

WEBSITE PRIVACY POLICY

1. Introduction

The American University of Malta and Sadeen Education Investments Limited ("we"/"us"/"our") are committed to preserving your privacy. This page explains what information we collect about you when using our website, how we use it, and the way we protect it. Other privacy notices are available in relation to our use of personal data of applicants and students as well as our use of personal data of our staff.

Our use of your personal data is subject to your instructions, the Data Protection Act (CAP 586 of the Laws of Malta), the EU General Data Protection Regulation ("GDPR"), other relevant Maltese and EU legislation.

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. In 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 when using our website is given to us by you directly. This includes all personal information that you submit on any of the online forms on our website.

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 Contact Us Form	Contact details that you provide to us in the contact form via our website, these include your name and email address.	<p>Responding to your communications with us, such as any questions, comments, complaints or requests.</p> <p>Updating and enhancing our contacts database</p>	<p>For our legitimate interests:</p> <p>Getting to know the relative contact person who could include a potential student/employee</p> <p>Managing business communications</p> <p>Responding to your communications with us</p>
Signing up for email updates	Your email address	To provide you with all of our latest news and activities or enable your attendance at an event.	<p>For our legitimate interests:</p> <p>Develop our network of contacts.</p> <p>Share relevant content and promote our activities and the opportunities we offer with our students, employees or third parties who have previously expressed an interest in AUM.</p> <p>Consent</p> <p>On the basis of the consent that you have provided us, where this is required.</p>
Submitting the Online Student Enrolment Form	All the details that you provide to us, via our website, in the student enrolment form, together with supporting documentation which includes	<p>To process your application</p> <p>To identify you and verify the information</p>	<p>For our legitimate interests:</p> <p>Getting to know the relative potential</p>

<p>For further information please see our Privacy Policy for Applicants.</p>	<p>both personal data and sensitive personal data.</p>	<p>you provided</p> <p>To determine whether to offer you a place for the course you applied for and communicating that outcome to you.</p>	<p>student.</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 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>Use of our website</p>	<p>We may automatically collect technical information, including your Internet Protocol (IP) Address, browser type, operating system and other information about your visits.</p>	<p>To be able to trace the computer used in cases of any kind of misuse of our website.</p> <p>To improve our website.</p> <p>To be able to report aggregate information to third parties.</p>	<p>For our legitimate interests:</p> <p>To ensure the security of our website</p> <p>To improve our website.</p>

5. Use of cookies

We use cookies to optimise the functionality of our website. A cookie is a small file that contains certain data such as the site's name and unique user ID and is downloaded to and stored on your device when you visit a website. Cookies are generally used to make websites work more efficiently and enable website owners to gather information about the use of their website. Thus, they may be used for different purposes such as website analytics, targeted advertising, counting visitors, and monitoring their behaviour.

We use cookies to enable us to remember the personal settings of our users when visiting our website. These cookies may obtain information about you, your device, and your use of our website.

Most, but not all, of the cookies we use are automatically deleted from your computer when you leave our website or shortly afterwards.

For information about how we use cookies on our websites, please see our Cookie Policy.

6. Personal Data from Minors

Our website is directed solely to adults. Please do not provide us with any of your personal data if you are under the age of sixteen.

7. Who do we share your data with

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, accountants, tax advisors, and legal service providers.
- ii. **other third parties** - where necessary to carry out your instructions.
- iii. **our group entities** - where this is required to provide you with a service.

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.

8. 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 5 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 7 below.

9. Transfers of your personal data outside the European Economic Area (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 the provision of our services to you. 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.

10. Personal Data retention period

We will retain your personal data even after your association with us has come to an end. 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.

11. 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 include 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.

12. 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.

13. 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