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## **GBS Privacy Policy**

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## Related policies

- GBS Malta Records Management and Retention Policy
- GBS Malta Equality and Diversity Policy
- GBS Malta Data Protection Policy
- GBS Malta Data Breach Policy and Procedure

## External Reference

1. The General Data Protection Regulation (EU) 2016/679 (GDPR) controls how your personal information is used by organisations, businesses, or the government.
2. The Data Protection Act (Chapter 586 of the Laws of Malta)
3. Information and Data Protection Commissioner, Accessed online at:  
<https://idpc.org.mt/disclaimer/>

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## GBS HE Malta Limited Privacy Policy

### Introduction

- 1.1. GBS HE Malta ("GBS") needs to collect, store and process personal data about its staff, students, and other individuals it has dealings with, to carry out our functions and activities. GBS is a controller for most of the personal data it processes and is committed to full compliance with the applicable data protection legislation including The Data Protection Act (Chapter 586 of the Laws of Malta) and the General Data Protection Regulation (Regulation (EU) 2016/679). This policy sets out how GBS ("we", "our", "us") handle the personal data of our staff, clients, suppliers, partners, employees, workers and other third parties.
- 1.2. GBS gathers and processes your personal information in accordance with this privacy notice. This notice provides you with information regarding your rights and our obligations, and explains how, why, and when we process your personal data. GBS is responsible for your personal data, and we have appointed a Data Protection Officer who oversees privacy related matters.

### Information that we collect

- 2.1 GBS processes personal information to meet our legal, regulatory, statutory, and contractual obligations and to provide you with information, either about our products and services or about matters of public interest. We will never collect any

unnecessary personal data from you and will not process your information in any way other than as specified in this notice without telling you first.

2.2 GBS collects information from the following:

- Visitors to our website
- Enquiries, visitors, and survey respondents.
- People who email GBS or filling in our forms
- People who call GBS
- People who contact GBS via social media
- People who respond to a GBS Survey
- Visitors to our office
- Current and former student details including when they apply for a course at GBS, enrolment information and progression through the course.
- Data received from external sources and external referees
- GBS staff, board members, contractors, volunteers, and people who apply to work with us.

2.3 You don't have to create an account or provide us with any personal information when you access the GBS website. We may ask you for some personal details if you access some of our services for example:

- To order a prospectus
- To register for an event such as an open day
- To make an enquiry

2.4 If you use one of our website forms or if you contact us by email, we may collect and process personal information about you. This may include:

- Your contact details including your address and phone number
- Your name, title, date of birth and gender
- Your email addresses
- Education or professional details
- Attendance at GBS events

2.5 We may automatically collect certain data from you as you use our website by using cookies and similar technologies.

2.6 We may receive data from third parties such as analytics providers such as Google, advertising networks, providers of technical, payment and delivery services, such as data brokers or aggregators.

2.7 If you do not provide us with data when requested to perform our contractual obligations, under the terms of the contract between us and you, we may not be able to fulfil our contract. In these circumstances we may have to cancel your service, but if we do, we will notify you at the time.

2.8 We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at [dpa@globalbanking.ac.uk](mailto:dpa@globalbanking.ac.uk). In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

### **How we use your personal data**

3.1 GBS HE Malta takes privacy seriously and will never disclose, share, or sell your data without your knowledge. We may process your personal data without your knowledge or consent where this is required or permitted by law.

3.2 We only retain your data for as long as it necessary. We will only use your data for the purposes for which we have collected for, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose.

3.3 If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

3.4 During its activities, GBS will use student data to carry out its functions and to provide services to students as part of student journey. Due to the vast number of activities GBS undertakes, it is not possible to state every instance where student data will be used, however GBS is committed to ensure student data is only processed in a manner that ensures appropriate security and use of the personal data.

### **Disclosure of your Personal Data**

4.1 We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services, marketing, and delivery services.
- Professional advisers including lawyers, bankers, auditors, and insurers.
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- We may also share your personal data with third parties if we are under a duty to disclose or share your personal data to comply with any legal obligation, to enforce or apply our site terms of use or to protect the rights, property or safety of our site, our users, and others.
- Where your data is shared with third parties, we will seek to share the minimum amount of data necessary.
- Where necessary, student personal information will be shared internally within and across other departments at GBS.
- Personal information is protected by GBS and may be shared with external parties, as required during studies.

