



TYPE: Policy
SUBJECT: Data Protection Policy REFERENCE: LWP06
DATE: 1 <sup>st</sup> October 2020
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APPROVED BY: The Board of Directors
<p>Learning Works is part of the Vassallo Group of Companies.</p> <p>This privacy policy indicates 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>Personal information is obtained when you use our website and/or when you visit our Learning Works premises in the Mediterranean College of Sport at 50, Triq Ix- Xorrox, Birkirkara.</p> <p>This policy includes the kind of data collected, how it is collected and when we will be using it. It includes how we store the data and who has access to it. It refers to marketing use and data protection rights and explains what cookies are and how these are managed. Privacy policies of other websites as well as changes to the privacy policy of Learning Works are discussed. Information about how Learning Works can be contacted as well as how the appropriate authorities can be contacted is also given.</p> <p><b>1. What data do we collect?</b></p> <p>Learning Works collects specific data according to the role of the individual which includes all or part of the following data:</p>

## **Students**

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

## **Employees**

- Personal identification information (Name, ID number, email address and phone/mobile number, etc.)
- Next of kin information (Name, email address and phone/mobile number)
- Recent Police Conduct Certificate.
- Personal bust photo for identification
- Pre-employment medical assessment.
- Employee's attendance and sick leave.
- Bank Account details (For Direct Credit purposes).

## **2. How do we collect your data?**

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

### **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.

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. .

**Employees:**

- Public Administration
- Various internal standardised reports created by Learning Works to ensure progress during your career.
- Personal file from the mother company – Vassallo Group

Additionally, the institution records lectures, both when sessions are carried out in face-to-face teaching as well as when these are carried out online, with all participants being aware that recording is taking place.

### **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 your good selves.
- 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.

#### **4. How do we store your data?**

##### **Students:**

Our institution 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 a period of 40 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.

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

## **5. Who has Access to the data?**

### **Students:**

Authorised employees 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 are responsible for the maintenance of all records which are required to be maintained accurately and which pertain to an employee's progression 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, kindly contact the Vassallo Group's Data Protection Officer at the address indicated in clause 12 below.

## **7. What are your data protection rights?**

Our Institution would like to make sure that 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.

- **The right to rectification**

You have the right to request that Learning Works corrects any information you believe is inaccurate and to complete the information you believe is missing.

- **The right to erasure**

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

- **The right to restrict processing**

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

- **The right to data portability**

You have the right to request that Learning Works transfers the data that have been collected to another organization, or directly to your good selves, under certain conditions taking in consideration 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 at the address indicated in article 6 above:

## **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/manage-cookies](http://allaboutcookies.org/manage-cookies)  
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 to you, or you would like to exercise one of your data protections rights, please do not hesitate to contact us.

Email: [dpo@vassallogroupmalta.com](mailto: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** at:

Email: [idpc.info@idpc.org.mt](mailto: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