

Malta Business School

Privacy Policy - Appendix D

Online users

Revision History			
Version Number	Revision Date	Revised by	Summary of changes
Version 0	25-07-2018	RBM	
Version 1	07-09-2022	CC	Minor edits
Version 2	31-01-2024	CC	Review, no edits.
Version 3	08-10-2025	SG	Consolidation of data sources under one policy

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MBS Privacy Policy - Appendix D

1. Document scope and purpose

This appendix is a supporting document to the MBS Privacy Policy (the “Main Policy”) and is intended to provide additional, specific information relevant to Online Users (Web, Social Media, Email, or Other Communications).

It must be read together with Malta Business School’s (MBS) Main Privacy Policy, which sets out the overarching principles, rights, and obligations regarding the processing of personal data. This appendix does not stand alone and cannot be circulated, distributed, or relied upon as an independent document.

The purpose of this appendix is to:

- Provide category-specific details on the types of personal data collected, purposes of processing, data access, and retention;
- Clarify any additional obligations or procedures relevant to this group of data providers;
- Ensure that the processing of personal data is fully compliant with GDPR and the Data Protection Act (Chapter 586 of the Laws of Malta).

2. What information we collect

MBS processes personal data relating to its website visitors or to any other individuals who give us their personal data through email, by telephone or through social media applications. By “processing” we mean a set of activities that is carried out in relation to your data such as the collection, recording, storage, use and erasure of such data which includes:

2.1 Website cookies

Website cookies are small files of letters and numbers created by individuals or entities to store on your browser or the hard drive of your computer if you agree. Cookies therefore contain information that is transferred to your computer’s hard drive.

We use the following first-party cookies on our website that are essential for the website to operate correctly. These cookies are as follows:

- Visitor ID – this cookie is a numeric value that identifies unique visitors and provides coherence and consistency to a site visit;
- Page Number – this cookie identifies the page you are on;
- Session ID – this cookie identifies your website session;
- Test – this cookie checks whether or not your browser supports cookies.

In addition, and in order to ensure that each visitor to our website can use and navigate the site effectively, we collect the following:

- Technical information, including the Internet Protocol (IP) address used to connect your device to the Internet;
- Your login information, browser type and version, time zone setting, browser plug-in types and versions;
- Operating system and platform;
- Information about your visit, including the Uniform Resource Locators (URL) clickstream to, through, and from our site.

Our website may set several types of third-party cookies which we do not control including: Google Analytics, AddThis, Facebook, LinkedIn and Twitter. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access parts of our website that use or link to third-party cookies.

2.2 Personal information

Personal information that you may disclose to us include (i) your particulars such as your name and surname, identity card or passport number, postal address, e-mail address, date of birth and gender, (ii) a list of your qualifications, skills, experience and areas of relevant expertise, business sector, business contacts and projects experience, (iii) any other personal data that you wish to disclose directly or indirectly in connection with your queries or communications with us including bank account details.

3. How do we collect your personal data?

We may collect your personal data in one or more of the following ways:

- *Through your disclosure.* More often than not the information is disclosed by you and collected through application forms, contact forms, email and other correspondence, social media messages and posts and telephone conversations.
- *Through third parties.* Personal information may be processed via third-party websites such as Google and through social media applications such as Facebook, LinkedIn and Twitter.

4. Where do we keep your data?

The company's website is hosted in the European Union. Our hosting service provider and cloud service providers are based in the European Union and act solely on our instructions vis-à-vis your personal data. Your personal data is held in our IT systems (including MBS's email system, internal server and cloud systems).

5. Why do we need your data and what is the legal basis for its processing?

MBS needs to process your personal data for one or more of the following purposes:

- to provide you with information that you have requested or which we think may be relevant to a subject in which you have demonstrated an interest;
- to initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services;
- to manage any communication between you and us.
- To prevent or investigate fraud or other unlawful activity, and to protect the security of the company's property, website, and other systems.
- To meet the obligations of public or private entities with oversight over Malta Business School, such as accreditation organizations
- To protect the health, safety, or rights of you, other students, faculty, staff, and visitors

The legal basis for the processing of such data is one or more of the following:

- *your consent*: we may rely on your consent to process personal data including personal contact information as provided through website forms, email or any other means. Your consent may be required for subscription to our mailing list, for direct marketing purposes or when you enter the website to accept the use of first-party or third-party cookies;
- *legal obligation*: we may be compelled to disclose your data to state authorities to ensure compliance with laws to which we may be subject;
- *a legitimate interest*: in other cases, MBS has a legitimate interest in processing your personal data. These cases include: (i) when we provide you with information that you have requested or which we think may be relevant to a subject in which you have previously demonstrated an interest; (ii) when we follow-up to ensure the requested information meets needs and identify further requirements, (iii) when we need to supply documentation should any contractual legal claim arise; (iv) when we need to protect our website and infrastructure from cyber attacks or other threats and to report and deal with any illegal acts, (v) when we communicate with you about any issue that you raise with us or which follows from an interaction between us, (vi) monitoring our website usage

As part of the registration of your initial queries or requests for information through our website, through email or through social media, we invite you to give us your consent to add your email to our mailing list including by subscribing to our newsletter. We use this information for a number of reasons: to give you information about anything you've asked us to tell you about; to contact you if we need to obtain or provide additional information including information which we think may be relevant to a subject in which you have previously demonstrated an interest; to check our records are right and to check every now and then that you're happy and satisfied. We don't rent or trade email lists with other organisations and businesses. We also invite you separately to give us your consent to use your information for direct marketing purposes. In all cases you may unsubscribe at any point using the unsubscribe link on any of our emails.

When cookies are used on our website, these help us to provide you with a good experience when you browse our website and also allow us to improve our site:

- Google Analytics: this is used to collect data about website usage. This data does not include personally identifiable information. You can view the Google Privacy Policy here: www.google.com/policies/privacy/
- AddThis: the AddThis cookie is used when you use the ShareThis service on our website to share a link with LinkedIn, Facebook, Twitter, etc. You can read the AddThis Privacy Policy here: <http://www.addthis.com/privacy/privacy-policy>
- Facebook: we use a Facebook pixel to obtain information regarding the activities that users engage in while visiting our web pages. For information on Facebook's Privacy and Cookie policy, visit <https://www.facebook.com/policies/cookies>

6. Who has access to your data

As outlined in MBS's main data privacy policy document, your personal data is not accessed except by other employees in the performance of their duties. Access to IT systems is restricted and monitored.

In line with the GDPR, our company will only transfer your personal data to a country outside the European Union or the European Economic Area when the European Commission has decided that such country ensures an adequate level of protection.

7. How long will the information be stored for?

As outlined in MBS's main data privacy policy document, Generic personal data is held for a maximum period of ten (10) years following its collection, unless we are compelled to retain such data in exceptional circumstances such as to defend or pursue legal claims. Data relating to Student Academic Records is retained for a period of forty (40) years, in line statutory requirements for student academic records.

Upon the expiry of the retention period your personal data will be deleted permanently from our cloud and IT systems and any documents containing such data will be shredded in-house and safely destroyed in line with established industrial standards.

Changes to this Appendix

This document was last updated on the 8th of October 2025 and will be subject to an annual review. Changes to this document will be publicised through the usual channels of communications that we use to communicate with you.