

AP VALLETTA LIMITED - MASTER PRIVACY POLICY

Last Updated on 8 October 2018

Version 1.5

INTRODUCTION

This Master Privacy Policy (“**Privacy Policy**”) relates to the website <http://www.apvalletta.eu> and/or any sub-website and/or associated domains (and/or sub-domains) of <http://www.apvalletta.eu> (hereinafter referred to as the “**Site**”) the services provided by **AP Valletta Ltd.**, the owner of the Site, (“**We**”, “**Us**”, “**Our**”, “**Ourselves**” and/or “**AP Valletta**” and/or “**AP**”) and any related software applications (‘**Apps**’), where Personal Data is processed by the same (via the Site, any of Our Apps or otherwise) relating to You. In this Master Privacy Policy, “**You**” and “**Your**” and “**User**” refer to an identified or identifiable natural person being the User of the Site and/or client (or prospective client) of any of Our services. Our full details, including contact details, can be read [below](#).

You may be reading this Privacy Policy as a User or visitor of the Site or You may have been directed here by one (or more) of Our condensed privacy policies or Our other notices (digital or otherwise).

Although this Privacy Policy provides detailed, layered information on how and why We *generally* process Personal Data (via the Site or otherwise) as well as detailed information about Your various rights, the specific and tailor-made content of such condensed policies or other notices will, in most cases, provide You with more focused and detailed information on *specific* processing operations (for example, the specific legal basis for processing certain categories of Personal Data and the specific purpose for doing so depending on the matter at hand).

Although Our goal is to always be as clear and transparent as possible, We appreciate that legal documents can sometimes be difficult to read. However, We strongly encourage You to read this Privacy Policy (which is layered for Your convenience) with care. **Please do not hold back from contacting Us for any clarification You may need.** For example, if You need clarification on a specific legal basis We are relying on to process Your Personal Data for a specific processing operation, We would be happy to provide You with any such information You may need.

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APPLICABLE LAWS

As an entity established in Malta, EU, the *main* privacy laws that are applicable to Us in so far as You are concerned, are as follows:

- The **Maltese Data Protection Act** (previously Chapter 440 and now Chapter 586 of the Laws of Malta) as well as the various subsidiary legislation issued under the same – the ‘**DPA**’;
- The **Regulation (EU) 2016/679** of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (**General Data Protection Regulation**) – the ‘**GDPR**’.

All the above referred to together as the “**Data Protection Laws**”

WHAT IS PERSONAL DATA?

“**PERSONAL DATA**” means any information that identifies You as an individual or that relates to an identifiable individual.

Whenever it is not possible or feasible for Us to make use of anonymous and/or anonymised data (in a manner that does not identify any Users of the Site or customers of Our services), We are nevertheless **committed to protecting Your privacy and the security of Your Personal Data at all times**.

We collect Personal Data in various ways both digitally via the Site (either when You choose to provide Us with certain data as well as non-digitally (for example when You fill in a physical form to benefit from one or more of Our services).

PERSONAL DATA WE COLLECT ABOUT YOU

There are various **categories of Personal Data** that We collect about You, namely:

CONTACT DETAILS:

- **Name**
- **Surname**
- **Mailing address,**
- **Telephone or mobile number**
- **Email address**

ADDITIONAL INFORMATION:

In some cases, (for example, if You are a client [or prospective client] of Our services, via the Site or otherwise) We may request additional Personal Data as a means of securely identifying You or for another similar lawful purpose (which will be explained in the table below and/or in a condensed policy/notice that may have directed You here). The additional information We may request from You to be able to provide You with Our services includes:

- **Credentials/references**

Many of the categories of Personal Data above are collected directly from You (for example, Your Contact Details). However, **WE MAY ALSO COLLECT PERSONAL DATA FROM OTHER SOURCES**, including publicly accessible databases, social media platforms and other third parties. We may also receive Personal Data about You from third parties when We need to confirm Your Contact Details. Should this be the case, We will take all measures as required by law to further inform You about the source of such Personal Data as well as the categories of Personal Data We collect and process. There are certain instances at law where We are specifically forbidden from disclosing to You such activity (for example, when carrying out due diligence for anti-money laundering purposes).

