

MACM MEMBERS AREA PRIVACY POLICY

OUR COMMITMENT TO YOU...

- ✓ *We will only use your data to improve your experience.*
- ✓ *We will protect your data like it's our own.*
- ✓ *You decide what and how you hear from us.*
- ✓ *If we don't need it, we'll delete it.*
- ✓ *Your privacy is our priority.*

Protecting Your Privacy

We, the team at MACM, strongly value our own privacy – and therefore are committed to protect your personal data (i.e. information that identifies you) as though it is our own.

If you have any questions about how we protect your privacy, get in touch here: privacy@macm.org.mt

One of your rights under EU law - the GDPR - is that you must be informed when your personal data - also known as personal information - is processed (collected, used, stored) by any organisation. You also have the right to know the details and purpose of that processing.

This privacy policy describes our practices relating to the personal data of visitors of the Members Area of www.macm.org.mt, available at <https://secure.macm.org.mt>, and make use of our online facilities. In this regard, the personal data concerns data subjects, identifiable natural individuals who are either representatives of Member corporate entities or who are Members themselves in the case of sole traders, for example. For all our services involving the processing of personal data, the data controller — the company that's responsible for your privacy — is MACM – Malta Association of Credit Management with its address at Mdina Bastions, Blk D Office 1, N/S in Mikielang Sapiano Street, Haz-Zebbug.

We assure you that we will only use and disclose any personal data collected from you in accordance with the manner set out in this policy.

Navigating this Privacy Policy (Contents)

- ▶ **Information we collect**
- ▶ **How & Why we use your information**
 - **Sharing Your Information**
- ▶ **Your rights**
- ▶ **Security of your Personal Data**
- ▶ **Changes to how we protect your privacy**
- ▶ **Links to Other Websites**
- ▶ **How to contact us**

► Information we collect

Most of the personal information which we may collect about you through this website is given to us only **if you choose** to give it to us.

Such personal information may be requested from you when you fill in a field (e.g. to fill in any other form with your questions and comments or any other form or application downloaded through or from MACM Website). If you send us emails, then the personal data we process will depend on what you send us in the email.

The information we collect from you normally includes the following:

1. Name and Surname;
2. Contact Details;
 - a. Email address
 - b. Telephone Number
3. Information about your device (phone or laptop) with which you accessed our website;

Check out the next sections to understand how and why we use this information.

► How & Why we use your information

We use your information in a number of different ways — what we do with it then depends on the information and the purpose for which we collected such information.

The tables below set this out in detail, showing what we do, and why we do it.

1. Your name, I.D. No and contact details

How we use your Name + I.D. No + contact details (email address)	Why?
To send you service messages by text, e-mail.	We've got to do this to perform our contract with you, administer your account with us as appropriate or to respond to your queries.
To send you information by email, SMS, or post, about our new services and events	To keep you up to date. We only send this with your permission as— and you can ask us to stop.
Fraud prevention and detection	To prevent and detect fraud against either you or us — unfortunate, but absolutely essential
Knowing what you, and other customers, like	To ensure we are giving you what you want, and to stay ahead of the competition

2. Your contact history with us

What you've said to us — for example, over email or contact forms.

How we use your contact history	Why?
Provide customer service and support	We've got to do this to perform our contract with you to your best satisfaction
Train our staff	For our team to remain up to scratch so that you get the best possible customer service.

3. Information about your device (phone or laptop) with which you accessed our website

Information you give us when you browse our site or use our app, including your IP address and device type and, if you choose to share it with us, your location data, as well as how you use our website and app.

How we use information about your phone or laptop, and how you use our website and app	Why?
Improve our website and set default options for you (such as language)	To give you the best possible customer service experience
Protect our website	To prevent and detect fraud against either you or us — and to meet our legal obligations about looking after your data

- You don't have to give us any of this personal information but if you don't, you may not be able to use our site or all of the services we offer on the site, and you are unlikely to receive an optimal customer experience.
- We also anonymise and aggregate personal information (so that it does not identify you) and use it for purposes including testing our IT systems, research, data analysis, improving our site, and developing new products and services. We also share this anonymised information with third parties – but don't worry, they cannot identify you.

