



## AM LANGUAGE STUDENT PRIVACY NOTICE

### Introduction

This privacy notice is intended to provide you with all the necessary information relating to how we, Toro Company Limited (C-24225) ('**We**', or the '**Company**') collect and process your personal data, in your capacity as a student at AM Language (the '**School**'), a business operated by the Company.

We recommend that you read this privacy notice carefully, as it will provide you with all the necessary information to understand:

- How we collect your personal data;
- Why we need to process your personal data;
- What your data protection rights are;
- Who has access to your personal data;
- How we might transfer your personal data to other persons or locations;
- How long we store your personal data.

You are entitled to have a precise knowledge of how we treat your personal data, so should you require any clarification about the contents of this notice, we encourage you to contact us or our Data Protection Officer through the details set out herein.

### Who is the Data Controller?

A data controller is the person who shall have the discretion to determine the purpose for which your personal data will be processed, as well as how this processing will take place.

The data controller shall have the responsibility for ensuring that the collection and processing of your personal data is carried out in full conformity with the provisions of all applicable data protection laws, and for ensuring that you, the 'data subject', continually have access to all of your data protection rights.

**Toro Company Limited** is the lawful data controller with respect to your personal data for the purposes of this notice, having its registered office at AM Language, 299, Manuel Dimech Street, Sliema, SLM 1504, Malta.

You may contact the data controller by using the following contact information:

Email: info@amlanguage.com  
Phone: +356 21324242  
Post: 299 Triq Manwel Dimech Sliema SLM 1054

### Who is our Data Protection Officer?

The Company's business requires a considerable volume of data processing activity.

We effectively process a wide range of data belonging to a variety of different data subjects, which may also include minors, given that the School is primarily focused on providing educational, accommodation and recreational services to students.

Given the above, we have determined that it would benefit our processes to appoint a Data Protection Officer, who shall be responsible for monitoring and maintaining our data processing activities.

Our Data Protection Officer is Julian Cassar Torregiani

AM Language  
299 Manwel Dimech Street Sliema SLM1054 Malta  
Tel +356 21324242  
Issue 1.0

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ACCREDITED BY



You may contact the Data Protection Officer by using the following contact information:

Email: dpo@amlanguage.com  
Phone: +356 21 324242  
Post: 299 Triq Manwel Dimech Sliema SLM 1054

A vital part of the Data Protection Officer's function is to act as a first point of contact for you. Therefore, you should feel free to contact the Data Protection Officer should you have any questions relating to the contents of this notice or your data protection rights.

You should also refer to the Data Protection Officer if you wish to report any privacy issues relating to your personal data or the personal data of others.

### **What personal data do we collect from you?**

We collect, store, process, and maintain various different types of personal information about you, which include the following categories:

- Your **personal details**; such as your name, address, date of birth, contact information, nationality, languages spoken, emergency contact information, hours of daily availability.
- Your **attendance information**; such as your attendance records, absence records, requests and approvals of absence, and relevant medical records.
- Your **performance information**; such as your test results, your disciplinary information, and feedback received from your teachers.
- Your **billing information**; such as your bank details and tax information.
- Other details; such as allergies, diet requirements, learning disability, physical disability.

We will only collect special categories of personal information – such as details of any disability, political ethnic origin, religion, sexual orientation, or mental or physical health conditions – in the case that you explicitly volunteer to provide us with this information, and only in the case that this information is explicitly necessary to allow us to perform our obligations towards you.

Should we collect any sensitive information, we will only process this when strictly necessary and will delete such information at the earliest possibility.

### **How do we collect your personal data?**

We collect your personal information through a variety of sources, but in most circumstances we acquire this information directly from you.

You provide this information to us when you express an interest in attending the School and provide us with initial information as to your requirements, as well as when you fill in your introductory enrolment forms, and when you communicate with us to express concerns, make inquiries, or other similar actions.

We will also collect information on you by observing your daily performance at the School, such as your attendance records and test performance records.

We may also obtain some information from third parties, such as from your previous or current school.

For security purposes only, we utilise a system of CCTV surveillance cameras to monitor activity throughout our premises, excluding activity within classrooms and bathrooms. Any data which is captured is retained for a limited period of time unless an event occurs, which we become aware of, which explicitly warrants the retention of the relevant data. Appropriate signage indicates areas covered by the CCTV surveillance system.

### **Why do we need to process your personal information?**

The principle reason why we collect and process your personal data is because we need this information to be able to perform our contractual obligations towards you, arising out of your attendance at the School.

We may also process this personal data for reasons relating to our own legal obligations at law, such as our statutory auditing and accounting requirements.

Processing your personal data is a fundamental aspect of our ability to comply with our obligations towards you.

We use your personal data to:

- To communicate effectively with you by post, by email, or by phone;
- To create records of your academic progress;
- To administer students-related policies and procedures, such as appeals, complaints, or disciplinary matters;
- To regulate and support your health, safety and welfare;
- To prevent and detect crime;
- To deal with legal disputes which relate to you, or involve you;
- To comply with our legal obligations as per the applicable statutory laws.

