

GDPR Privacy Policy and Information Management

IFS Malta

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1. Definitions

Aggregated data - Data combined from multiple individuals so that it shows overall trends or statistics rather than information about a specific person.

Anonymised data - Data that has been permanently altered so that individuals can no longer be identified, directly or indirectly.

Consent - the express permission by an individual to the Institute to process his/her personal data for a specific purpose.

Data Controller - the entity that determines the purposes, conditions, and means of the processing of personal data.

Data Processor - the entity that processes data on behalf of the Data Controller.

Data Protection Officer – The Data Protection Officer (DPO) is the designated officer appointed by the Institute in terms of the GDPR and is responsible for carrying out the duties required of the role as set out by the GDPR and by any other applicable laws, rules, or regulations including also in terms of this Policy.

Data Processing Agreement (DPA) - A legally binding agreement between a data controller and a data processor that sets out how personal data will be processed, protected, and managed in compliance with GDPR requirements.

Data Subject – Any natural person whose personal data is being collected, held and / or processed including but not limited to shareholders, staff, consultants, contractors, agents, and authorised users who have a direct connection with the Institute.

GDPR - the General Data Protection Regulation is a legal framework that sets guidelines for the collection and processing of personal information of individuals within the European Union (Regulation (EU) 2016/679).

Identified or Identifiable person - is a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, and location data.

Institute – IFS Malta

Personal Data - any information relating to an identified or identifiable natural person ("data subject").

Policy - This Data Protection Policy.

Special Categories of Data - special categories of data are sensitive personal data relating to areas such as health, biometric data, racial or ethnic origin, political opinions, religious beliefs, trade union membership, and a person's sex life or sexual orientation, which require enhanced protection and specific legal grounds for processing.

2. Information Management

This policy applies to programmes which lead to qualifications awarded by the Institute. Programmes offered by other awarding bodies through IFS Malta are subject to the policies of the respective awarding body, which are available online.

IFS Malta maintains an information management system to collect, analyse and use relevant information for the effective management of its programmes and to support the achievement of institutional objectives. All personal data is processed in accordance with the GDPR and applicable Maltese data protection legislation.

Reliable and up-to-date information is essential for informed decision-making, effective programme delivery, and the continuous improvement of academic provision. Information gathered also supports the Institute's internal quality assurance processes and compliance with the requirements of the Malta Further and Higher Education Authority (MFHEA).

The information collected may include, but is not limited to:

- Member details
- Student personal data
- Student profiles (past and present)
- Student progression, completion and success rates
- Student satisfaction levels and complaints
- Tutor profiles and qualifications
- Learning resources and student support systems
- Graduate career paths and professional development

Data used for institutional monitoring and reporting purposes may be Aggregated or Anonymised where appropriate.

The Institute ensures that personal data collected is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

3. GDPR Privacy Policy

This Privacy Notice explains how the Institute, acting as the Data Controller, collects, uses, stores and protects personal data.

IFS Malta applies the accountability principle under GDPR and maintains appropriate records, procedures, and controls to demonstrate compliance with applicable data protection obligations.

If you are a visitor to the Institute website (<https://ifsmalta.org>), a student, a member, or a participant in our courses or events, this notice explains how your personal data may be processed.

i. Personal Data Collected

Personal data may be collected from:

- students
- prospective students
- members
- lecturers and trainers
- event participants
- website visitors
- suppliers and contractors where applicable

IFS Malta may collect the following personal data when you register for a course, event, or other activity:

- First name and surname
- Identification number or passport number
- Telephone number
- Email address
- Postal address
- Organisation / employer
- Job title or professional position
- Membership details of professional bodies
- Financial information required to process course registration payments

Additional information relevant to academic administration may also be collected where necessary.

IFS Malta does not normally process special category personal data as defined under Article 9 of the GDPR unless required for legitimate educational, accessibility, legal, or health and safety purposes. Where such data is processed, appropriate safeguards and additional protections shall be implemented in accordance with applicable law.

ii. Purpose and Legal Basis for Processing

Personal data is collected and processed for the following purposes:

- Processing course registrations and payments
- Providing certificates of attendance or qualifications
- Administering academic programmes and student records
- Internal record keeping and programme management
- Communication regarding lectures, seminars, courses, conferences, and other activities organised by IFS Malta

- Quality assurance, programme monitoring and institutional reporting
- Compliance with regulatory and accreditation requirements
- Processing of personal data is carried out under one or more of the following legal bases under GDPR:
- Contractual necessity – to deliver courses and services requested by participants
- Legal obligations – including reporting requirements to regulatory bodies or professional organisations
- Legitimate interests – related to the effective administration and improvement of programmes
- Consent – for marketing communications or mailing lists where applicable

Where events are organised jointly with third parties, limited personal information may be shared with those partners solely for the purpose of administering the event. In such cases, DPAs are established to ensure compliance with applicable data protection laws.

Statistical information regarding participation in courses or events may be shared with relevant bodies; however, personal data will not be disclosed in identifiable form for such purposes.

Reasonable steps are taken to ensure that personal data is accurate, complete, and kept up to date.

iii. Use of the Institute Website

Certain information may be collected automatically when users visit the IFS Malta website.