For a detailed description of the reasons why We process the categories of Personal Data above (and any other specific Personal Data We process) as well as the corresponding legal ground(s) for doing so please see the 'What We Use Your Personal Data For (Purpose of Processing)' [below](#).

For information via the Site, please see the Cookies section [below](#).

SOCIAL MEDIA

If You choose to connect one or more of Your **social media** accounts with Our Site to enable the sharing of Personal Data via social media platforms, certain categories of Personal Data relating to You from Your social media account(s) will be shared with Us.

HOW AND WHY WE COLLECT PERSONAL DATA

As a general rule, We do not collect any Personal Data, that is, information that identifies You as an individual **other than that which You choose to provide to Us** such as the data (including Contact Details) You provide when contacting Us with enquiries relating to Our services.

Unless otherwise specified and subject to various controls, as a general rule, **We only collect Personal Data (from You or elsewhere) that We:**

- **Need to be able to provide You with the services You request from Us**
- **Are legally required to collect/use and to keep for a predetermined period of time**
- **Believe to be necessary for Our legitimate business interests**

For a detailed description of the reasons why we process specific categories of personal data as well as the corresponding legal ground(s) for doing so, please see the ‘What We Use Your Personal Data For (Purpose of Processing)’ [below](#).

PERSONAL DATA RELATING TO THIRD PARTIES

By providing Us with or allowing Us to access Personal Data relating to individuals other than Yourself, You are letting Us know that You have the authority to send Us that Personal Data or the authority to permit Us to access those data in the manner described in this Privacy Policy.

WHAT WE USE YOUR PERSONAL DATA FOR (PURPOSE OF PROCESSING)

The following is description (in a clear and plain manner) of what We use Your Personal Data for and the corresponding legal ground(s) we rely on for doing so.

For more detail on what is meant by terms such as ‘**Contact Details**’ and other categories of Personal Data used in the tables below, please see the section above relating to [Personal Data We Collect About You](#).

Please note that WHERE WE RELY ON YOUR CONSENT, THIS CAN BE WITHDRAWN AT WILL (See [SPECIAL NOTE ON CONSENT](#) below).

PROSPECTIVE CLIENTS/USERS OF THE SITE/NEW CLIENTS OF OUR SERVICES:

| PURPOSE OF THE PROCESSING | CATEGORIES OF PERSONAL DATA | LEGAL BASIS FOR PROCESSING |
|--|---|---|
| Set up a record on our systems | Registration Data Contact Data Other Communication Data | Contractual necessity Legitimate interest (to ensure we have an accurate record) |
| To manage our relationship with you | Registration Data Contact Data Other Communication Data | Contractual necessity Compliance with the legal obligations |
| For the AML/CTF and due diligence purposes | Contact Data Financial Information Identification and Verification Data | Compliance with legal obligations |
| To establish and investigate any suspicious behaviour in order to protect our business from any risk and fraud | Contact Data Identification and Verification Data | Legitimate interest (detection and prevention of fraud) |

| | | |
|---|--|---|
| For tendering purposes | Contact Data Financial Information Identification and Verification Data | Contractual Necessity |
| Evaluating Your application(s)/requests You send Us to use/receive any of Our services. | Contact Details | Contractual Necessity |
| Record keeping obligations | Contact Data Financial Information Identification and Verification Data | Compliance with legal obligations Legitimate interest (to ensure we have an accurate record) |

ONGOING CLIENTS OF OUR SERVICES:

| PURPOSE OF THE PROCESSING | CATEGORIES OF PERSONAL DATA | LEGAL BASIS FOR PROCESSING |
|---|---|---|
| Maintain records on our systems | Contact Data Financial Information Other Communication Data | Contractual necessity Legitimate interest (to ensure we have an accurate record) |
| Continue to manage our relationship with you | Contact Data Financial Information Other Communication Data Transaction and Usage data | Contractual necessity Compliance with the legal obligations |
| Comply with legal and regulatory obligations | Contact Details Financial Information | Legal obligation |
| Your being able to participate in an online survey such as client feedback | Contact Details | Your consent |
| To process and manage payments transactions (where applicable) | Financial Information | Contractual necessity |
| to be able to provide You with (some or all of) Our services – especially those provided via the Site | Contact Details | Contractual Necessity |

| | | |
|---|--|--|
| to be able to provide You with marketing material that You may have requested from Us or that We may be authorized at law to provide to You | Marketing Data | Your Consent (where we need this) OR Our legitimate interests (where we don't need Your consent) |
| Record keeping obligations | Contact Data Other Communication Data | Contractual necessity Compliance with the legal obligations |