### **When do we share personal data?**

As part of our efforts to protect the confidentiality of your personal data, we endeavour to ensure that your personal data is handled by as few persons within the Company as possible, in order to avoid allowing more access than is needed to your personal data.

However, from time to time we may need to disclose your personal data to third parties who provide us with services required by us for legitimate business needs. These may include our IT service providers, our accountants and auditors, our legal advisors and third party contactors involved in the delivery of our services to our customers.

We will ensure that even when your data is transferred to third parties, such personal data is treated with the utmost care and confidentiality, and in full conformity with all data protection laws in all aspects of the data's processing.

Appropriate data transfer agreements will be entered into by and between the Company and any third party processor of your personal data, to ensure that appropriate safeguards are implemented by any third parties who receive your personal data from us.

Only third parties who demonstrate that they have adequate structural safeguards to protect your data (such as appropriate cybersecurity systems) and who commit to maintaining these safeguards at all times, will be considered fit to receive your personal data.

### **Where do we store and process personal data?**

In order to ensure minimal access to your personal data, we take care to store data in as few repositories as possible.

Data is physically stored, under lock and key, in Malta, either within the premises of the company or at the premises of a third party archiver.

Electronic storage of data will be in password protected applications accessible to limited members of staff.

### **How do we secure personal data?**

The secure physical container holding the Company's physical data will be kept locked at all times, only being unlocked to allow for intermittent access as may be necessary.

In order to secure the Company's electronic data, the Company has in place the following cybersecurity measures:

- All computers and electronic devices which may allow access to the Company's personal data shall be password-locked at all times;
- Access to the Company's electronic data shall be administered solely by the Company in accordance with procedures agreed to with the Data Protection Officer;
- Users profiles are protected by passwords
- Passwords changes are enforced regularly
- Password complexity is enforced
- Password history settings are used to ensure that users do not repeatedly reuse the same password
- Antivirus software is in place and kept up to date
- Hardware and software firewalls are in place and kept up to date
- Common folders access rights – read and write is controlled

Internal access to this data will be arranged on a 'need to know' basis in order to restrict dispersal of data, and to prevent theft or the accidental loss of data.

### **What are your rights in relation to personal data?**

As a data subject, you enjoy various rights to access, control, and request information relating to, your personal data.

In practice, this means that there are a multitude of ways how you can exercise your data subject rights, and we are committed towards ensuring that we comply quickly and effectively whenever you would like to exercise your data subject rights.

You are fully entitled to:

- Ask to see what information we hold about you;
- Ask what we do with the information we hold about you;
- Ask us to delete the data we hold about you;
- Ask us to stop processing the data we hold about you;
- Ask us to amend data about you which you believe is inaccurate;
- Ask us to transfer your data to a third party;
- Ask us to restrict or limit what we do with your data.

We will inform you when we mandatorily require your personal information in order to be able to perform our obligations towards you.

In order to exercise any of your personal data rights, you should contact the Data Protection Officer of the Company, or any representative of the Company who will then forward your request accordingly.

Your data subject rights may be limited in circumstances where, in order to comply with your request, we would need to unduly expose personal data about someone else, or where the data you ask us to delete or amend is required for us to perform our contractual obligations towards you, or if we require such data to comply with our legal obligations.

In the case that you have a complaint in relation to the processing of your personal data, you have the right to lodge a complaint at any time to the Information and Data Protection Commissioner.

You lodge a complaint at <https://idpc.org.mt/en/Pages/contact/complaints.aspx>, or you may contact the Information and Data Protection Commissioner through the following channels:

Email: [idpc.info@idpc.org.mt](mailto:idpc.info@idpc.org.mt)

Phone: (+356) 2328 7100

Post: Information and Data Protection Commissioner  
Floor 2, Airways House  
High Street  
Sliema, SLM 1549  
Malta

### **How long do we keep your personal data for?**

We will only retain your personal data for as long as necessary for us to fulfil the purpose for which we collected it.

To determine the appropriate retention period for each category of personal data, we will consider the nature and sensitivity of the personal data, whether or not the personal data will be required for the fulfilment of any further contractual obligations towards you, and whether we will require the personal data to comply with our legal obligations.

We encourage you to contact us if you would like to request information relating to the retention period applicable to a specific type of information.

### **How to contact us?**

You should feel free to contact Data Protection Officer of the Company if you would like to request any clarification as to the contents of this notice, or if you would like to exercise any of your data subject rights, or if you would like to log a complaint.

Any requests forwarded to persons other than the Data Protection Officer will, as a matter of internal policy, be forwarded to the Data Protection Officer.

### **Our Privacy Policy**

If you would like to know more about how we process your personal information and how we ensure that your lawful rights and protections are respected at all times, you can obtain a copy of our privacy policy, which sets out our internal data processing procedures in full, by sending a request via email to [dpo@amlanguage.com](mailto:dpo@amlanguage.com)