



# PRIVACY POLICY

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## 1. Introduction

1.1. This Privacy Policy (the “**Policy**”) has been issued by and relates to GY Academy Limited (Company Registration Number: 86007) (hereinafter the “**Company**”) and explains the Company’s processes in relation to the protection, processing and retention of your personal data in accordance with the provisions of Regulation (EU) 2016/679 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 (herein after, the “**General Data Protection Regulation**” or “**GDPR**”).

1.2. For the avoidance of any doubt, references to “us”, “our” and “we” shall refer to the Company or any one of our employees, associates, contractors, trainees or interns. Reference to “you” or “your” shall refer to yourself as the Data Subject.

1.3. The Company is the controller of your personal data and may be contacted by email, telephone or postal mail. The relevant contact details of the controller are included below:

**Email:** [info@gyacademy.com](mailto:info@gyacademy.com)

**Tel.:** +356 7936 3997

**Mail:** GY Academy Limited, E305, The Hub, Triq Sant’ Andrija, San Gwann SGN1612, Malta

1.4. This Policy aims to provide you with all information to help you understand how the Company processes your personal data when visiting our website (gyacademy.com), Facebook or LinkedIn page or any other online portal maintained by the Company (collectively referred to as “**our Websites**”).

1.5. We always process personal data lawfully, fairly and in a transparent manner and we only collect personal data which is adequate, relevant and limited to what is necessary in relation to the purposes listed in section 4 of this Policy.



## 2. What is personal data?

2.1. According to the GDPR, “personal data” refers to any information relating to an **identified or identifiable natural person** (being the data subject), and therefore, does not include anonymous data or data relating to a legal person.

2.2. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## 3. What personal data do we process and when do we collect it?

3.1. We collect information about you from a variety of sources, including:

- information we collect from you directly, such as in the case of you emailing us or filling out a contact form;
- information we collect about you when you visit our Websites, use our mobile applications or services, or view our online advertisements or social media posts;
- information that you have made publicly available, such as social media posts;
- information we collect about you from other sources.

3.2. The information referred to above may include personal data such as your:

- name and surname;
- contact details;
- residential and/or office/business/work address or location;
- place and date of birth;
- nationality;
- social security / national insurance number;
- marital status;
- bank account details;
- copies of Identity Cards and/or Passports;
- IP address;
- Qualifications and employment history together with any other information listed on a resume or CV;
- details about your current remuneration, pension and benefits;
- gender.



3.3. Our Websites also make use of cookies, which are small text files that a website may place on your computer or device when you visit a particular website. Cookies record your online identity and remember your online behaviour and preferences. For more information on how we use cookies, please refer to our Cookies Policy.

## 4. Why do we process personal data?

4.1. We collect and process personal data through our Websites for a variety of reasons, which include:

- to operate our business and provide, improve and personalize the courses and services we offer;
- to answer any queries;
- to send communications, including promotional communications and news updates;
- statistical purposes;
- marketing purposes;
- customer support and complaints handling;
- to honour our legal obligations in terms of applicable legislation; and/or
- to follow your instructions, such as in the case of applying for an opportunity with the Company, which may entail the transmission of your CV/resume to the appropriate human resources personnel.

## 5. Do we pass on personal data to third parties?

5.1. We may disclose your personal data to third parties in the following circumstances.

- i. **To our agents, affiliates and suppliers.** We may, for example, engage a supplier to carry out professional, administrative and/or operational work in support of our relationship with you. The supplier(s) will be subject to contractual and other legal obligations to preserve the confidentiality of your data and to respect your privacy and will only have access to the data they need to perform their functions or service. These suppliers are typically marketing agencies, lawyers, consultants, accountants, auditors, IT suppliers (who host or support our IT systems, including information about you).
- ii. **To government, police, regulators or law enforcement agencies.** We will share your data with government, police, regulators or law enforcement agencies if, at our sole discretion, we consider that we are legally obliged or authorised to do so or it would be prudent to do so.