Should We need to process Your data for a new purpose in the future, which is entirely unrelated to the above, We will inform You of such processing in advance and You may exercise Your [applicable rights](#) (as explained below) in relation to such processing.

Finally, do note that without certain Personal Data relating to You, We may not be in the position to provide some or all of the services You expect from Us or even to guarantee the full functionality of Our Site.

SPECIAL NOTE ON CONSENT

For the avoidance of all doubt, We would like to point out that in those limited cases where We cannot or choose not to rely on another legal ground (for example, Our legitimate interests), We will process Your Personal Data on the basis of Your consent.

In those cases where We process on the basis of Your consent (**which We will never presume** but which We shall have obtained in a clear and manifest manner from You), **YOU HAVE THE RIGHT TO WITHDRAW YOUR CONSENT AT ANY TIME** and this, in the same manner as You shall have provided it to Us.

Should You exercise Your right to withdraw Your consent at any time (by writing to Us at the physical or email address below), We will determine whether at that stage an alternative legal basis exists for processing Your Personal Data (for example, on the basis of a legal obligation to which We are subject) where We would be legally authorised (or even obliged) to process Your Personal Data without needing Your consent and if so, notify You accordingly.

When We ask for such Personal Data, You may always decline, however should You decline to provide Us with necessary data that We require to provide requested services, We may not necessarily be able to provide You with such services (especially if consent is the only legal ground that is available to Us).

Just to clarify, **consent is not the only ground that permits Us to process Your Personal Data**. In the last preceding section above We pointed out the various grounds that We rely on when processing Your Personal Data for specific purposes.

ACCURACY OF PERSONAL DATA

All reasonable efforts are made to keep any Personal Data We may hold about You up-to-date and as accurate as possible. You can check the information that We hold about You at any time by contacting Us in the manner explained [below](#). If You find any inaccuracies, We will correct them and where required, delete them as necessary. **Please see [below](#) for a detailed list of Your legal rights in terms of any applicable data protection law.**

INTERNET COMMUNICATIONS

You will be aware that data sent via the Internet may be transmitted across international borders even where sender and receiver of information are located in the same country. We cannot be held responsible for anything done or omitted to be done by You or any third party in connection with any Personal Data prior to Our receiving it including but not limited to any transfers of Personal Data from You to Us *via* a country having a lower level of data protection than that in place in the European Union, and this, by any technological means whatsoever (for example, WhatsApp, Skype, Dropbox etc.).

Moreover, **We shall accept no responsibility or liability whatsoever for the security of Your data while in transit through the internet unless Our responsibility results explicitly from a law having effect in Malta.**

AUTHORISED DISCLOSURES

Without prejudice to anything contained in this Privacy Policy and in the interest of full transparency, We reserve the right to disclose (and otherwise process) any relevant Personal Data relating to You which We may be processing (including in certain cases relevant IP addresses) to authorised third parties in or outside the EU/EEA if such disclosures are allowed under the Data Protection Laws (whether or not You have provided Your consent) including but not limited to:

1. For the purpose of preventing, detecting or suppressing fraud (for example, if You provide false or deceptive information about Yourself or attempt to pose as someone else, We may disclose any information We may have about You in Our possession so as to assist any type of investigation into Your actions);
2. in the event of Architecture Project being involved in a merger, sale, restructure, acquisition, joint venture, assignment, transfer;
3. to protect and defend Our rights (including the right to property), safety, or those of Our affiliates, of Users of Our Site or even Your own;
4. to protect against abuse, misuse or unauthorised use of Our Site;
5. for any purpose that may be necessary for the performance of any agreement You may have entered into with Us (including the request for provision of services by third parties) or in order to take steps at Your request prior to entering into a contract;
6. to comply with any legal obligations such as may arise by way of response to any Court subpoena or order or similar official request for Personal Data; or
7. as may otherwise be specifically allowed or required by or under any applicable law (for example, under anti-money laundering legislation).

