



## PRIVACY POLICY

### INTRODUCTION

This Privacy policy (“**Privacy Policy**”) relates to the website [www.aplusacademy.com.mt](http://www.aplusacademy.com.mt) and/or any sub-website and/or associated domains of [www.aplusacademy.com.mt](http://www.aplusacademy.com.mt) including any other media form such as the Facebook page <https://www.facebook.com/accaprivatetuitionaplustacademy/>, media channel, mobile website, or mobile application related or connected thereto (hereinafter referred to as the “**Site**”); emails; or letters/forms given to Us by hand. The Site is owned by JA Services Limited, a company incorporated under the laws of Malta with company registration number C 94586 and having its registered address situated at Albatross, 21, Mons. Arturo Bonnici Street, Swatar MSD 2257, Malta (“**JA Services Limited**”).

In this Privacy Policy, "We", "Us", "Our", “Ourselves” and/or “Academy” shall refer to JA Services Limited and "You" and "Your" and “User” shall refer to an identified or identifiable natural person being the user of this Site and/or customers of any of the Academy’s services.

This Privacy Policy explains how We assemble, safeguard, use and disclose Your information when You visit Our Site or any personal data We obtain from You by email or letter/form. Additionally, We explain Your rights when it comes to personal information,

In this Privacy Policy, Your information is sometimes called “personal data” or “personal information”. We may also sometimes collectively refer to handling, collecting, protecting and storing Your personal information as “processing” such personal information.

### WHO’S IN CONTROL OF YOUR INFORMATION?

The Academy is the data controller of Your information. We take the privacy of Our users seriously and it is Our duty to protect Your privacy and handle Your information in an open and transparent manner. We kindly ask You to read this privacy policy carefully. Should You not be in agreement with the terms of this privacy policy, kindly tick the box ‘I do not agree with the terms of this privacy policy’ before signing this policy.

The Academy is primarily responsible for safeguarding the personal data We obtain, however, some information may be held in databases that are managed by third-party companies. All third-party companies We use are compliant with the standards set out in this privacy notice.

### NOTIFICATION OF CHANGES TO THIS POLICY

We reserve the right to, at any time and whatever the reason is, change this Privacy Policy. Any amendments made to this Privacy Policy shall apply once they are sent to you by email and/or updated on the Site. You will note that the Privacy Policy has changed on the Site by referring to the “Last Updated” date.

Should this Privacy Policy be revised and You continue to use Our Site and/or services, You will be deemed to have been made aware of, subject to, and deemed to have accepted, such changes.



## WHAT IS PERSONAL DATA?

Personal Data refers to personally identifiable information about You, such as Your name, birth date, e-mail address or mailing address, and any other information that is identified with You personally.

We collect Personal Data by email, letter or digitally via the Site (either when You choose to provide Us with certain data or in some cases, automatically or from third parties).

## FAILURE TO PROVIDE PERSONAL DATA

If You fail to provide Us with personal data when requested in circumstances where it is needed by law, or under the terms of a contract We have or We will be entering with you, the Academy may not be able to perform the contract We have or are trying to enter into with You (for example, to enrol You in a course). In such cases, the Academy may have to cancel Your application but You will be notified if this is the case at the time.

## COLLECTION OF YOUR INFORMATION

The Academy uses different methods of data collection from and about the website users including through:

a) Direct interactions

You may give Us Your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data You provide when You:

- apply for Our courses;
- create an account on Our website;
- subscribe to Our mailing list; or
- give us feedback.

b) Automated technologies or interactions

As You interact with Our website, We may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.

c) Third parties or publicly available sources

We may receive personal data about you from various third parties such as analytics providers including Google and Facebook based outside the EU.

## USE OF YOUR INFORMATION

Your personal data is only used when We are allowed to do so according to the law. The Academy will use Your personal data in the following scenarios:

1. To enter into an agreement with You such as register you for a course.



2. If necessary for Our legitimate interests (or those of a third party) and Your interests and fundamental rights do not override those interests.
3. To notify You about events, new courses, programmes.
4. To ask You to leave a review.
5. If We need to comply with a legal or regulatory obligation.
6. To make suggestions and recommendations to You about courses that may be of interest to You and/or the company You work for.
7. Inform You about any updates We make to the Site.
8. Collect statistical data and analysis to be used for internal purposes or with third parties.
9. Promote advertising to You such as about Our new services and/or recommendations.

