# **General Privacy Policy**



#### INFORMATION CONCERNING THE PROCESSING OF PERSONAL DATA

Pursuant to Article 13 of Regulation (EU) 2016/679 ("Regulation 2016/679") and the provisions of the law, when applicable, Eurpean Forensic Institute Ltd ("EFI") in its capacity as data controller, provides the following information to the User.

#### 1. COLLECTION OF PERSONAL DATA

Personal data relating to the user who is a natural or legal person (hereinafter, "Personal Data") and which are in the possession of EFI have been acquired directly from the User following the consent granted when accepting our privacy policy on our internet site and social media channels. The processing of personal data does not include special categories of personal data (such as sensitive data) as well as data relating to criminal convictions and offenses.

#### 2. PURPOSE AND LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

The purposes for which Personal Data acquired can be processed are exclusively linked to the performance of the following activities by EFI:

- a) purposes related to the delivery of education and training, including the communication of Personal Data to third parties for operational and organizational needs, which are related to the delivery of courses;
- b) compliance with legal or regulatory provisions, instructions issued by public authorities pursuant to applicable laws, by supervisory and control authorities;
- c) general administration purposes and activities, including market research and the promotion of new products and services.

## 3. PROCEDURES FOR THE PROCESSING OF PERSONAL DATA

Personal Data may be processed using manual, electronic and/or automated tools, for reasons strictly linked to the purposes set out in point 2 above and in compliance with the security and confidentiality of Personal Data at all times; for which a similar level of protection will be guaranteed if any new and innovative tools are introduced, which may lead to remote/electronic/further communications with clients.

# 4. CATEGORIES OF RECEIPIENTS TO WHOM PERSONAL DATA MAY BE DISCLOSED TO OR THAT MAY COME TO KNOWLEDGE AS QUALIFYING OR RESPONSIBLE PERSONS

Personal Data may be disclosed to third parties for the execution of, among others, marketing, advertising, IT services; legal, fiscal and financial consultancy and advisory services; postal and correspondence services by email; archiving services; disaster recovery services; and, more generally, for the execution of activities connected with or instrumental to the activity carried out by EFI. The recipients to whom Personal Data may be communicated to will in turn process the data received in their capacity as independent data controllers, in complete autonomy and in accordance with the provisions of Regulation 2016/679, as they are unrelated to the original treatment in place by the data controller or in their capacity as data controllers appointed pursuant to art. 28 of the 2016/679 Regulations. In addition, Personal Data may be brought to the attention of persons appointed by the data controller to carry out specific processing for the purposes described above, and in particular: (a) to employees designated as data processors; and (b) to suppliers designated as controllers. The complete list of the names of recipients to whom the Personal Data have been or may be communicated will be provided by the data controller to the data subject upon express written request.

#### NATURE OF CONSENT TO THE PROCESSING OF PERSONAL DATA AND EFFECTS OF REFUSAL TO GIVE CONSENT

The data subject may refuse to provide their Personal Data, except in cases where the processing is required by applicable laws. However, refusal to provide Personal Data or to consent to the related processing, if required, for the purposes indicated will result in:

- 1. For purposes indicated in points 2a) and 2b) above, the impossibility for EFI to deliver the course to the user;
- 2. For purposes indicated in point 2c) above, which require the consent of the data subject, the impossibility, on the part of the data subject, to benefit from better levels of service and to receive commercial information;

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in this case, the Personal Data requested are not strictly connected to the delivery of courses and the given consent may be revoked at any time, without any effect on the delivery of courses.

## 5. RETENTION PERIOD FOR PERSONAL DATA

Personal Data will be kept by the data controller for the duration of the education and training of the data subject and, subsequently, to comply with retention period imposed by legal provisions applicable to the data controller, including those for the conservation of academic and accounting records.

## 6. RIGHTS OF THE DATA SUBJECT

Regulation (EU) 2016/679 provides specific rights to the data subject, which can be exercised by means of a written request sent to the data controller. They include: the right to have confirmation of the existence of Personal Data of the data subject and, in this case, the right to know the information pursuant to art. 15 of Regulation 2016/679, including in particular the origin of Personal Data and the purposes of related processing, the right to know the categories of recipients to whom the Personal Data may be communicated to, or who may become aware of them, the envisaged period for which the personal data will be stored (right of access); the right to request cancellation (right to be forgotten) in the cases provided for by art. 17 of Regulation 2016/679, the transformation into anonymous form, the limitation of processing (in the cases provided for by Article 18 of Regulation 2016/679) or the blocking of Personal Data processed in violation of the law, as well as the updating, rectification or, when there is interest, the integration of Personal Data (pursuant to Article 16 of Regulation 2016/679), as well as the right to the portability of Personal Data, where applicable (pursuant to Article 20 of the 2016/679 Regulation); the right to object, for legitimate reasons, to the processing of Personal Data, as well as to the processing of Personal Data for commercial purposes (pursuant to Article 21 of Regulation 2016/679). In any case, the data subject may propose at any time to the data controller to assert their rights.

#### 7. DATA CONTROLLER

The data controller is European Forensic Institute Ltd. who can be contacted by writing to the following address:

Malta Life Sciences Park, Sir Temi Zammit Buildings, San Gwann SGN 3000, Malta

or by writing to the following e-mail address admin@eufor.eu.