

**Malta Business School**  
**Privacy Policy - Appendix A**  
**Students and alumni**  
**2025**

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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Malta Business School

## 10.1 Appendix A

### 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 current Malta Business School(MBS) Students and Alumni.

It must be read together with the Main 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 pertaining to its alumni. 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:

- Your particulars such as your title, name and surname, sex, date of birth, ethnicity, nationality, country of permanent residence, identity card or passport number, postal address, e-mail address, other contact details, details of current employment including salary, details of amongst other details that might be required;
- Your academic information (e.g., list of your qualifications);
- Your involvement with the School and other interests (e.g., attendance at events);
- Family information (e.g., marital status, name of spouse);
- Health information (e.g., disability, food allergies);
- Employment information;
- 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 forms completed by you, from emails and other correspondence, social media messages and posts and telephone conversations with you.
- **Through your past disclosure.** We also retain information from your student records. More often than not the information is disclosed by you and collected through forms.
- **Through third parties.** Personal information may also be processed via people that might know you and third-party websites such as Google and through social media applications such as Facebook, LinkedIn and Twitter.

#### 4. Where do we keep your data?

Your personal data is stored in a range of different places including:

- In our CRM System;
- In your Student or Alumnus file;
- In other IT systems (including MBS's email, storage and cloud servers).

#### 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 services or perform on contractual obligations such as providing certain student and/or alumni services.

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 where no other legal ground for processing is applicable;
- **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 so as to be able to maintaining student and alumni relationships.

Students and all alumni are automatically retained on our mailing list including for direct marketing purposes (although alumni may at any time request us to stop processing their personal data in this manner) as this is a legitimate interest of the Company.

We use our mailing list 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 may also process your personal data for direct marketing purposes but you have a right to object to this in which case we'll immediately stop processing the data for such purposes. In all cases you may unsubscribe at any point using the unsubscribe link on any of our emails.

#### 6. Who has access to your data

The following may have access to your data:

- Other School students or alumni (limited contact information only) or alumni of the Henley Business School, the case of Henley Business School current students or Alumni.
- Specific alumni clubs and organizations and similar affiliates.
- Other individuals or entities with a legitimate interest in your personal information, such as scholarship supporters.
- The Company's employees in the performance of their duties and on a need-to-know basis.
- Contractors who provide services to the School on a need-to-know basis.

As already disclosed we may also need to share your data with public or private entities with oversight over the School such as accreditation organizations.

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 or else if otherwise compelled by law

### **7. How long will the information be stored for?**

We will keep your personal data only for as long as we need it for the purpose it is being processed for. In setting retention periods we take into account our business and administrative needs to process your data, as well as, our legal obligations to retain your personal data. In the case of academic records this period is of forty (40) years, in line with statutory requirements for student academic records. We will actively review the information we hold and delete it securely, or in some cases anonymise it, when there is no longer a legal, business or administrative purpose for it to be retained.

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.

### **8. Changes to this Appendix**

This document was last updated on the 8<sup>th</sup> 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.

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