

# Security Service Malta Limited

## Privacy Policy

This Privacy Policy sets out how we deal with your Personal Data, in our capacity as Data Controller of this website. If you have any queries about this Privacy Policy or anything it contains, please contact us by e-mail on [info@security.com.mt](mailto:info@security.com.mt) .

Security Service Malta Limited (hereinafter referred to as “SSML”) respects the right to privacy of users of this website. SSML will always seek to protect your Personal Data. This Policy describes how we gather and use such information, the amount of information SSML holds on you and how it uses it.

The following definitions shall have the same meaning as those contained in the General Data Protection Regulation (EU) 2016/679 (“GDPR”): “Data Subject”, “Data Controller”, “Data Processor”, “Personal Data”, “Process” or “Processing”.

Specifically, this Privacy Policy deals with:

- What Information is Collected?
- How we use your Personal Data
- Providing Personal Data to Third Parties
- Retention of Personal Data and the Right to be Forgotten
- Privacy Compliance
- Security
- Third Party Websites
- How we Communicate with you
- Security and Staff Awareness Measures
- Right of Access/Questions
- Data Subject Rights
- Changes to the Privacy Policy
- Who we are and how to contact us

### **What Information is Collected?**

SSML may collect Personal Data from you as the Data Subject, when you provide your Personal Data through our website, while you are in contact with our staff or at any other stage in the course of business.

You may visit our website without revealing any information about yourself. You may however choose to provide us with Personal Data when you send an e-mail to us. In such instances, we will store the information that you provide us with and process it further as may be necessary for us to respond to and administer any request that you may make.

### **SSML Cookie Policy**

Our website also uses a technology called “cookies”. A “cookie” is a piece of software, which may be sent to your computer. Cookies enable us to collect information about how our website and services are being used and to manage them more efficiently. The information so gathered through cookies may include:

- the date and time when you access our website;
- the website pages that you view and any download that you may make through such pages;
- whether or not such viewing or download is successful;
- the Internet address of the website or the domain name of the computer from which you access our website;
- the operating system of the machine running your web browser; and the type and version of your web browser.

Should you wish to reject all, or certain cookies used by our website, you may modify your Web browser preferences to do so. If, however, you reject all cookies then you might be unable to use some of the services available on our website. Moreover, you may set your browser to notify you when you receive a cookie, giving you the opportunity to choose whether or not you wish to accept it. In this regard, it is important to note that if you do so, this may materially distort the quality of service and data you receive through our website.

If the product you are using has digital certificates/certificate signatures, then your name and related details may be displayed as part of any certificate issued to you. It will be seen by those to whom your certificate or signature is presented or who rely on it. Your details may also need to be entered into a related status directory of certificates issued.

### **How we use your Personal Data**

We use the Personal Data we collect to deliver the services which we provide. Other processing activities include communication with you, any service updates or marketing communication such as newsletters (if you have provided your consent).

The legal basis for the processing of your Personal Data may vary, but this would include the following:

- When the processing is necessary for the performance of a contract such as a services agreement;
- When the processing is necessary for our legitimate business interests, in the provision of the services you have engaged us to carry out;
- When the processing is necessary to promote safety and security as described in the ‘Security’ section below;
- When the processing is necessary to comply with any applicable legal obligation.
- Your explicit consent, which you may withdraw at any time by sending us an email or unsubscribing from marketing communications;

### **Providing Personal Data to Third Parties**

Please be aware that data sent through the internet may potentially, for reasons beyond our control that are solely of a technical nature, be transmitted across international borders even where sender and receiver of information are located in the same country.

Without prejudice to anything contained in this Privacy Policy, it is pertinent to point out that we are obliged to disclose personal data relating to you to any third party if such disclosure is necessary *inter alia* for the following purposes:

- for the purpose of preventing, detecting or suppressing fraud or any other criminal offence;
- where it is necessary as a matter of national or public security;
- in the interest of national budgetary, monetary or taxation matters that can arise;
- to protect and defend our rights and property or that of users of our website;
- to protect against abuse, misuse or unauthorised use of our website;
- to protect the personal safety or property of users of our website (e.g. if you provide false or deceptive information about yourself or attempt to pose as someone else, we shall disclose any information we may have about you in our possession so as to assist any type of investigation into your actions);
- for any purpose that may be necessary for the performance of any agreement you may have entered into with us; or
- as may be allowed or required by or under any law.

