions@gia.edu or by mail:

Gemological Institute of America, Inc.  
 The Robert Mouawad Campus  
 Mailstop #3  
 5345 Armada Drive  
 Carlsbad, CA 92008 USA

#### THIRD-PARTY PAYER INFORMATION

Is someone other than yourself paying any part of your tuition and fees?

Yes  No

**IF YES,** please provide the payer's full name and country of residence

Full Name of Payer (Individual) or Full Legal Business Name (Business)

Country of Residence

### Applicant Signature – Required

I have read and understand all requirements for admission to GIA and hereby certify the information given in this application is correct and complete to the best of my knowledge. I understand that falsification of the application and/or supporting documents will be grounds for immediate refusal of my application and/or dismissal from GIA. I understand the registration process is not complete until I have submitted payment and received written confirmation from GIA.

**REGISTRATION WILL NOT BE COMPLETE UNTIL PAYMENT HAS BEEN RECEIVED.**

Signature of Applicant

Date

Printed Name

#### Applicants Under 18 Years of Age\*

If you are under 18 years old, the law requires the signature of your parent or legal guardian as guarantor. By signing this application, the parent or legal guardian approves of your enrollment and agrees to accept all obligations in case of default. More information for applicants under 18 years of age is available in the most current version of the GIA Education Catalog at GIA.edu

**Applicants must be at least 18 years of age prior to the class orientation date.**

Name of Guarantor

Relationship of Guarantor

Signature of Guarantor

Address of Guarantor

City

State

Postal Code

Country



# Student Privacy Notice

Last Updated (December 1, 2020)

## Introduction

GIA values the privacy of your personal data. This Student Privacy Notice ("Notice") describes GIA's policies and practices regarding our processing, including collection, use, and handling, of your personal data in connection with your relationship with GIA as an educational services applicant, student, or alumni.

If you use GIA websites other than as an educational services applicant, student, or alumni, your use of those other GIA websites and any information that you submit to us through those other GIA websites will be governed by the posted GIA website privacy notice.

## Privacy Office and Data Controller

If you have any questions or concerns about this Notice or our use of your personal data, please contact GIA's [Privacy Office](#) at:

Privacy Office  
Gemological Institute of America, Inc.  
The Robert Mouawad Campus  
5345 Armada Drive  
Carlsbad, California 92008 USA  
[privacy@gia.edu](mailto:privacy@gia.edu)

The entity which serves as your educational institution is a data controller for your personal data. For a complete list of data controllers, visit [GIA.secure.force.com/agreements/affiliatedEntities](https://gia.secure.force.com/agreements/affiliatedEntities)

## Interpretation and Translation

This Notice has been created, drafted, and prepared in the English language. Subsequently, the English versions have been translated into different languages for convenience. In case of any discrepancy, unless otherwise prohibited by law, the English language version of this Notice shall take precedence over any translation of this Notice into any other language.

## Personal Data Collection, Use and Processing

In connection with your relationship with GIA, GIA collects personal data about you (whether online, in-person, or through other means) from the following sources: directly from you; from our affiliated entities, including our subsidiaries and branch offices; from service providers; from alumni chapters; and automatically as you visit GIA websites.

We use your personal data for the purposes described in further detail below, including to facilitate your experience with GIA and to provide you with educational services and related products. We share your personal data with our GIA affiliated entities and others as described in this Notice.

Providing your personal data is voluntary. Please note, however, that without your personal data, we may be unable to provide you with the educational services and related products you request.

## Types of Personal Data We Collect

In connection with your relationship with us, GIA collects the following categories of personal data, as permitted by applicable law:

