



Saint Martin's Institute of Higher Education is committed to protect the visitors' privacy whilst viewing and gathering information from the www.stmartins.edu and associated/linked web pages in accordance with the provisions of the **General Data Protection Regulation** and all other applicable privacy and data protection legislation. The Institute's underlying Privacy Policy highlights what data is collected and the reason for use of this data by the Institute's employees.

Access Information

Saint Martin's Institute of Higher Education web servers automatically log each visit received. This data contains some information about the individual browsing the web page. These include the following;

- The internet address of the computer that is being used;
- The type of browser and operating system presently used;
- The internet address of the web site from which access is being achieved;
- The connection information such as the page or service being requesting;
- The date and time of the request.

This information is used solely for statistical purposes and demographic information relating to the Institute's web sites, and enables the Institute's employees to determine general visitor patterns and common pathways followed by visitors. Such data is found useful to redesign the webpage to accommodate future visitors and ascertain that the page provides a positive user experience in meeting the information needs of the visitor.

Personal Information

Submission Forms & Surveys

Saint Martin's Institute of Higher Education may, from time to time, collect personal information supplied through web-based forms and surveys. At no time will the Institute collect such personal data without alerting the visitor of the collection and its purpose wherever this is not readily apparent. No data is passed onto third parties, and will only be used for subsequent communications, as indicated to the visitor at the time of submission. In submitting the visitor is agreeing that Institute's staff may use your details for the sole purpose of conducting the business of the Institute.

Cookies

An HTTP cookie, commonly known as a cookie, is a small piece of data that is stored on the visitor's computing device by the web browser whilst browsing the Institute's website. These are designed to remember the browsing activity on the Institute's website including clicking the particular buttons and recording which pages are visited. Cookies may also remember pieces of information that a visitor will have keyed into a form, such as name and surname, addresses and contact numbers. The information is in a form that is understood solely by the web site that initially set the cookie. It is the visitor's prerogative to change the setting on the browser to stop such cookie exchange.

Email

If you contact Saint Martin's Institute of Higher Education by email, we keep a record of that correspondence for the purpose of conducting our processes. We do not add any email addresses of those who communicate with the Institute through email to any mailing databases, nor do we pass this to any third party.

Contact Numbers

Saint Martin's Institute of Higher Education may collect contact numbers through the use of web-based forms and surveys. In submitting the contact number/s online, the visitor is that employees may use details for conducting the processes the Institute, and specifically for the purpose referred to on the web-based form or survey where the contact number/s are submitted.

The contact numbers will not be supplied to any third party, save in the circumstances where the Institute uses a service provider in order to supply alert service, in which event such third party shall be duly bound to keep such numbers confidential and use them only for the purpose of providing such service.

While the Institute communicates through alerts and messages that are sent to contact numbers, the main content of these alerts and messages shall consist of matters related to the Institute's processes.

Payment Card Details

Saint Martin's Institute of Higher Education does not process card numbers, expiry dates and CVVs that are submitted to effect payments other than for processing of payment for services rendered. Furthermore, card numbers, expiry dates and CVVs are not being stored by Saint Martin's Institute of Higher Education but are encrypted and transmitted directly to the payment gateway.

Changes to the Privacy Policy

Saint Martin's Institute of Higher Education reserves the right to modify this Privacy Policy at any time. Visitors are invited to consult this Privacy Policy from time to time in order to become aware of any changes. The date when this Policy was last updated is indicated at the end of this Policy.

Direct your queries about the Privacy Policy statement to the **registrar@stmartins.edu**.

Data Protection Officer

The duty of protecting data and its use at Saint Martin's Institute of Higher Education is the responsibility of the Registrar. Queries and concerns relating to the Institute's processing of personal data, should be addressed to the **registrar@stmartins.edu**.

Last Update: 4th February, 2021



**saint
martin's**
institute of
higher education

DATA PROTECTION POLICY

The General Data Protection Regulation (EU) 2016/679 (GDPR) and the Data Protection Act (Cap 586) regulate the processing of personal data whether held electronically or in manual form. Saint Martin's Institute of Higher Education is set to fully comply with the Data Protection Principles as set out in such data protection legislation.

PURPOSES FOR COLLECTING DATA

Saint Martin's Institute of Higher Education (hereinafter referred to as the Institute) collects and processes information to carry out its obligations in accordance with present legislation. All data is collected and processed in accordance with Chapter 586, the Data Protection Legislation of Malta.

RECIPIENTS OF DATA

Personal information is accessed by employees who are assigned to carry out administrative functions at the Institute. Personal Data will be made available to third parties only as authorised by law, and/or through written consent of the student and/or his legal representative.

YOUR RIGHTS

You are entitled to know, free of charge, what type of information the Institute holds and processes about you and why, who has access to it, how it is held and kept up to date, for how long it is kept, and what the Institute is doing to comply with data protection legislation. The GDPR establishes a formal procedure for dealing with data subject access requests. All data subjects have the right to access any personal information kept about them by the Institute, either on computer or in manual files. Requests for access to personal information by data subjects are to be made in writing and sent to the Registrar of the Institute. Your identification details such as identity card number, name and surname have to be submitted with the request for access. In case we encounter identification difficulties, you may be required to present an identification document. The Institute aims to comply as quickly as possible with requests for access to personal information and will ensure that it is provided within a reasonable timeframe and in any case not later than one month from receipt of request, unless there is good reason for delay. When a request for access cannot be met within a reasonable time, the reason will be explained in writing to the data subject making the request. Should there be any data breaches, the data subject will be informed accordingly. All data subjects have the right to request that their information is amended, erased or not used in the event the data results to be incorrect. In case you are not satisfied with the outcome of your access request, you may refer a complaint to the Information and Data Protection Commissioner, whose contact details are provided below.

ACCESSIBILITY

The Institute offers you access to all your records via the SMI Intranet system, where you are able to access and view the static data we have, with the possibility of updating personal detail fields such as email address, personal telephone number and home address. In addition to this, you are also able to access your attendance records and financial statements.

Data concerning your attainment in the respective study units is freely available to you every academic year on SMI Moodle. SMI Moodle also includes the corrected scripts for the semester examinations, together with feedback prepared by the respective academics. The final examination grades are then published on SMI Intranet.

RETENTION POLICY

Your personal data is collected based upon the needs for the Institute to perform its activity as a seat of higher learning, based upon its license 196 according to Chapter 607 Further and Higher Education Act of the 1st January 2021, of the Republic of Malta.

The following schedule outlines the retention requirements for the various categories of documentation within the LEGAL AID MALTA AGENCY.

Category of Document	Retention Period	Justification
Diploma Supplement	Indefinite	Students may require verified copies of their attainment in the qualification they followed through their student period at the Institute, throughout their lifetime. An additional fee applies in this case.
Assessment Attainment (not recorded on Diploma Supplement), Attendance Records, General Commentary	Minimum 5 years for possible inspection during the audit carried out by the Malta Further and Higher Education Authority (MFHEA)	Once the student graduates from the programme, such operational information is superfluous except in case of an appeal by the student, or inspection by auditors from the appraisal authority.

Data that needs to be destroyed after the noted timeframes will be disposed of in an efficient manner ensuring that such information is no longer available within the Institute's precincts and on servers that the Institute has control over.

DATA PROTECTION OFFICER & DATA OWNER

The Registrar

Saint Martin's Institute of Higher Education

New Building, 116, Joe Sciberras Street, Hamrun HMR 1557

Telephone: 2123 5451

Email: registrar@stmartins.edu

Saint Martin's Institute of Higher Education

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