Cookies and Website Analytics

The website uses cookies and analytical tools such as Google Analytics and Hotjar to collect information including:

- Internet Protocol (IP) address
- Browser type
- Operating system
- Geographic region
- Website usage patterns

This information helps IFS Malta:

- improve website functionality
- analyse trends and visitor behaviour
- enhance user experience

Cookies are small text files placed on a user's device to collect standard internet log information and visitor behaviour data.

Users may configure their browser settings to refuse cookies. However, some website features may not function properly if cookies are disabled.

Non-essential cookies and analytics technologies are deployed only following user consent through the website's cookie management mechanism, in accordance with GDPR and the ePrivacy Directive requirements.

Social Media Interfaces

The website may contain links or interfaces to social media platforms such as LinkedIn, Facebook, and X (Twitter). If users interact with these services through the website, they should review the privacy policies of the respective platforms.

Some service providers used by IFS Malta, including website analytics or cloud-based services, may process personal data outside the European Economic Area (EEA). Where international transfers occur, appropriate safeguards such as Standard Contractual Clauses (SCCs) or adequacy decisions approved by the European Commission shall be implemented.

IFS Malta does not use personal data for automated decision-making or profiling that produces legal or similarly significant effects on individuals.

iv. Access to Personal Data

Access to personal data is restricted to the Institute's authorised personnel, including employees and contracted service providers responsible for administration, IT support, and academic management.

All employees, lecturers, contractors, and third-party service providers with access to personal data are subject to confidentiality obligations and are required to process personal data only in accordance with authorised instructions and institutional policies.

Personal data may also be shared with:

- Course lecturers or trainers for educational purposes
- Professional bodies where Continuing Professional Education (CPE) hours must be recorded
- Service providers assisting in the delivery of courses or events

All such processing is conducted in accordance with confidentiality obligations and applicable data protection legislation.

Data Processor Management

Where third-party service providers process personal data on behalf of IFS Malta, appropriate Data Processing Agreements are established in accordance with Article 28 of the GDPR.

v. Data Security

The Institute implements appropriate technical and organisational measures to safeguard personal data against unauthorised access, loss, misuse, or disclosure.

Personal data is stored securely in electronic systems and/or physical records with restricted access. Data will not be shared with third parties unless authorised by the data subject, required by law, or necessary for programme administration.

In the event of a personal data breach, IFS Malta will follow the procedures established under the GDPR and notify the relevant supervisory authority where required.

Security measures may include user access controls, encryption, secure backups, anti-malware protection, audit logging, restricted physical access, and secure destruction of records where applicable.

vi. Breach Reporting Timeframe

Where required under GDPR, personal data breaches shall be reported to the competent supervisory authority within seventy-two (72) hours of becoming aware of the breach.

vii. Data Retention

IFS Malta retains personal data only for as long as necessary to fulfil the purposes for which it was collected and to comply with applicable legal, regulatory, and accreditation requirements.

Retention periods are determined based on the nature of the data, statutory obligations, and institutional needs.

In particular:

- Student academic records, including transcripts, grades, and certification data, are archived and retained by IFS Malta for a period of forty (40) years. These records are securely stored and remain readily accessible for verification of qualifications, certification purposes, and regulatory or institutional requirements.
- Financial records, including payment and invoicing documentation, are retained in accordance with applicable Maltese tax and accounting legislation.
- Administrative and operational records, including course registration information and communications, are retained for the period necessary to support programme administration and institutional quality assurance.
- Marketing and mailing list data is retained until the data subject withdraws consent or requests removal.

At the end of the applicable retention period, personal data will be securely deleted, anonymised, or archived in accordance with institutional data management procedures and applicable law.

Retention periods are governed by internal record retention schedules and are periodically reviewed to ensure compliance with legal, regulatory, operational, and academic requirements.

viii. Changes to this Privacy Notice

IFS Malta reserves the right to update this Privacy Notice from time to time. Any changes will be published on the Institute's website.

Continued use of the website or services following the publication of updates will constitute acceptance of the revised notice.

This Privacy Notice is governed by the laws of Malta.

ix. Your Rights under GDPR

Under the GDPR, individuals have the following rights regarding their personal data:

- Right of access to personal data
- Right to rectification of inaccurate data
- Right to erasure ("right to be forgotten")

- Right to restrict processing
- Right to object to processing
- Right to withdraw consent where processing is based on consent
- Right to data portability

Requests to exercise these rights will be addressed within one month, in accordance with GDPR requirements.

4. Contact and Complaints

If you have any questions regarding this Privacy Policy or wish to exercise your rights, you may contact the:

Data Protection Officer
IFS Malta
Pietà, Malta
Email: info@ifsmalta.org

If you believe your personal data has not been handled in accordance with applicable data protection laws, you have the right to lodge a complaint with the supervisory authority:

Office of the Information and Data Protection Commissioner (IDPC) Malta.

IFS Malta is licensed as a Further and Higher Education Institution by the Malta Further and Higher Education Authority (MFHEA) to deliver and award further and higher education programmes.

Licence Number: 2013-FHI-017

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