- **General contact information** (title, first name, last name, home address, mailing address, phone number(s), email address, date of birth, residency)
- **Business information** (business name, doing business as ("DBA"), address, phone number(s), business email address, website address, principals, and company officers) (note, business information is only considered personal data to the extent it identifies an individual, unless otherwise stipulated by applicable laws)
- **Government identifiers** (driver's license, passport, government-issued identification with photograph, tax identification number, business license number, business license document, GSTIN number with code (India only), voter registration card, permanent resident alien card, national identity card, vehicle license plate number (as applicable)) (note, business information is only considered personal data to the extent it identifies an individual, unless otherwise stipulated by applicable laws)
- **Financial information** (billing information, payment information, bank account number, banking institution, payment card information, third party payer information, financial and veteran information as needed to determine eligibility for student financial aid)
- **Application information** (date of birth, residency and visa status, race and ethnicity (U.S. citizens and U.S. permanent residents only), criminal history (as applicable))
- **Education/Training** (details about your enrollment such as fields of study, dates of enrollment, degrees, diplomas, certificates awarded, dates conferred, academic honors and awards received)
- **Images and recordings** (call recording, electronic video and audio monitoring and surveillance, film, photographs)
- **Verification/background check services** (We collect personal data from background check providers to verify your identity and credibility as well as creditworthiness)
- **Other information** (emergency contact information, special accommodations, additional information for identity verification)

## Purposes for Which We Use Personal Data

GIA may use your personal data for the following purposes:

- Assist with quality assurance, training, respond to inquiries and provide customer service
- Review and process an application
- Provide you with educational courses, programs and related services
- To deliver publications and subscriptions
- Combine your personal data with other information that we obtain from third parties
- Assist us in advertising our services, including on non-GIA websites or through other channels
- Ensure compliance with applicable laws including sharing your data with law enforcement and service providers
- Monitor compliance with our existing policies and procedures
- Investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, or violations of our Terms of Use, or this Notice, where we believe it is appropriate
- Respond to formal or informal government or regulatory body requests
- Ensure the integrity and security of GIA's premises and processes
- Help us understand your needs and interests
- Better understand and improve our products and services
- Direct marketing, for example, as permitted by applicable law, to send you news and newsletters, special offers and promotions, or to contact you about products or information we think may interest you in accordance with our opt in /opt out practices. We may send these communications through postal mail, electronic mail, SMS (available in some markets only) or other available channels
- Help us to determine what advertisements to direct to you, to place on websites and where to advertise our services
- Deliver GIA Alumni Association information, products and services

## As applicable based on your interaction with us, we use and share your personal data as follows:

### Admissions

Purpose: For recruitment and to review admissions applications.

The personal data that is collected during the admissions process may be shared with GIA affiliated entities, and with legal or regulatory officials to ensure compliance with applicable laws and regulations and for the purpose of academic evaluation, planning, financial aid processing and student billing, scholarship awarding, support visa processing, and enrollment reporting / verification.



## Student Privacy Notice (cont.)

**Purpose:** Know Your Student and Due Diligence Screening Policy and Notice

To the extent permitted by law, the personal data that is collected during the admissions process will be used to conduct due diligence screenings and assessments on all prospective and current students and is performed by GIA's ethics and compliance department. This is to ensure that GIA provides educational services to individuals who engage in ethical practices, are not sanctioned individuals, and who comply with all applicable laws and regulations.

The due diligence screenings and assessments may include any of the following searches, as allowable by local law and regulation:

- Screenings for government sanctions, exclusions and other watch lists;
- United States sex offender registry;
- Civil and criminal court records; and
- Other background information obtained from any law enforcement agency, administrator, government agency, court, information service bureau, including, but not limited to, criminal history.

For more information, please view our Know Your Student and Due Diligence Screening Policy and Notice [here](#).

### Office of the Dean

**Purpose:** To provide the support of academic activities and records of current and former students on behalf of GIA.

The personal data that the office of the dean collects may be shared with relevant GIA departments (e.g., academic departments, advising, admissions, financial aid, etc.), and other third parties as required by law or regulation.

### Student Financial Services

**Purpose:** To provide financial aid and administration of your account.

The personal data that student financial services collects is used to process payments, refunds, credits and may be shared with non-affiliated collection agencies

Admissions for the administration of scholarships and to complete admission criteria

United States Department of Education for monitoring awarding and determining the eligibility of federal financial aid programs

### Career Services

**Purpose:** To provide students and alumni with online access to employers, job postings, events, resources and to maintain efficient appointment and event registration, and to comply with federal or state reporting requirements.

### GIA Alumni Association

**Purpose:** To deliver the GIA Alumni Association information, products and services you request and connect you with your global alumni network.

