



GDPR Policy

pursuant to article 13 of EU Regulation no. 679 of 2016 relating to the protection of personal data ("GDPR"), as part of the Services purchased on the Site **mun-malta.com** (hereinafter the "Services").

According to the European Regulation on General Data Protection n. 2016/679/EU (hereinafter "Regulation"), hereby, Y.O. s.r.l. as Data Controller (hereinafter "Data Controller")

INFORMS

the MUNer (also called "Data Subject") or the parent/guardian of the MUNer if a minor, as follows.

DATA CONTROLLER

The data controller is Y.O. s.r.l. with registered office in Via Nomentana 164, 00162 Roma, VAT number/tax code (partita iva) 17654731003. The Data Controller, within the limits inherent and connected to the supply of the Services, may communicate personal data within its business organisation to those in charge of the processing.

The Data Controller has not appointed a Personal Data Protection Officer (DPO).

PURPOSE OF THE PROCESSING AND LEGAL BASIS

The processing is aimed exclusively at the correct and complete execution of the Contract for the purchase of Products or Packages, as defined in the general terms and conditions, which also constitutes its legal basis.

The purpose of the processing consists in the possibility of carrying out and fulfilling all the commitments undertaken in the Contract. To this end, for example, the needs may be to: communicate the data to the teachers and other employees with respect to courses and simulations or to the those who manage the physical locations where the activities included in the Product or Package will take place; communicate the data to the tour operator or to the hotel for the overnight stay; fulfill tax and accounting obligations established by the law; other needs functional to the proper fulfillment of the contract and related thereof.

TRANSFER OF DATA TO A THIRD COUNTRY

The personal data will be transferred by the Data Controller to non-EU countries only and exclusively if necessary for the purposes of the processing. In particular, personal data are communicated to the Authorities of the airports where the Data Subject will have to transit, to the flight company (if non-EU), and to the hotel where the interested party will stay.

In such cases, the data transfer will take place in full compliance to the law, i.e. on the basis of the consent of the Data Subject or under the adoption of Standard Clauses approved by the European Commission, et al. It is possible to obtain further information from the data controller upon request.

PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

According to Article 9 of the EU Reg. 2016/679, the collection of data which may reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric characteristics, as well as data concerning a natural person's health, sex life or sexual orientation, is carried out during the execution of the contract and the Travel Plan only if strictly necessary to protect the vital interests of the data subject and third parties, or if required by the law. For example, the processing may be necessary in case of illness or accident concerning the Data Subject, to prevent them or to mitigate the consequences thereof.

RECIPIENTS OF PERSONAL DATA



Personal data may be communicated to Public Authorities, tax consultants, tax authorities and external consultants, if strictly necessary and relevant to the purposes mentioned above. These subjects or legal entities, unless otherwise established by law, will be appointed as data processors and contractually required to respect the obligations established by the Data Controller aimed at protecting personal data of the Data Subject. Please notice, however, that the Data Controller is not responsible for any failure of the abovementioned subjects to comply with the Regulation.

The personal data collected are also processed by personnel/subjects authorized by the Data Controller, who act on the basis of specific instructions regarding the purposes and methods of the processing itself.

DATA RETENTION PERIOD

The personal data processed under the Contract are retained for the time of its execution. A longer retention period shall be justified by the purpose of protecting the rights of the Data Subject and/or those of the Data Controller, for the time during which the latter is subject to retention obligations established by the law.

DISSEMINATION AND PROFILING OF DATA

The collected personal data are not subject to dissemination nor to any fully automated decision-making process, including profiling.

RIGHTS OF THE DATA SUBJECT

According to the EU Regulation 2016/679 the Data Subject has the right to:

- access to personal data and information relating to them; obtain the rectification of inaccurate data or the integration of incomplete data; obtain the deletion of data; obtain the restriction of processing;
- request and obtain from the Data Controller - in cases in which the legal basis of the processing is the Contract or the consent and the processing is carried out by automated means – data in a structured and machine-readable format, also in order to communicating such data to another data controller (so-called right to data portability);
- object at any time to the processing of personal data on grounds relating to his or her particular situation;
- lodge a complaint with the supervisory authority (Information and Data Protection Commissioner, <https://idpc.org.mt>);

The exercise of the Data Subject's rights in some cases is subject to certain conditions, the full reading of which can be found in the Regulations.

The exercise of some of the rights listed above may be: legitimately limited by the data controller to safeguard the rights of third parties or on the basis of legal provisions; or it could limit the execution of the contract and, in some cases, may cause premature termination (as below specified).

MANDATORY SUPPLY OF DATA

The supply of personal data by the Data Subject is a necessary requirement for the purposes of the contract, which cannot otherwise be executed and/or concluded. Provided that the Data Controller does not have the right to refuse, the object to the processing, the request for deletion of data and/or for their limitation, may lead to the interruption of the contract and of the established relationship.

CONTACT DETAILS OF THE OWNER

Any requests to the Data Controller should be sent to the following addresses: Y.O. s.r.l. at the headquarter of Via Nomentana 164, 00162 Roma, Italia | email: info@mun-malta.com.

When you purchase a Product or Package on the mun-belgium.be, you declare that you have received this information, and that you have read and understood it in all its parts.