

## AUM STUDENT 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 as a student of AUM, how we use it, and the way we protect it.

Our use of your personal data is subject to our Student Privacy Policy, your instructions, the European Union (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](mailto:info@aum.edu.mt)

### 2. Contact us

If you wish to request any clarification or additional information in relation to this privacy policy, or to exercise any of your rights in relation to your personal data, please send us an email on [privacy@aum.edu.mt](mailto: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.

### 3. Key terms

<b>Data Controller</b>	The person who determines the purposes and means of the processing of personal data.
<b>Personal data</b>	Any information relating to an identified or identifiable natural person.
<b>Processing</b>	Any operation which is performed on personal data, including collection, storage, use, and erasure.
<b>Sensitive Personal Data</b>	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 as a student is given to us by you directly during the admissions process. This includes all personal information that you have provided

us with when you submitted your enrollment form and supporting documentation, and any other information and documentation you submitted to us during the admissions process. We also maintain a record of your studies at AUM. 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 registration as a student at AUM	<p>All the details that you provide us with in the enrollment forms together with all the supporting documents and any additional details which we may record during a face-to-face or online meeting or interview process.</p> <p>These include your name and contact information, photo, information relating to your education and employment, information relating to your personal circumstances (this last would be relevant when processing a scholarship application).</p> <p>Sensitive Personal Data which may include information relating to your racial or ethnic origin, health, medical conditions, and criminal records.</p> <p>A record of your studies. This includes information about the exams you have taken, assessments you submitted, and your results.</p> <p>A record of the facilities and services that you make use of at AUM.</p>	<p>Your registration as a student at AUM.</p> <p>To deliver and administer your education. This relates to all academic matters while you are a student at AUM, and includes the provision of our teaching services to you, as set out in our student agreement.</p> <p>Assessing your eligibility for scholarships.</p> <p>To deal with any queries you may have.</p> <p>To meet our compliance and regulatory obligations, such as compliance with anti-money laundering regulations.</p> <p>To prevent or detect crime.</p> <p>Visa monitoring.</p> <p>To carry out teaching and research.</p> <p>To evaluate the performance of AUM and to improve the</p>	<p><b>Performance of contract</b></p> <p>It is necessary for the performance of a contract with you.</p> <p><b>Performance of a legal obligation</b></p> <p>To comply with our legal and regulatory obligations.</p> <p><b>For our legitimate interests, and for the performance of tasks we carry out in the public interest</b></p> <p>For administrative purposes, and to improve the overall management of the university.</p> <p><b>Consent</b></p> <p>On the basis of the consent that you have provided us, where this is required.</p> <p>You consent that we process your personal data upon the submission of said data</p>

		<p>overall management of the university.</p> <p>To carry out statistical analysis.</p> <p>To promote our services.</p> <p>When we require legal advice or any other advice relating to our rights and obligations.</p> <p>To recover money you owe us.</p> <p>To safeguard your security and collectively our security at AUM, including through CCTV surveillance.</p> <p>To operate any governance, audit, and quality assurance processes.</p> <p>To deal with complaints and take any disciplinary actions as may be required.</p>	<p>in the context of your student contract with us.</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 our Registrar staff, Student Services staff, Faculty, and others at AUM, for the purpose of maintaining educational services. 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 student information system provider, cloud storage providers, website hosting providers, consultants, and our legal service providers.
- ii. **other third parties** - where necessary and as required, e.g. National Commission for Further and Higher Education (NCFHE/Commission), as well as 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 European Economic Area (EEA)

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

Your personal data may be accessed outside the EEA via our student information system by faculty and/or staff, who may be operating outside the EEA in order to maintain educational services.

## 8. Personal Data retention period

Your personal data is part of student records and processed in terms of our **Student Privacy Policy**.

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](mailto:privacy@aum.edu.mt).

### **10. Protecting your personal data**

We have implemented security measures to protect 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*