When you have successfully completed a GIA on campus program or GIA Distance Education course you automatically become a member of the GIA Alumni Association. You will also receive GIA alumni-related communications, ePublications, and be connected with your global alumni network. Local GIA alumni chapters may be operated by third parties who have their own privacy policies, for which GIA is not responsible. In certain cases, you may be asked to consent to receiving alumni-related marketing communications, which you can freely withdraw.

Administration of scholarships and awards through alumni and donor relationships

### Security

**Purpose:** To ensure the security and integrity of GIA premises and for the safety of our employees, clients, students, visitors and others; and for emergency security purposes.

### Video and Audio Monitoring

**Purpose:** To ensure the integrity and security of GIA's premises and processes.

GIA uses both video and audio monitoring in public and work spaces. Appropriate signs are displayed in all areas where video and audio monitoring are used.

### Call Recording

**Purpose:** For quality assurance, training, responding to inquiries and providing customer service.

GIA may record inbound and outbound calls. A recorded or recited notice advises callers of call recording and by continuing the call, the caller consents to being recorded, as permitted by applicable law. Types of information we collect include without limitation: your name/s and other personal data you provide during the phone call.

### Persons Under the Age of Majority

You represent, acknowledge, and agree that you are at least 16 years of age. If you are not yet 16 years of age, you may not submit information to GIA with respect to GIA's educational services. Applicants to any GIA course or program in the United States must be at least 16 years of age. Applicants to GIA courses or programs in all other countries must be at least 18 years of age.

### Automatically Collected Data

GIA controlled student websites ("GIA Student Sites") collect certain information automatically and store it in log files. The information includes internet protocol ("IP") addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about your use of GIA Student Sites. We use this information to help us design our services to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer GIA Student Sites, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

### Information About Our Use of Cookies

GIA Student Sites use cookies to distinguish you from other users of these sites. This helps us provide you with a good experience when you visit GIA Student Sites and also allows us to improve these sites. Our Cookie Policy at [Cookie Policy](#) provides you with information about the cookies and similar technologies we use, and our purpose for using them.

### Information About Our Use of Other Technologies (Web beacons, pixel tags and other technologies)

**Clear GIFs:** Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. Clear GIFs are small pieces of code embedded invisibly on web pages, not stored on your hard drive, which often work in conjunction with cookies. We may use clear GIFs in connection with GIA Student Sites to, among other things, track the activities of users, help us manage content and compile statistics about use of these sites. We and our service providers also use web beacons in HTML emails to you help us track email response rates, measure the success of our marketing campaigns, identify when our emails are viewed and track whether our emails are forwarded.

**Analytics:** We work with service providers (including Google Analytics and Flurry) who conduct analytics to help us track and understand how visitors use GIA Student Sites. If you prefer not to participate in Flurry, please follow the instructions provided at [flurry.com](#). Google Analytics is a web analytics service provided by Google that uses cookies to help us analyze how users use GIA Student Sites. The information generated by the cookies about your use of the services will be transmitted to and stored by Google on servers in the United States. If you access the GIA Student Sites through different devices, Google may associate your devices with one another. Google has developed the Google Analytics opt-out browser add-on for the Google Analytics JavaScript (ga.js, analytics.js, dc.js). You can prevent Google's collection and use of the data it collects as defined in its policy by downloading and installing this browser plug-in: [tools.google.com/dlpage/gaoptout?hl=en-GB](#). For more information about Google Analytics cookies, please see Google's help pages ([support.google.com/analytics/answer/6004245](#)) and privacy policy ([www.google.com/intl/en/policies/privacy/](#)).

**Do-Not-Track:** Currently, our systems do not recognize browser "do-not-track" requests. You may however disable certain tracking as discussed in our [Cookie Policy](#).



## Student Privacy Notice (cont.)

### Opting In and Out of Email and SMS Marketing Communications

In certain cases, when we obtain your contact information, we may send you marketing communications via direct mail, email or SMS (available in select markets only) or other available channels about GIA's various products, services, newsletters or general updates of GIA and GIA affiliated entities. If you no longer wish to receive marketing and promotional communications from us, you may opt out by emailing our Privacy Office or as follows: for email: click the "unsubscribe" option; for SMS: text STOP in response to the text message. If you opt out of receiving marketing communications from us, please note that we will continue to communicate with you regarding your ongoing relationship with us and for customer service related purposes.

