

Revision History

Last Date:	Revised	Last Revised By:	Last By:	Approved	Revision Description:
04/05/2018		Igor Zivojinovic			1.0
26/07/2018		Geraldine Riley			2.0

Subject:

Privacy Policy

Policy Owner: Igor Zivojinovic

CONFIDENTIAL

Effective: _____

Approved by: _____

Scope

The privacy policy explains how we use any personal information we collect about you when you use this website and our wider services.

- Glossary of Terms
- What information do we collect about you and how?
- How will we use the information about you and why?
- Transferring your information outside of Europe
- Security precautions in place about data collected
- Profiling
- Marketing
- How long will we hold your data for?
- Access to your information, correction, portability and deletion
- Other websites
- Complaints
- Changes to our Privacy Policy
- How to contact us

Glossary of Terms

What is personal data?

Personal data relates to any information about a natural person that makes you identifiable which may include (but is not limited to):

- Names and contact information i.e. emails and telephone numbers
- National Insurance Numbers
- Employment history
- Employee numbers
- Credit History
- Personal tax
- Payroll and accounting data

What is sensitive personal data?

Sensitive personal data refers to the above but includes genetic data and biometric data. For example:

- Medical conditions
- Religious or philosophical beliefs and political opinions
- Racial or ethnic origin
- Convictions
- Biometric data (e.g. photo in an electronic passport)

What is a Data Controller?

For general data protection regulation purposes, the "data controller" means the person or organisation who decides the purposes for which and the way in which any personal data is processed.

The data controller is Mellieha Holiday Centre.

The privacy officer can be contacted at privacy@mhc.com.mt.

What is a Data Processor?

A "data processor" is a person or organisation which processes personal data for the controller.

What is Data Processing?

Data processing is any operation or set of operations performed upon personal data, or sets of it, be it by automated systems or not. Examples of data processing explicitly listed in the text of the GDPR are: collection, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, disseminating or making available, aligning or combining, restricting, erasure or destruction.

What do we mean by Business to Business?

PLC, LTD, LLP incorporated partnerships, trusts and foundations, local authorities and government institutions.

What do we mean by Business to Consumer?

Private clients, sole traders, unincorporated partnerships, trusts and foundations.

What information do we collect about you and how?

MHC, as a Data Controller, is bound by the requirements of the General Data Protection Regulations (GDPR).

You agree that we are entitled to obtain, use and process the information you provide to us to enable us to discharge the Services and for other related purposes including;

- Updating and enhancing client records
- Analysis for management purposes
- Carrying out credit checks in relation to you
- Statutory returns
- Legal and regulatory compliance
- Crime prevention.

We collect information about you when you fill in any of the forms on our website ie sending an enquiry, signing up for an event, filling in a survey, giving feedback etc. Website usage information is collected using cookies.

When submitting forms on our website we use a third-party software provider for automated data collection and processing purposes, they will not use your data for any purposes and will only hold the data in line with our policy on data retention.

Cookies are text files put on your computer to collect standard internet log information and visitor behaviour information. This information is then used to track visitor use of the website and to create statistical reports on website activity. For more information visit www.aboutcookies.org or www.allaboutcookies.org.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. Please note in a few cases some of our website features may not function because of this.

Analytics – e.g. how visitors use our website

We use Google Analytics to store information about how visitors use our website so that we may make improvements and give visitors a better user experience.

Google Analytics is a third-party information storage system that records information about the pages you visit, the length of time you were on specific pages and the website in general, how you arrived at the site and what you clicked on when you were there. These cookies do not store any personal information about you eg name, address etc and we do not share the data. You can view their privacy policy below:

Google - <http://www.google.com/intl/en/policies/privacy/>

IP addresses

An IP or Internet Protocol Address is a unique numerical address assigned to a computer as it logs on to the internet. MHC do not have access to any personal identifiable information and we would never seek this information. Your IP address is logged when visiting our site, but our analytic software only uses this information to track how many visitors we have from particular regions.

How will we use the information about you and why?

At MHC we take your privacy seriously and will only use your personal information to provide the Services you have requested from us. We will only use this information subject to your instructions, data protection law and our duty of confidentiality.

For Business to Business Clients and Contacts our lawful reason for processing your personal information will be "legitimate interests". Under "legitimate interests" we can process your personal information if: we have a genuine and legitimate reason and we are not harming any of your rights and interests.

For Business to Consumer Clients and Contacts our lawful reason for processing your personal information will be "A contract with the individual" e.g. to supply goods and services you have requested, or to fulfil obligations under an employment contract. This also includes steps taken at your request before entering into a contract.

We may receive personal data from you for the purposes of our money laundering checks, such as a copy of your passport. This data will only be processed for the purposes of preventing money laundering and terrorist financing, or as otherwise permitted by law or with your express consent.

Our work for you may require us to pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing the Services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the Services and we have contracts in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

We collect information on our website to process your enquiry, deal with your event registration, give advice based on survey data and improve our services. If you agree, we will also use this information to share updates with you about our services which we believe may be of interest to you.

We will not share your information for marketing purposes with companies so that they may offer you their products and services.

Security precautions in place about data collected

When you give us personal information, we take steps to make sure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are sent normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of extra information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and cut fraud and credit risk.

How long will we hold your data for?

- **Marketing:** We will hold your data for a period of 6 years with a review every 3 years. You will have the opportunity to opt out or update or delete data at any point should you need to do so and details are set out in this policy as to how to do that.
- **Contracted Services:** We will hold your data for 7 years in line with our regulatory requirements.

Access to your information, correction, portability and deletion

What is a Subject Access Request?

This is your right to request a copy of the information that we hold about you. If you would like a copy of some or all your personal information, please email or write to us at the following address: Mellieha Holiday Centre, Ghadira Bay, Mellieha, Malta, MLH9064. We will respond to your request within one month of receipt of the request.

We want to make sure your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate by emailing privacy@mhc.com.mt or writing to the above address.

Objections to processing of personal data

It is your right to lodge an objection to the processing of your personal data if you feel the "grounds relating to your particular situation" apply. The only reasons we will be able to deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defence of a legal claims.

Data Portability

It is also your right to receive the personal data which you have given to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without delay from the current controller if:

- (a) The processing is based on consent or on a contract, and
- (b) The processing is carried out by automated means.

Your Right to be Forgotten

Should you wish for us to completely delete all information that we hold about you for:

- Email: privacy@mhc.com.mt, or
- In Writing to: Mellieha Holiday Centre, Ghadira Bay, Mellieha, Malta, MLH9064.

Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

Complaints

If you feel that your personal data has been processed in a way that does not meet the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then tell you of the progress and outcome of your complaint. The supervisory authority in Malta is the Information Commissioner's Office.

Changes to our Privacy Policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 20 May 2018 and the Version number is 1.0 in line with the new GDPR guidelines.

The date and the version number need to be noted on the front sheet

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

- By email: privacy@mhc.com.mt.
- Or write to us at Mellieha Holiday Centre, Ghadira Bay, Mellieha, Malta, MLH9064.