It is also important to highlight the fact that there may be instances where we may transfer your Personal Data to other service providers, acting as Data Processors, who process data for us, based on our instructions, and in compliance with this policy and any other appropriate confidentiality and security measures. Data Processors, who are engaged to assist us in attaining the purposes of processing listed in the 'How we use your Personal Data' section, include service providers which supply us with services, mainly relating to information technology.

We do not transfer your Personal Data to any third parties for marketing purposes.

### **Retention of Personal Data and the Right to be Forgotten**

We keep your Personal Data for as long as necessary for our legitimate business interests, for legal reasons and to prevent harm, including as described in the 'How we use your Personal Data' and 'Providing Personal Data to Third Parties' sections of this policy.

SSML acknowledges that you have a right to be forgotten. Therefore, no Personal Data that is processed while providing you with our services, or through our website will be kept longer than necessary for the purposes for which it is processed. Personal Data will only be kept for a period corresponding with our obligations of retention under relevant laws.

Personal Data pertaining to prospective candidates who apply for a job through our website and whose application is unsuccessful, such as documents relating to the recruitment and selection process (e.g. Job applications, CVs, correspondence, interview notes, referral letters, background and reference checks, etc.), will be retained for a period of 6 months from the date of receipt of application.

Should you wish all or any category of your Personal Data to be deleted, you may request this in writing at [info@security.com.mt](mailto:info@security.com.mt).

## **Privacy Compliance**

Our Privacy Policy is compliant with the General Data Protection Regulation (GDPR), any other EU data protection legislation and the Data Protection Act (Chapter 586 of the laws of Malta).

## **Security**

SSML engages all reasonable efforts for the purpose of safeguarding the confidentiality of all Personal Data that it processes and regularly reviews and enhances its technical, physical and managerial procedures so as to ensure that your personal data is protected from:

- unauthorised access,
- improper use or disclosure,
- unauthorised modification,
- unlawful destruction or accidental loss.

To this end we have implemented security policies, rules and technical measures dedicated to the protection of the Personal Data processed by us and that data that we have under our control. All our employees and third-party data processors who have access to and are associated with the processing of Personal Data, are further obliged to respect the confidentiality of our visitors' and clients' personal data.

By its very nature however the internet is not a secure medium and data sent via this medium can potentially be subject to unauthorised acts by third parties that are outside of our control. There can be no absolute guarantee in relation to the privacy or confidentiality of any information passing through our website. We shall accept no responsibility or liability whatsoever for the security of your data while in transit through the internet.

## **Third Party Websites**

No third party is permitted to link any other website to our website without obtaining our prior written consent.

## **How we Communicate with you**

We use your contact information when necessary, to provide you with our services. We may also use your contact information to keep you updated through our newsletters. You can limit or restrict the receipt of these communications via the "Unsubscribe" link in any marketing email.

All e-mail messages from SSML are sent in good faith. We cannot be held responsible for any modification that happens by any virus, or other third party after they have been sent. All messages are confidential and are intended for the recipient only. If you are not the intended recipient specifically identified as the addressee on it then you should delete the message and all its attachments and are prohibited from using, reading, disclosing to any person or otherwise acting on the information contained in it and/or its contents in any way and should also notify us as soon as possible of this fact.

## **Right to Access/ Questions**

You have a right to request access to and/or correction of your personal data processed by SSML. Any such request must be made in writing to SSML at the address indicated on the homepage of the website and must be signed by yourself as the Data Subject to whom the particular data relates. The processing of such requests sometimes attracts the imposition of a nominal fee.

## **Data Subject Rights**

The full list of Data Subject Rights:

- Right to access
- Right to be forgotten
- Right to rectification
- Right to restriction of processing
- Right to data portability
- Right to object
- Right to withdraw your consent
- Right to lodge a complaint with the Information and Data Protection Commissioner (IDPC)

## **Changes to the Privacy Policy**

This Privacy Policy may be modified at any given time, particularly where legal requirements, or where the interest of our users' security so require. Any such changes will be posted here so that you are always kept informed of how and why we process your Personal Data.

It is therefore in your own interest to check this Privacy Policy page from time to time so as to familiarise yourself with any changes. The date when this Policy was last updated is indicated at the end of this Policy.

## **Who we are and how to contact us**

SSML controls your Personal Data and provides you with the services you have agreed to. If you are seeking to exercise any of your rights, have any questions about SSML's privacy policy or the use of data in a particular service, please contact our Data Protection Officer at [info@security.com.mt](mailto:info@security.com.mt).

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