### Retention of Personal Data

As a general matter, we do not retain personal data for longer than is required or appropriate for the purposes for which it was collected, unless a longer or shorter period is necessary for our legal obligations, or customs of the industry, or to defend a legal claim, or to comply with legal, accounting, regulatory or reporting requirements, and consistent with applicable law.

### Security of Personal Data

We take reasonable steps to protect your personal data by using technical, physical and organizational measures that are designed to protect against unauthorized or unlawful use, alteration, unauthorized access or disclosure, accidental or wrongful destruction, and loss.

We take steps to limit access to your personal data to those persons who need to have access to it for one of the purposes listed in this Notice.

### Disclosure, Transfer and Storage of Personal Data

We share and jointly use your personal data (please see "Types of Personal Data We Collect" regarding the types of personal data we jointly use) with other GIA affiliated entities for the following purposes: to assist us in performing the services that you have requested; for billing and collections; to host your data; to assist us in our marketing efforts; to assist us in performing our legal compliance obligations; to protect our rights and property and the rights and property of others; and for any other purpose as set forth in this Notice and permitted by applicable law. The data controller will be responsible for your personal data jointly used with other GIA affiliated entities. We will rely on agreements based on the standard contractual clauses or another legally valid mechanism to validly transfer your personal data outside the European Economic Area.

To the extent permitted by law, we share your personal data with local GIA alumni chapters which may be operated by third parties.

We also share your personal data with non-affiliated vendors and suppliers that provide products and services to GIA or its affiliated entities (e.g., payment processing, transmission of marketing emails, web hosting, couriers). These entities do not use your information for their own purposes, including marketing purposes, but rather act on the instructions of GIA. As an example of our sharing with third party service providers, we may disclose certain information (such as your email address) with non-affiliated parties such as Facebook (more information on Facebook Custom Audience [here](#) or see above) so that we can better target ads and content to you, and others with similar interests on these non-affiliated parties' platforms or networks ("Custom Audiences"). We may also work with ad networks and marketing platforms that enable us and other participants to target ads to Custom Audiences submitted by us and others. To opt out of being included in our Custom Audiences going forward, email us at [privacy@gia.edu](mailto:privacy@gia.edu)

We may also disclose your personal data to another entity in connection with, including during negotiations of, an acquisition or merger, sale or transfer of a business unit or assets, bankruptcy proceeding, or as part of any other similar business transfer. We may also disclose your personal data when we believe it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of this Notice. GIA may also make personal data available to other parties such as legal and regulatory authorities and law enforcement upon their request and/or where we believe appropriate to do so. When transferring personal data to GIA affiliated entities and non-affiliated entities (which may be located outside the country in which your personal data was collected and may not guarantee the same level of protection) we

have executed legally necessary contracts with the recipients of your data.

**Updates to this Notice:** GIA may amend this Notice from time to time as laws change; and as our organization, products and services change. The revisions will take effect on the publication date of the amended Notice, as stated, and supersede all previous Notices regarding our privacy practices.

Unless prohibited by applicable law, we reserve the right to amend the Notice at any time, for any reason, without notice to you, other than the posting of the amended Notice at this site.

### Notification of Rights Under the Family Educational Rights and Privacy Act ("FERPA")

The Family Educational Rights and Privacy Act ("FERPA") affords eligible students ("student," or "you") certain rights with respect to their education records. (An "eligible student" under FERPA is a student who is 18 years of age or older or who attends a postsecondary institution at any age). GIA's FERPA policy can be found [GIA.edu/ferpa](http://GIA.edu/ferpa)

### RIGHTS OF CALIFORNIA RESIDENTS

Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information regarding the types of personal information the business shares with third parties for direct marketing purposes by such third party, and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To see a copy of the information disclosure provided by GIA pursuant to Section 1798.83 of the California Civil Code, please contact GIA using one of the methods described in this Notice.