## 6. What if you don't want to provide personal data?

6.1. Should you prefer not to provide us with your personal data, then we will remove you from our customer database (if applicable) and cease all marketing or other communications with you. In addition, we will also erase any personal data you may have previously supplied to us, unless we can demonstrate legitimate grounds which overrides your interest and rights or due to legal claims.

6.2. With respect to cookies, you can manage or prevent cookies from being installed on your device by adjusting the settings on your browser accordingly. For more information on how you can manage cookies, please refer to our Cookies Policy.

## 7. Your rights as a Data Subject

**7.1. Correcting and completing personal data.** We take every reasonable step to ensure that the personal data we have in our possession is accurate and kept up to date. However, it is still possible for certain personal data to be incorrect or incomplete. Should you, therefore, wish to correct or complete any inaccurate or incomplete personal data that we hold, you may do so by sending us an email highlighting the data that requires correction or completion, as the case may be. After receiving any such communication and, if we deem necessary, ensuring that such communication is legitimate and originates from yourself as the data subject, we will update our records without undue delay and inform you once this has been done.

**7.2. The right of access and the right to be forgotten.** As a data subject, you have the right to access your personal data and, in certain situations, the right to request that we erase your personal data without undue delay. Should you like to access your personal data that we hold on you or should you wish that we erase your personal data, you are kindly requested to send us an email. It should be noted that we will erase your personal data as soon as possible, provided that such personal data are no longer necessary for the purposes (as specified in section 4 of this Policy) for which they were originally collected or processed.

**7.3. Data portability.** You may also request a copy of your personal data, which will be supplied in any machine-readable format selected by us. This will be released either to yourself or, if technically feasible, to another controller designated by yourself.

**7.4. Restriction of processing.** You may also request that we restrict the processing of your personal data if:



1. the accuracy of the personal data is contested, for a period enabling us to verify the accuracy of the personal data;
2. the processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead;
3. we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims.

Should we agree to restrict the processing of your personal data pursuant to any of the grounds listed above, we shall inform you in writing before the restriction of processing is lifted.

**7.5. Opting out.** Where personal data are processed for direct marketing purposes, you have the right to object at any time to such processing. You can do this by (i) asking us to stop sending marketing communications (unsubscribe) by clicking on the “unsubscribe” hyperlink included in all marketing communications sent to you; (ii) replying to the email communication quoting the text “unsubscribe”; or (iii) sending us a request in writing, letting us know that we should cease the processing of personal data for direct marketing purposes.

**7.6. Unauthorised access to your data (data breach).** If your personal data is stolen, lost or illegally accessed, we are legally required to report it to the national data protection authority. The data controller must also inform you directly if there are serious risks related to your personal data or privacy due to the breach.

## **8. Can we transfer your personal data outside the EEA?**

8.1. There may be situations where your personal data can be transferred and processed in one or more non-EEA (European Economic Area) countries. In any such situations, we will take steps to ensure that your personal data receives the same level of protection as if it remained within the EEA, including by entering into data transfer agreements, using the European Commission’s approved contractual clauses for data transfers to third countries, or by relying on certification schemes such as the EU - US Privacy Shield or other valid mechanisms for data transfers. You may also request information on the protective measures implemented for any third-country transfers of personal data.

## **9. How long do we keep your personal data?**

9.1. We make every effort to ensure that personal data are kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the



personal data are processed. We typically erase the personal data we have on record within ten (10) years from the end of our relationship with the Data Subject in question.

## **10. How will we notify you of changes to this Policy?**

10.1. Certain terms in this Policy may be amended from time to time. The latest version shall always be available on our website - [gyacademy.com](http://gyacademy.com).

## **11. How can I complain?**

11.1. You have the right to lodge a complaint with the relevant supervisory authority for data protection. In Malta, this is the Data Protection Commissioner ([idpc.org.mt](http://idpc.org.mt)). We would also welcome the opportunity and make every effort to satisfactorily deal with your complaint amicably before you approach any such supervisory authority.