The Legal Basis for Processing

- For some of the uses of your personal data (as described above) there is a legal basis under applicable data protection laws for us to use such personal data without having obtained your consent.

This includes, for example, where it is necessary for us to use the information to perform a contract with you or take steps at your request prior to entering into a contract with you, such as to process your order, provide customer-care and support services to you.

It also includes circumstances (such as we have described below) where we have a legitimate interest to use your data, provided that proper care is taken in relation to your rights and interests:

- (i) to ensure that you know about any changes to the website or the terms of this Privacy Policy.
- (ii) to ensure that we organise our databases efficiently and understand how our clients may make purchases or use our services;
- (iii) to carry out research and analysis of your data (including purchase information) as this helps us understand our clients/members better, who they are and how they interact with us;
- (iv) to improve and ensure the security of the website (for example, for statistical, testing and analytical purposes, troubleshooting).

Retention Periods

- We will hold on to your information for no longer than is necessary keeping in mind the purpose/s (or compatible purposes) for which we first collected the data.
- We may also keep hold of some of your information if it becomes necessary or required to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.
- As a guide:
 - we will keep personal data while your account with us is active (if you have an account) or until such time as you ask us to stop communications with you, unless we need to keep the data for longer;
 - we may keep certain categories of personal data for longer in order to meet any legal or regulatory requirements, or to resolve a legal dispute;

- and, we may keep different types of personal data for different lengths of time if required by law (for instance, we may need to keep certain personal data relating to purchases for about 10 years in order to comply with tax/VAT reporting requirements);

You may obtain more information as to the retention periods or the criteria used by us to determine the retention periods by contacting us here privacy@macm.org.mt

► Sharing your information

We do not, and will not, sell any of your personal data to any third party – including your name, address, email address or any other information. It is not our business to do so – and we want to earn your trust and confidence.

- However, we share your data with the following categories of companies as an essential part of being able to provide our services to you, as set out in this statement:
 - i. Other companies that are involved in the process of providing you with a service, such as intermediaries and service providers as may be required
 - ii. Professional service providers, such as marketing agencies, advertising partners and website hosts who service us in turn to operate our business.
 - iii. Credit reference agencies, law enforcement and fraud prevention agencies, so we can help tackle fraud.
- In most circumstances we will not disclose personal data without consent. However there may be occasions where we might have to – e.g. with a court order, to comply with legal requirements and satisfy a legal request, for the proper administration of justice, to protect your vital interests, to fulfil your requests, to safeguard the integrity of the relevant websites operated by us or by such related entities or subsidiaries, or in the event of a corporate sale, merger, reorganisation, dissolution or similar event involving us and/or our subsidiaries and related entities.
- When we do share data, we do so on an understanding with the other entities that the data is to be used only for the purposes for which we originally intended – again, we don't want you to have any surprises.
- We may also provide third parties with aggregated but anonymised information and analytics about our customers and, before we do so, we will make sure that it does not identify you. Anonymous information means it is anonymous.
- If we ever have to share data with entities that are outside of the EEA, we will be sure to do so in a manner that complies with the requirements established by the GDPR.

► Your rights

You enjoy several rights relating to your personal information:

(i) The right to be informed about how your personal information is being used;

We need to be clear with you about how we process your personal data. We do this through this Privacy Policy, which we will keep as up to date as possible.

(ii) The right to access the personal information we hold about you;

You can access the personal data we hold on you by contacting us on privacy@macm.org.mt.

To process your request, we will ask you to send us proof of identity so that we can be sure we are releasing your personal data to the right person.

We will carry out our best efforts to process your request within one month or, if the request is particularly complex, two months. We can provide you with a copy of your personal data in electronic format or hard copy.

If we consider the frequency of your requests as being unreasonable, we may refuse to comply with your request. In those circumstances, if you disagree, you can complain to the data protection authority – in Malta, the Information and Data Protection Commissioner.

(iii) The right to request the correction of inaccurate personal information we hold about you;

We appreciate feedback from you to ensure our records are accurate and up-to-date.

If you think that the information we hold about you is inaccurate or incomplete please ask us to correct it by contacting us on privacy@macm.org.mt.

