

STAFF AND JOB APPLICANTS PRIVACY POLICY

1. Introduction

The American University of Malta and Sadeen Education Investment Limited ("we"/"us"/"our"/"AUM") are committed to preserving your privacy. This page explains what information we collect about you (i) while you apply to work at AUM, (ii) while you are an employee at AUM, or (iii) as a former employee at AUM, as well as how we use it and the way we protect it.

Our use of your personal data is subject to your instructions, the EU General Data Protection Regulation ("GDPR"), other relevant Maltese and EU legislation and our professional duty of confidentiality.

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 clarifications or additional information in relation to this privacy policy, or 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 May 25, 2018. In the event that we modify this privacy policy, we will post a clear notice indicating as much on the homepage of our website, and you will be notified via email or a notification via intranet.

3. Key terms

Data Controller	The person who 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, 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 is given to us by you directly during the application process. This includes all personal information that you have provided us with when you submitted your application form and supporting documentation, and any other information and documentation you submitted to us. We may also collect information on your behalf, in which case we would conduct screening checks for safeguarding purposes.

The table below sets out the types of personal data that we may process, what we may use it for, and our legal bases (our reasons) for processing:

Activity	Personal data we may process	What we may use your personal data for	Our legal bases
Your job application to work at AUM	<p>All the details that you provide us with in the job application form and curriculum vitae together with all the supporting documents and any additional details provided by your references, which we may record during a face-to-face or online meeting or interview process.</p> <p>These details include your name and contact information, photo, information relating to your education, qualifications, and employment, as well as information relating to your personal circumstances.</p> <p>Sensitive Personal Data, which may include information relating to your racial or ethnic origin, health and medical conditions, and any criminal records.</p>	<p>To identify you and verify the information you provided.</p> <p>To process your application.</p> <p>To determine your suitability for the job you applied for, whether to offer you said job, and how to communicate the offer to you.</p> <p>Other purposes, such as carrying out statistical analysis, preventing or detecting crime, promoting our services, and dealing with complaints.</p>	<p>For our legitimate interests:</p> <p>Getting to know you as a potential employee of AUM.</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 administer visa applications and comply with our legal and regulatory obligations.</p> <p>Consent</p> <p>On the basis of the consent that you have provided us with, where this is required.</p> <p>You consent that we process your personal data upon the submission of said data in the context of your</p>

			application, which would include our conducting necessary checks to satisfy our legitimate interests.
Becoming an employee of AUM	<p>All the details listed above which you provided us with throughout the application and recruitment process.</p> <p>Administrative and financial records about your employment at AUM.</p> <p>Other information relating to your use of the facilities we offer, such as library facilities.</p> <p>Other information or documentation which we may collect about you and which is in the public domain.</p>	<p>To identify and assess your suitability for a determined role.</p> <p>To administer your financial package and other employment matters.</p> <p>Maintaining staff records.</p> <p>To provide you with certain services and facilities and to monitor your use of these services and facilities, such as library and IT facilities.</p> <p>To communicate with you by any effective means, including email, phone, and post.</p> <p>To enable us to contact others in case of an emergency. We assume that you have informed these contact persons indicated by yourself that you will be giving us their details.</p> <p>Other purposes, such as carrying out statistical analysis, preventing or detecting crime, promoting our services, and dealing with complaints.</p>	<p>Performance of contract</p> <p>To administer your payroll and other employment matters relating to your employment at AUM, such as administration of annual leave and sick leave, performance, misconduct and disciplinary actions.</p> <p>Performance of a legal obligation</p> <p>Compliance with relevant laws, including employment, social security and tax laws.</p> <p>Compliance with visa requirements</p> <p>Compliance with our legal and regulatory obligations.</p> <p>For our legitimate interests:</p> <p>For security purposes, including CCTV surveillance.</p> <p>To provide you with certain IT facilities.</p> <p>For quality assurance purposes.</p> <p>Consent</p>

			<p>On the basis of the consent that you have provided us with, where this is required.</p> <p>You consent that we process your personal data upon the submission of said data in the context of your application, which would include our conducting necessary checks to satisfy our legitimate interests.</p>
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5. With whom do we share your data?

We will share your personal data on a need-to-know basis with the relevant staff at AUM. We do not share your data with third parties, except with the following persons and in the circumstances indicated:

- i. **service providers** - we may disclose your personal data to third party service providers. These include cloud storage providers, website hosting providers, consultants, payroll services providers, and our legal service providers.
- ii. **other third parties** - where necessary and as required. These include Government Departments and Agencies such as the National Commission for Further and Higher Education, as well as the Malta Central Visa Unit and Identity Malta to assist you with your visa and immigration requirements in Malta.
- iii. **our group entities** - where this is required.

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 reorganization and/or disposition of our business, such as potential buyers of all or part of our business.

6. 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 3 above. Some of these service providers may be located outside the European Economic Area (EEA). Any such transfers will be processed in accordance with the relevant EU and Maltese data protection laws.

7. Transferring your personal data outside the EEA

The transfer of personal data outside the EEA is subject to specific EU and Maltese data protection laws.

We may share your personal data outside the European Economic Area (EEA) for the purposes of processing your job application to become an employee of AUM. This may consist of sharing your data with staff who work with us but may be operating outside the EEA, or with suppliers or agents who may be based outside the EEA.

8. Personal Data retention period

We retain your personal data, which will form part of our staff records, for the duration of your employment at AUM as well as after the termination of your employment at AUM. 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 fulfill the purposes outlined in this policy.

9. 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 the personal data you provided us with 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

10. 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.

11. Complaints

We would like to resolve any concerns 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 - November 20, 2018