## DISCLOSURE OF YOUR INFORMATION

We may disclose details about You in the following cases:

1. Competent authorities may require Us to disclose information about You due to a legal procedure or investigation.
2. We may further release Your information as permitted or required by data protection legislation and subsidiary legislation thereto in the event where there are violations of Our policies, or to protect the rights, property, and safety of others.
3. To selected third parties who may process Personal Data on Our behalf.
4. To third parties such as ACCA or Malta Institute of Accountants ('MIA') who may use Your personal data or sensitive personal data (as appropriate) to:
  - enable Us to fulfil Our contractual obligations to You – for example by providing You with an examination certificate;
  - contact You directly about events, courses, programmes, or ACCA membership;
  - carry out statistical analysis (on an anonymous basis);
  - pass to their regulator or industry bodies to:
    - a) monitor equal opportunities relating to ethnicity or disability, or for other such monitoring purposes; or
    - b) account for learners where there is a requirement to do so; or
    - c) meet their requirement to contact You directly and the information is not readily accessible from any other source
  - disclose and publish Your details in directories which may contain information about the Academy;
  - provide or arrange prizes, remuneration and awards;
  - undertake that it and its staff will take every reasonable step possible to protect the confidentiality and security of all material it receives, to carry out its various responsibilities.

We may from time to time email or post to You details of products or courses We believe may be of interest to You. If You no longer require such information or You have provided us with any information that You no longer wish Us to use, please email Us at [info@aplusacademy.com.mt](mailto:info@aplusacademy.com.mt) or click on the 'unsubscribe' link in any email.



## **DIRECT MARKETING**

We will use Your personal data to send You promotions regarding products and services that We offer regarding for example new courses, events or programmes. This may be in the form of email or targeted online advertisements.

In some cases Our processing of Your personal data for marketing purposes will be based on Our legitimate interests. When required by law it will be based on Your consent.

You always have a right to say not to accept any direct marketing. This can be done by sending us an email Us on [info@aplusacademy.com.mt](mailto:info@aplusacademy.com.mt) .

We endeavour to limit direct marketing to a reasonable amount, and to send You promotions that We believe may be of interest or relevance to You, based on the information We have about You.

## **SOCIAL MEDIA**

If You contact Us via one of Our social media accounts, We might keep a record of Your display name. We use this to communicate with You and keep an accurate record of Our discussion. We might also analyze public information posted on social media sites to help Us better understand how Our users interact with and discuss Our services.

## **AGE OF CONSENT**

By using this site or by filling out the registration form, You represent that You are at least the age of majority in your state, county, province, region or country of residence, or that You are the age of majority in Your state, county, province, region or country of residence and You have given us Your consent to allow any of Your minor dependents to use this site.

## **SECURITY OF YOUR INFORMATION**

We use various physical, technical and administrative security measures to make sure that Your personal data is kept secured, accurate and up to date. All staff are required to treat all student information in a confidential manner and follow the guidelines of this policy. The Academy is committed to ensuring that all staff are aware of data protection policies, legal requirements and principles. Training is available to staff where required.

Despite the fact that We strive to use appropriate security measures to secure the personal information received by You, We still cannot guarantee the security of data provided to Us or by Us. Whilst We endeavour to protect Your personal data, the transmission of data over the internet is vulnerable and is never totally secure.

## **HOW LONG WE KEEP YOUR INFORMATION FOR?**

We will keep Your personal data on Our systems the later of:

- i. the necessity for the relevant purpose of collection;
- ii. as required by law;
- iii. when litigation or investigations is over.



## **YOUR RIGHTS**

You have lot of rights relating to Your personal information. In particular, You have a right to:

- i. Be informed about how Your personal information is being used (such as defined in this policy).
- ii. Access the personal information We hold about You.
- iii. Request the correction of inaccurate personal information We hold about You.
- iv. Request that We delete Your data, or stop processing it or collecting it, in some circumstances.
- v. Stop direct marketing messages and to withdraw consent for other consent-based processing at any time.
- vi. Request that We transfer or port elements of Your data either to You or another service provider
- vii. Right to complain to Your data protection regulator in Malta.

## **GOVERNING LAW**

This privacy policy is governed by and construed in accordance with the laws of the Republic of Malta and relevant EU legislation.

## **CONTACT DETAILS**

Should You have any questions regarding Our Privacy Policy, You should contact Us either by sending an email to [info@aplusacademy.com.mt](mailto:info@aplusacademy.com.mt) or by writing a letter addressed JA Services Limited, Albatross, 21, Mons. Arturo Bonnici Street, Swatar MSD 2257, Malta.