(iv) The right to request that we delete your data, or stop processing it or collecting it;

You can ask us to delete your personal data; however, this is not an absolute right.

In spite of a request for erasure, we may be justified to keep personal data which we need to keep, e.g. (i) to comply with a legal obligation (for instance, we are required by personal data for VAT reporting purposes); and (ii) in relation to the exercise or defence of any legal claims.

When you ask us to delete your personal data, we assume that you do not want to hear from us again. To ensure that we do not send you any special offers in the future (for example, if we purchased your details from a third party list), we will retain just enough of your personal data solely for suppression purposes.

Other than as described above, we will always comply with your request and do so promptly. We would carry out our best efforts to notify any third parties with whom we have shared your personal data about your request so that they could also comply.

(v) The right to stop direct marketing messages;

- (vi) The right to object to certain processing based on legitimate interest;**
You have a right to object to our use of your personal information including where we use it for our legitimate interests or where we use your personal information to carry out profiling using automated means.
- (vii) The right to request human intervention if automated processing without human intervention is used to make decisions having legal or similar effects on you;**
- (viii) The right to withdraw consent for other consent-based processing at any time;**
- (ix) The right to request that we transfer or port elements of your data either to you or another service provider;**

You have the right to move, copy or transfer your personal data from one organisation to another. If you do wish to transfer your personal data we would be happy to help.

If you ask for a data transfer, we will give you a copy of your personal data in a structured, commonly used and machine-readable form (e.g. a CSV file format). We can provide the personal data to you directly or, if you request, to another organisation.

Please note that we are not required to adopt processing systems that are compatible with another organisation, so it may be that the recipient organisation cannot automatically use the personal data we provide.

When making a transfer request, it would be helpful if you can identify exactly what personal data you wish us to transfer.

- (x) The right to complain to your data protection regulator — in Malta – the Information and Data Protection Commissioner (IDPC)**

If you want to exercise your rights, have a complaint, or just have questions, please contact us on privacy@macm.org.mt.

Please appreciate that the rights must be exercised within some limitation – for example, if you ask us for information we can only give you what relates to you and not what relates to other persons. When we receive requests, we may also request that you identify yourself and provide documentation or information for verification (we would not want to disclose information to the wrong person). Unreasonable requests may be subjected to a reasonable fee or refusal to respond.

► Security of your Personal Data

Security of your personal data is very important to us.

Where it's appropriate, our website uses HTTPS to help keep information about you secure. However, no data transmission over the internet can be guaranteed to be totally secure.

You may complete a registration process when you sign up to use parts of the websites. This may include the creation of a username, password and/or other identification information. Any such details should be kept confidential by you and should not be disclosed to or shared with anyone.

Where you do disclose any of these details, you are solely responsible for all activities undertaken where they are used.

Whenever you create a password, then to protect your account you should choose a strong password, meaning it should be lengthy and include a mixture of letters and numbers with mix of CAPS.

We do our best to keep the information you disclose to us secure. However, we can't guarantee or warrant the security of any information which you send to us.

Security measures which have implemented to secure information transmitted over our website or stored on our systems include the following:

1. Use of secure servers;
2. Use of firewalls;
3. Use of encryption;
4. Physical access controls at data centres;
5. Information access controls;
6. Use of back-up systems;

Please understand, however, that no system is perfect or can guarantee that unauthorised access or theft will not occur.

► **Changes to how we protect your privacy**

Our website is continually under review – new functions and features are periodically added and improved to interface, thus changes to our privacy policy may be required from time to time.

We therefore encourage you to check our privacy policy on a frequent basis.

► **Links to Other Websites**

This privacy notice does not cover the links within this site linking to other websites which are not controlled by us. We are not responsible for the collection or use of your personal information from these third-party websites.

Therefore, we encourage you to read the privacy statements on the other websites you visit.

► **How to contact us**

We are always happy to hear from you, whether to make a suggestion but especially if you feel we can do better.

If you have any questions about this Privacy Policy, or if you wish to make a complaint about how we have handled your personal information, please contact us at:

MACM
Mdina Bastions
Blk D Office 1
N/S in Mikielang Sapiano Street
Haz-Zebbug

We have appointed a **Data Protection Lead** who may be contacted via email on privacy@macm.org.mt