SHARING OF PERSONAL DATA WITH OTHER CATEGORIES OF RECIPIENTS

Relevant data will also be disclosed or shared as appropriate (and in all cases in line with the Data Protection Laws) to/with members and staff of Architecture Project. Personal information will only be shared by Us to provide the services You request from Us or for any other lawful reason (including [authorised disclosures](#) not requiring Your consent).

Any such authorised disclosures will be done in accordance with the Data Protection laws (for example all Our processors are contractually bound by the requirements in the said Data Protection Laws, including a strict obligation to keep any information they receive confidential and to ensure that their employees/personnel are also bound by similar obligations). The said service providers (Our processors) are also bound by a number of other obligations (in particular, Article 28 of the GDPR).

Your Personal Data will never be shared with third parties for their marketing purposes.

The third parties who We may disclose to and/or share Your Personal Data with are, at the date of this Privacy Policy, the following:

| CATEGORY OF RECIPIENT | PURPOSE OF PROCESSING |
|--------------------------|---|
| Archive Service Provider | Hosting of archive under state-of-the-art security protocols and our exclusive control |
| IT Service Providers | Maintenance and support of our IT systems/Website(s) - with restricted access and under our strict controls |
| Auditors | Compliance with our auditing obligations – with access granted only to essential personal data |
| Public Authorities | Compliance with legal obligations and only after verifications are made into necessity of disclosure. |

SECURITY MEASURES

The personal information which We may hold (and/or transfer to any affiliates/partners/subcontractors as the case may be) will be held securely in accordance with Our internal security policy and the law.

We use reasonable efforts to safeguard the confidentiality of any and/or all Personal Data that We may process relating to You and regularly review and enhance Our technical, physical and managerial procedures so as to ensure that Your Personal Data is protected from:

- unauthorised access
- improper use or disclosure
- unauthorised modification
- unlawful destruction or accidental loss.

To this end We have implemented security policies, rules and technical and organisational measures to protect the Personal Data that We may have under Our control. All our members, staff and data processors (including specific subcontractors, including cloud service providers established within the European Union), who may have access to and are associated with the processing of Personal Data, are further obliged (under contract) to respect the confidentiality of Our Users' or clients' Personal Data as well as other obligations as imposed by the Data Protection Laws.

Despite all the above, We cannot guarantee that a data transmission or a storage system can ever be 100% secure. For more information about Our security measures please contact Us in the manner described [below](#).

Authorised third parties, and external/third party service providers, with permitted access to Your information (as explained in this Privacy Policy) are specifically required to apply appropriate technical and organisational security measures that may be necessary to safeguard the Personal Data being processed from unauthorised or accidental disclosure, loss or destruction and from any unlawful forms of processing.

As stated above, the said service providers (Our data processors) are also bound by a number of other obligations in line with the Data Protection Laws (particularly, Article 28 of the GDPR).

RETENTION PERIODS

We will retain Your Personal Data only for as long as is necessary (taking into consideration the purpose for which it was originally obtained). The criteria We use to determine what is 'necessary' depends on the particular Personal Data in question and the specific relationship We have with You (including its duration).

Our normal practice is to determine whether there is/are any specific EU and/or Maltese law(s) (for example tax or corporate laws) **permitting** or even **obliging** Us to keep certain Personal Data for a certain period of time (in which case We will keep the Personal Data for the maximum period indicated by any such law). For example, any data that can be deemed to be 'accounting records' must be kept for ten (10 years).

We would also have to determine whether there are any laws and/or contractual provisions that may be invoked against Us by You and/or third parties and if so, what the prescriptive periods for such actions are (this is usually five (5) years). In the latter case, We will keep any relevant Personal Data that We may need to defend Ourselves against any claim(s), challenge(s) or other such action(s) by You and/or third parties for such time as is necessary.