## **Data Security**

5.1 We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business requirement to process your personal data. They will only process your personal data on our instructions, and they must keep it confidential.

5.2 We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach.

## **Data Retention**

6.1 We will retain your information for as long as necessary to provide you with the services that you have requested from us or for as long as the law otherwise permits.

## **Your rights to the information we hold about you**

7.1 Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, right to data portability (where the lawful ground of processing is consent) to withdraw consent.

7.2 You have the right to see the personal data that we keep about you, by making a request in writing to us at [dpa@globalbanking.ac.uk](mailto:dpa@globalbanking.ac.uk). We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made many requests. In this case, we will notify you.

7.4 If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Office of the Information and Data Protection Commissioner who is the national supervisory authority responsible for monitoring and enforcing the provisions of the GDPR and the Data Protection Act. This Office is also responsible to enforce the provisions of the Freedom of Information Act and ensure that public authorities observe the requirements thereof. (<https://idpc.org.mt/>). However, we should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you informally.

### **Student Responsibilities**

8.1 Throughout the course of your studies, you have a responsibility to keep your personal details up to date. You can update your details by sending the email to your Student Success Tutors or the Admissions teams.

8.2 During your time as a student, you may have access to other individuals' personal data, and you are legally obliged to handle this in a confidential, professional, and responsible manner in line with data protection legislation and any other codes of conduct.

8.3 If you are made aware of an individual's personal information, then you are expected to keep this confidential and to not tell anyone without the individual's prior consent (unless there is an exceptional circumstance). You should also not seek to actively obtain another individual's personal information to which you are not entitled. In the instance where data protection legislation or a duty of confidence has been breached, disciplinary action will be considered.

### **Use of Technology Platform**

9.1 The website uses Google Analytics technology which may collect non-personally identifiable information relating to your use of the site. This may include:

- Which pages you see

- How long you stay

- What you click on our pages
- If you visit the website again
- Which country and city you are browsing from

9.2 This data is collected for monitoring and understanding the effectiveness of our websites. We also collect data relating to the demographics and interests of our users via Google Analytics and cookies set by Google advertising networks. This data is used in aggregated form to help improve the site and GBS marketing efforts. For further information on Google safeguards for personal data see: <https://policies.google.com/privacy>.

## **Cookies**

10.1 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. For more information about how to reject cookies using your internet browser settings please consult the “Help” section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## **Third-party Links**

11.1 This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **Consent**

12.1 By using our site, you consent to GBS HE Malta website privacy policy.

## **Data Protection and Confidentiality**

13.1 GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the General Data Protection Regulations and under the Data Protection Act.



## **How to Complain**

14.1 GBS only processes your personal information in compliance with this privacy policy and in accordance with the relevant data protection laws. If you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the Information and Data Protection Commissioner (IDPC). In the first instance, complaints should be directed to GBS Data Protection Officer at [dpa@globalbanking.ac.uk](mailto:dpa@globalbanking.ac.uk).

14.3 By submitting a complaint, students are agreeing that GBS can process, use, and share information it contains to enable the complaint to be considered. Information may be disclosed to any person who has a need to see it for the complaint to be fully investigated. Information may also be shared with relevant people after a complaint to facilitate actions and recommendations after investigation.

14.4 All documentation relating to complaints will be kept confidential and shall be disclosed only to those persons who have a right to the information by virtue of their role in the complaints process, or as required by law.

## **Monitoring and Review**

15.1 This policy may be amended by GBS at any time. GBS will regularly test our systems and processes to monitor compliance. Any issues related to the monitoring and review of this policy, please contact [asqo@globalbanking.ac.uk](mailto:asqo@globalbanking.ac.uk).

## **Alternative Format**

16.1 This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact:

- **Name:** Welfare Management Team
- **Position:** Student Services Officer
- **Email:** [welfare@globalbanking.ac.uk](mailto:welfare@globalbanking.ac.uk)