

STUDENT APPLICANT PRIVACY POLICY

1. Introduction

The American University of Malta and Sadeen Education Investments Limited ("we"/"us"/"our"/"AUM") are committed to preserving your privacy. This page explains what information we collect about you, as an applicant and prospective student of AUM during and as part of the admissions process, how we use it and the way we protect it.

Our use of your personal data is subject to your instructions, the EU General Data Protection Regulation ("GDPR"), other relevant Maltese and EU legislation and our professional duty of confidentiality.

For the purposes of the GDPR, the Data Controller is:

Sadeen Education Investment Limited
Gateway Building, Dock No. 1
Triq Dom Mintoff
Bormla, BML 1013
Malta

+356 2169 6970

Email: info@aum.edu.mt

2. Contact us

If you wish to request any clarification or additional information in relation to this privacy policy, or you may wish to exercise any of your rights in relation to your personal data, please send us an email on privacy@aum.edu.mt.

This privacy policy is effective as of the 25th May 2018 the event that we modify this privacy policy, we will post a clear notice of this update in the homepage of our website.

3. Key terms

Data Controller	The person that determines the purposes and means of the processing of personal data.
Personal data	Any information relating to an identified or identifiable natural person.
Processing	Any operation which is performed on personal data such as collection, storage, use and erasure.
Sensitive Personal Data	Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic and biometric data and data concerning health, sex life or sexual orientation.

4. Personal Data that we collect, may process and what we may use it for

Most of the personal data we collect and process about you as part of the admissions process is given to us by you directly. This includes all personal information that you provide us when you express an interest in studying at AUM, either when you communicate with us by phone, email or in person during meetings, when you submit enrolment forms and supporting documentation via our website or the AUM Admissions Service and any other information and documentation you submit to us during the admissions process. We may also collect information on your behalf where we conduct screening checks for safeguarding purposes.

The table below sets out the types of personal data that we may process, what we may use it for and our legal bases, that is our reasons, for processing:

Activity	Personal data we may process	What we may use your personal data for	Our legal bases
Submitting the Enrolment Form	<p>All the details that you provide to us in the enrolment forms together with all the supporting documents and any additional details which we may record during a, face to face or online, meeting or interview process.</p> <p>These include your name and contact information, photo, information relating to your education and employment, information relating to your personal circumstances, the latter would be relevant when processing a scholarship application.</p> <p>Sensitive Personal Data which may include information relating to your racial or ethnic origin, health and any medical conditions and any criminal records.</p>	<p>To identify you and verify the information you provided.</p> <p>To process your application.</p> <p>Assessing your eligibility for scholarships.</p> <p>To determine whether to offer you a place for the course you applied for and communicating that outcome to you.</p> <p>To manage student accommodation.</p> <p>Administrative purposes such as carrying out statistical analysis, prevent or detect crime, promoting our services and dealing with complaints.</p>	<p>For our legitimate interests:</p> <p>Getting to know you as a potential student of AUM.</p> <p>Performance of contract</p> <p>Taking the necessary steps at your request before entering into a contractual relationship with you.</p> <p>Performance of a legal obligation</p> <p>To administer visa applications and comply with our legal and regulatory obligations.</p> <p>Consent</p> <p>On the basis of the consent that you have provided us, where this is required.</p> <p>You are consenting us to process your personal data upon the submission of your</p>

			personal data in the context of your application, which would include conducting necessary checks to satisfy our legitimate interests.
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5. Who do we share your data with

We will share your personal data internally with our admissions staff and other appropriate staff at AUM. We do not share your data with third parties, except with the following persons and in the indicated circumstances:

- i. **service providers** - we may disclose your personal data to third party service providers that provide us with services. These include cloud storage providers, website hosting providers consultants and our legal service providers.
- ii. **other third parties** - where necessary and as required, e.g. Malta Central Visa Unit and Identity Malta to assist you with your visa and immigration requirements in Malta.
- iii. **our group entities** - where this is required.
- iv. **our bank** - where this is required as part of the admissions process.

We may also disclose your personal data in response to any requests made from law enforcement agencies, government entities or public authorities, to comply with court orders, to obtain legal remedies and/or limit our damages, to protect your rights as well as our rights and the rights of our employees and where we deem necessary or appropriate under applicable laws and regulations.

We may also share your personal data with other parties in the event of a corporate reorganisation and/or disposition of our business, such as potential buyers of all or part of our business.

6. Where your personal data is held

We hold your personal data at our offices and those of our third-party service providers as described in clause 3 above. Some of these service providers may be located outside the European Economic Area (EEA). Any such transfers will be processed in accordance with specific EU and Maltese data protection laws as also provided in clause 5 below.

7. Transfers of your personal data outside the EEA

Transfers of personal data outside the EEA are subject to specific EU and Maltese data protection laws.

We may share your personal data outside the EEA for the purposes of processing your application to become enrolled as a student of AUM. This may occur where we share data with staff who work with us but may be operating outside the EEA or with our suppliers or agents who may be based outside the EEA.

8. Personal Data retention period

If you are successful we will retain your personal data which will form part of your student record and we will continue to process it in terms of our Student Privacy Policy. If you are unsuccessful, we

will still retain your personal data. We will need to keep your personal data after your association with us has come to an end in order to comply with our record-keeping requirements in terms of the law and to be able to respond to any questions, complaints or claims made by you or on your behalf.

We will not collect more data than we require or retain your data for longer than necessary to fulfil the purposes outlined in this policy.

9. Your rights with respect to your Personal Data

You have the following rights if you reside in the EU:

Right of Access

The right to access and be provided with a copy of your personal data.

Right to Rectification

The right to require us to correct any inaccurate personal data about you.

Right to be forgotten

The right to require us to delete your personal data in certain circumstances.

Right to restriction of processing

The right to require us to restrict processing your personal data in certain circumstances.

Right to data portability

The right to receive your personal data which you provided to us, in a structured, commonly used and machine-readable format and the right to transmit that data to another data controller in certain circumstances.

Right to object

The right to object to the processing of your personal data in certain circumstances, which includes processing for direct marketing purposes and continued processing of your data carried out for the purpose of our legitimate interests.

Right not to be subject to automated processing

The right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects concerning you or significantly affects you.

Should you require any further information on each of the above rights or would like to exercise any of them, please contact us on privacy@aum.edu.mt.

10. Protecting your personal data

We have implemented security measures to protect your personal data that we collect from being used or accessed unlawfully or accidentally lost. We only grant access to your personal data to those persons who have a genuine need to access it. Those processing your personal data are subject to the duty of confidentiality.

11. Complaints

We would like to resolve any concern that you may have about the processing of your personal data directly with you. However, you have the right to lodge a complaint with a supervisory authority, in the EU state in which you work, reside or where the alleged infringement of data protection laws took place. The supervisory authority in Malta is the Office of the Information and Data Protection Commissioner which may be contacted at <https://idpc.org.mt/en/Pages/contact/complaints.aspx>.

Last updated – 20 November 2018