Where Your Personal Data is no longer required by Us, We will either securely delete or anonymise the Personal Data in question.

PROCESSING FOR RESEARCH AND STATISTICAL REASONS

Research and statistics using User or client information is only carried out so that We may understand Our Users' and/or clients' needs, to develop and improve Our services/activities and/or for philanthropic goals representative of Architecture Project's purpose. In any case, We will always ensure to obtain any consent We may legally require from You beforehand. As in all other cases, We will also ensure to implement all appropriate safeguards as may be necessary.

LINKS TO THIRD PARTY SOURCES

Links that We provide to third-party websites are clearly marked and We are not in any way whatsoever responsible for (nor can We be deemed to endorse in any way) the content of such websites (including any applicable privacy policies or data processing operations of any kind). We suggest that You should read the privacy policies of any such third-party websites.

COOKIES

When You visit Our Site, We collect certain categories of Personal Data automatically through the use of cookies and similar technologies.

For more detailed information including what cookies are and how and why We process such data in this manner (including the difference between essential and non-essential cookies) please read Our detailed but easy-to-read Cookie Policy.

MINORS

The Site and Our services are not intended to be used by any persons under the age of eighteen (18) and therefore We will never intentionally collect any Personal Data from such persons. If You are under the age of consent, please consult and get Your parent's or legal guardian's permission to use the Site and to use Our services.

We shall consider that any Personal Data of persons under the age of eighteen (18) received by Us, shall be sent with the proper authority and that the sender can demonstrate such authority at any time, upon Our request.

YOUR RIGHTS UNDER THE DATA PROTECTION LAWS

Before addressing any request You make with Us, We may first need to verify Your identity. In all cases We will try to act on Your requests as soon as reasonably possible.

As explained in the [Retention Periods](#) section above, We may need to keep certain Personal Data for compliance with Our legal retention obligations but also to complete transactions that You requested prior to the change or deletion that You requested.

Your various rights at law include:

Your Right of Access

You may, at any time request Us to confirm whether or not We are processing Personal Data that concerns You and, if We are, You shall have the right to access that Personal Data and to the following information:

- What Personal Data We have,
- Why We process them,
- Who We disclose them to,
- How long We intend on keeping them for (where possible),
- Whether We transfer them abroad and the safeguards We take to protect them,
- What Your rights are,
- How You can make a complaint,

- Where We got Your Personal Data from.

Upon request, We shall (without adversely affecting the rights and freedoms of others including Our own) provide You with a copy of the Personal Data undergoing processing within one month of receipt of the request, which period may be extended by two months where necessary, taking into account the complexity and number of the requests. We shall inform You of any such extension within one month of receipt of the request, together with the reasons for the delay.

Your Right to Rectification

You have the right to ask Us to rectify inaccurate Personal Data and to complete incomplete Personal Data concerning You. We may seek to verify the accuracy of the data before rectifying it.

Your Right to Erasure (The Right to be Forgotten)

You have the right to ask Us to delete Your Personal Data and We shall comply without undue delay but only where:

- The Personal Data are no longer necessary for the purposes for which they were collected; or
- You have withdrawn Your consent (in those instances where We process on the basis of Your consent) and We have no other legal ground to process Your Personal Data; or
- You shall have successfully exercised Your **right to object** (as explained [below](#)); or
- Your Personal Data shall have been processed unlawfully; or
- There exists a legal obligation to which We are subject; or
- Special circumstances exist in connection with certain children's rights.

In any case, We shall not be legally bound to comply with Your erasure request if the processing of Your Personal Data is necessary:

- for compliance with a legal obligation to which We are subject (including but not limited to Our data retention obligations); or
- for the establishment, exercise or defence of legal claims.

There are other legal grounds entitling Us to refuse erasure requests although the two instances above are the most likely grounds that may be invoked by Us to deny such requests.