### Additional Information for Residents of the European Union ("EU"), or where applicable and required by the laws of your jurisdiction

To the extent the GDPR or other law granting particular rights to data subjects applies to you, you have the following rights with regard to our processing of your personal data:

- **Right to access, correct and delete your personal data:** GIA will use reasonable measures designed to ensure that all personal data is correct. You also have a responsibility to ensure that changes in personal circumstances (for example, change of address, bank account, etc.) are notified to GIA so that we can ensure that your personal data is up-to-date.  
You have the right to request access to any of your personal data that GIA may hold and to request correction of any inaccurate personal data relating to you. You furthermore have the right to request deletion of personal data we hold about you.
- **Right to withdraw consent:** In the event your personal data is processed on the basis of your consent, you have the right to withdraw consent at any time by sending an email to [Privacy Office](#) specifying your request, without affecting the lawfulness of processing based on consent before its withdrawal.
- **Data portability:** To the extent that we use your personal data on the basis of consent or for the performance of a contract and that personal data is processed by automatic means, you have the right to receive all such personal data that you have provided to GIA in a structured, commonly used and machine-readable format, and also to require us to transmit it to another data controller where this is technically feasible.
- **Right to restrict personal data use:** You have the right to restrict our use of your personal data where (i) you contest the accuracy of the personal data; (ii) the use is unlawful but you do not want us to erase the personal data; (iii) we no longer need the personal data for the relevant purposes, but you require it for the establishment, exercise or defense of legal claims; or (iv) you have objected to our personal data use justified on our legitimate interests pending verification as to whether GIA has indeed compelling interests to continue the relevant personal data use.
- **Right to object to processing justified on legitimate interest grounds:** To the extent that we are relying upon legitimate interest to process data, then you have the right to object to such processing, and we must stop such processing unless we can either demonstrate compelling legitimate grounds for the processing that



### Student Privacy Notice (cont.)

override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defense of legal claims. Normally, where we rely upon legitimate interest as a basis for processing, we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

- **Lodge a complaint:** You also have the right to lodge a complaint with a supervisory authority, in particular in your country of residence, if you consider that the collection and use of your personal data violates this Notice or applicable law.

#### Legal Bases We Rely on When Processing Your Personal Data

Where EU data protection law applies, and where applicable under other applicable data protection laws, we process your personal data under the following legal bases:

- **Our Contract With You.** Our processing is necessary to perform our obligations under a contract with you or to perform steps requested by you prior to entering into a contract with you (e.g., to verify the information you have provided to us).
- **Our Legitimate Interests.** Our processing is necessary for our legitimate interests, including to protect the security of our services; to protect the health and safety of you or others; to establish, protect and defend our legal rights and interests; to prevent fraud and verify identity and authorization of clients; to understand and analyze usage trends; and to improve our products and services.
- **Legal Compliance.** Where our processing is required to comply with applicable law (for example, to maintain your payment transaction history for tax reporting purposes): e.g., in response to subpoenas, court orders and other lawful requests by regulators, courts and law enforcement agencies, or related to national security requests.
- **Your Consent.** When we have your express consent as defined by applicable law.

#### Privacy Questions and Complaints

Please note that certain personal data may be exempt from the requests described above pursuant to applicable laws, and that certain rights may only be exercisable in certain jurisdictions, in accordance with applicable laws. If you have any questions or concerns about this Notice or our use of your personal data, please contact GIA's [Privacy Office](#), at any time. In your local jurisdiction, you may also have the right to lodge a complaint with a supervisory authority if you consider that our processing of your personal data violates applicable law.

#### Student Acknowledgment

- I agree to GIA's [Student Privacy Notice](#). I consent to GIA's processing of my personal data and to the transfer of information about me outside my home country as described in the Notice. I understand that subsequent withdrawal of my consent may prevent GIA from providing certain products or services to me.
- I have received GIA's [Know Your Student and Due Diligence Screening Policy and Notice](#) and by submitting my personal data to GIA for consideration, I agree that GIA may undertake any of the referenced searches.

\_\_\_\_\_  
Signature of Applicant

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date (MM/DD/YYYY)