



TYPE: Policy	
SUBJECT: Data Protection Policy	REFERENCE: LWP15
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LAST REVIEWED:	
APPROVED BY: Board of Directors	
<p>Learning Works is part of the Vassallo Group.</p> <p>This privacy policy will explain how Learning Works uses the personal data of all students, employees, and other third parties who work, offer service or study at the educational institution.</p> <p>We collect the information from you when you use our website and when you visit our Learning Works Building in Level 2 Suite, The Landmark, 5 Triq I-Iljun, Qormi.</p> <p>This Policy includes:</p> <ol style="list-style-type: none">1. What data do we collect?2. How do we collect your data?3. How will we use your data?4. How do we store your data?5. Who has Access for the data?6. Marketing	

7. What are your data protection rights?
8. What are cookies?
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1. What data do we collect?

Learning Works collects specific data according to the nature of the individual stance which includes all or part of the following data:

Students

- Personal identification information (Name, email address, phone number, etc.)
- Personal bust photo for identification
- Next of kin information (Name, email address, phone number, etc.)
- Bank Account details (To facilitate payments).
- Special Category Data (This will include any health conditions that we need to know to ensure safety and religion or belief to safeguard inclusion)

Employees

- Personal identification information (Name, email address, phone number, etc.)
- Next of kin information (Name, email address, phone number, etc.)
- Police Conduct.
- Personal bust photo for identification
- Pre-Employment medical assessment.
- Employees attendance and sick leave.
- Bank Account details (For Direct Credit purposes).
- Various internal standardised reports.

2. How do we collect your data?

You directly provide our Company with most of the data we collect. We collect data and process data when you:

Students

- Register online or communicate with us regarding our services on social media platforms.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser's cookies.
- Contact us using telephony, requesting information about Learning Works Courses
- Start studying with Learning Works.

Employees

- Contact us using telephony, requesting information about Learning Works Job-related opportunities
- Offer a service to Learning Works
- Start working with Learning Works

2a Our Company may also receive your data indirectly from the following sources:

Students

- Public Administration
- Various internal standardised reports created by the Learning Works to ensure progress along your educational journey and excellent service.

Employees

- Public Administration
- Various internal standardised reports created by the Learning Works to ensure progress along your educational journey and excellent service.

3. How will we use your data?

Learning Works collects your data so that we can:

Students

- Assist you in your educational plan and studies as requested by yourself.
- Make the necessary contacts in case of an emergency through different communication channels.
- Communicate to you the results of your assignments and examinations.
- Process the bills for all services/purchases requested.
- Contact you about the requests for services offered by Learning Works.

Employees

- Contact you about the requests for services offered by the company.
- Set up the legal framework for employment.
- Issue Employment contracts.
- Transfer Direct Credits to Bank accounts.

If you agree, Our Company will share your data with our partner companies so that they may offer you their products and services.

- Vassallo Group

4. How do we store your data?

Students

Our Company securely stores the hard copy data of students studying at Learning Works within the institution.

Some data might be stored on learners encrypted computers to complete their assessments.

Excess hard copy information will be stored at the institution's administration offices

Our Institution will keep your hard copy data for the period of 10 years. Once this time period has expired, we will destroy your hard data. However, for

educational reasons Learning Works will permanently keep a softcopy of some data under the supervision of the Learning Works administration.

This is in accordance with the GDPR, since educational information is important to assist students with their life progression. Additionally, special attention is given to ensure privacy and respect, and freedom from manipulation.

Employees

Our Company securely stores the hard copy data of the Learning Works employees within the institution.

Additional information and copies of some of the information kept at institution level will be kept at the HR Department.

Excess hard copy information will be stored at the Learning Works administration department.

Soft copy of the information is also kept in the Dakar software system which is a software product that assist Human Resources to manage Payroll, Personnel, Absence Management, Recruitment, Time & Attendance, Rostering, Training Management and Performance Appraisals.

5. Who has Access for the data?

Students

Authorised employees of any span of duty are responsible for the maintenance of all records which are required to be maintained accurately and which pertain to educational progress and wellbeing while at Learning Works

These records may be inspected at any time as required by authorised administration personnel.

This is in accordance with the Data Protection Act, 2001 which regulates the processing of personal data whether held electronically or in manual form.

Employees

Authorised employees of any span of duty is responsible for the maintenance of all records which are required to be maintained accurately and which pertain to employee's journey within the company.

These records may be inspected at any time as required by authorised administration personnel.

This is in accordance with the Data Protection Act, 2001 which regulates the processing of personal data whether held electronically or in manual form.

6. Marketing

- Learning Works will be sending information and reminders to students and employees about internal events from time to time.
- Learning Works will be promoting its services and various celebrations using local newspapers and periodicals, leaflets, local news broadcast on different stations and various online social media.

You have the right at any time to object to participate in any material which Learning Works will be using to promote its services, as well as giving your data to other members of the Vassallo Group.

If you no longer wish to be contacted for marketing purposes, contact the Company's **Data Protection Officer**

7. What are your data protection rights?

Our Institution would like to make sure you are fully aware of all your data protection rights. Every user is entitled to the following:

- **The right to access**

You have the right to request Learning Works for copies of your personal data. We may charge you a small administration fee for this service.

- **The right to rectification**

You have the right to request that Learning Works correct any information you believe is inaccurate. You also have the right to request Learning Works to complete the information you believe is incomplete.

- **The right to erasure**

You have the right to request that Learning Works erase your personal data, under certain conditions taking in consideration the legal requirements.

- **The right to restrict processing**

You have the right to request that Learning Works restrict the processing of your personal data, under certain conditions taking in consideration the legal requirements.

- **The right to object to processing**

You have the right to object to Learning Works' processing of your personal data, under certain conditions taking in consideration the legal requirements.

- **The right to data portability**

You have the right to request that Learning Works transfer the data that we have collected to another organization, or directly to you, under certain conditions taking in consideration the legal requirements.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email or write directly to us on:

Email: dpo@vassallogroupmalta.com

Address: Data Protection Officer.
Vassallo Group.
The Three Arches, Valletta Road, Mosta. MST 9016

8. Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

For further information, visit allaboutcookies.org

Learning Works or any of its online portals do not store personal information at any time.

9. How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser.

However, in a few cases, some of our website features may not function as a result.

10. Privacy policies of other websites

The Vassallo Group website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

11. Changes to our privacy policy

Our Institution keeps its privacy policy under regular review and places any updates on this web page. This privacy policy is reviewed periodically or after any changes which might affect its applicability.

12. How to contact us

If you have any questions about Learning Works' privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email: dpo@vassallogroupmalta.com
Address: Data Protection Officer.
Vassallo Group.
The Three Arches, Valletta Road, Mosta. MST 9016

13. How to contact the appropriate authority

Should you wish to report a complaint or if you feel that our Institution has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

Email: idpc.info@idpc.org.mt
Address: Office of the Information and Data Protection Commissioner
Floor 2, Airways House, Triq Il-Kbira, Tas-Sliema. SLM 1549
Telephone: +356 2328 7100

Charlo Bonnici
CEO