Your Right to Data Restriction

You have the right to ask Us to restrict (that is, store but not further process) Your Personal Data but only where:

- The accuracy of Your Personal Data is contested (see the **right to data rectification** above), for a period enabling Us to verify the accuracy of the Personal Data; or
- The processing is unlawful and You oppose the erasure of Your Personal Data; or
- We no longer need the Personal Data for the purposes for which they were collected but You need the Personal Data for the establishment, exercise or defence of legal claims; or
- You exercised Your right to object and verification of Our legitimate grounds to override Your objection is pending.

Following Your request for restriction, except for storing Your Personal Data, We may only process Your Personal Data:

- Where We have Your consent; or
- For the establishment, exercise or defence of legal claims; or
- For the protection of the rights of another natural or legal person; or
- For reasons of important public interest.

Your Right to Data Portability

You have the right to ask Us to provide Your Personal Data (that You shall have provided to Us) to You in a structured, commonly used, machine-readable format, or (where technically feasible) to have it 'ported' directly to another data controller, provided this does not adversely affect the rights and freedoms of others. This right shall only apply where:

- The processing is based on Your consent or on the performance of a contract with You; and
- The processing is carried out by automated means.

Your Right to Withdraw Consent (when We rely on consent)

See Our [Special Note on Consent](#) for detailed information on this right (**which You may exercise at any time**).

Your Right to Object to Certain Processing

In those cases where We only process Your Personal Data when this is 1.) necessary for the performance of a task carried out in the public interest or 2.) when processing is necessary for the purposes of the legitimate interests pursued by Us or by a third party, You shall have the right to object to processing of Your Personal Data by Us. Where an objection is entered, the processing of data shall cease, unless We as data controller provide compelling and legitimate grounds requiring the continuation of the data processing which outweigh the objections You may have raised.

When Your data is processed for direct marketing purposes, You have the right to object **at any time** to the processing of Your Personal Data, which includes profiling to the extent that it is related to such direct marketing.

For the avoidance of all doubt, when We process Your Personal Data when this is necessary for the performance of a contract, when necessary for compliance with a legal obligation to which We are subject or when processing is necessary to protect Your vital interests or those of another natural person, this general right to object shall **not** subsist.

Your Right to lodge a Complaint

You also have the right to lodge complaints with the appropriate Data Protection Supervisory Authority. The competent authority in Malta is the [Office of the Information and Data Protection Commissioner \(OIDPC\)](#).

We kindly ask that You please attempt to resolve any issues You may have with Us first (even though, as stated above, You have a right to contact the competent authority at any time).

WHAT WE MAY REQUIRE FROM YOU

As one of the security measures We implement, before being in the position to help You exercise Your rights as described above We may need to verify Your identity to ensure that We do not disclose to or share any Personal Data with any unauthorised individuals.

TIME LIMIT FOR A RESPONSE

We try to reply to all legitimate requests within one month from receiving them. In some particular cases (for example, if the matter is particularly complex or if You send Us multiple requests), it may take Us longer than a month. In such cases, we will notify You accordingly and keep You updated.

AP VALLETTA - COMPANY DETAILS

AP Valletta Ltd a company registered in **Malta** with company registration number (C 47097) and whose registered office address is at 4, Sapper Street, Valletta, VLT11 **Malta** is the data controller responsible for processing Your Personal Data that takes place via the Site or in the manner explained above (or in the condensed privacy policy or notice that directed You here).

If You have any questions/ comments about privacy or should You wish to exercise any of Your individual rights, please contact Us at: info@apvalletta.eu or by writing to Davinia Galea, Director of Management at the address above by phoning Us using telephone number (+356) 21 243981 (during normal office hours).

UPDATES

We reserve the right, at Our complete discretion, to change, modify, add and/or remove portions of this Privacy Policy at any time. If You are an existing client with whom We have a contractual relationship You shall be informed by Us of any changes made to this Privacy Policy (as well as other terms and conditions relevant to the Site).

As a User of the Site with which We have no contractual relationship or even a lawful way of tracing, it is in Your interest to regularly check for any updates to this Privacy Policy (which are usually deemed to be effective on the date they are published on the Site), in the event that Our attempts to notify You of such updates do not reach You.

Last Updated on 8 October 2018