

Policy for Recording and Archiving Data

The EAPTI-GPTIM protects the privacy of its students' education records in compliance with GDPR requirements and in particular Subsidiary Legislation 586.07 'Processing Of Personal Data (Education Sector) Regulations', in terms of Legal Notice 19 of 2015, as amended by Act XXVII of 2016. Access to student data is provided strictly within the parameters of the Act.

A. Types of Data

EAPTI-GPTIM holds the following categories of student information:

- Personal data including contact information; demographic data; and biometric, social welfare, medical and academic misconduct data where applicable;
- Enrolment data including students' entry/re-entry applications and related documentation, and participation rates of vulnerable groups;
- Financial data related to student payments and pending fees;
- Academic data related to course participation, retention and success rates, students' assessments, clinical placements, yearly and final transcripts, and graduation documentation;
- Research data related to the research carried out by students.
- Student feedback data including students' satisfaction with their courses.

Additionally, the EAPTI-GPTIM electronic system automatically gathers standard information about the person making use of EAPTI-GPTIM e-services. It also contains some connection information such as the page or service that was requested and the date and time of the request. This information is used for the sole purpose of statistical information gathering and demographics relating to the EAPTI-GPTIM website, and enables EAPTI-GPTIM to determine general visitor patterns and pathways within the website and to improve future visitors' experience.

EAPTI-GPTIM may also collect personal information supplied through the use of web-based forms and surveys. This information, including email addresses and contact numbers, will not be supplied to any third party. In submitting personal information online, students are deemed to be agreeing that EAPTI-GPTIM staff may use their details for the sole purpose of conducting the business of EAPTI-GPTIM, and are so informed in the web-based forms and surveys.

B. Processing Data

The Data Controller at EAPTI-GPTIM is its Director.

EAPTI-GPTIM may process personal data in relation to students, parents and legal guardians for administration purposes and for its daily operations and efficient running for the purpose of providing their students with the necessary educational services as required under the Education Act in fulfilment of its contractual commitment with students.

Personal data in relation to students may also be processed for the following purposes:

- academic progress monitoring which includes performance data, examination and assessment results associated with the students;
- organisation of functions and activities which may form part of curricular and extra-curricular requirements, provided that where the processing is related to informal activities the consent is obtained from the students themselves if applicable.

EAPTI-GPTIM shall request in writing permission from students to produce and make use of visual images that includes them. Unless otherwise stated, such images may only be used for the purposes of internal administration and for EAPTI-GPTIM publicity and publications.

With respect to information connected to electronic or card payments, EAPTI-GPTIM does not process information other than for the purposes of payment, strictly in line with the Data Information Act and relevant subsidiary legislation.

C. Accessing Data

EAPTI-GPTIM students have the right to access their own data in any one of these fields during their period of studies, including documentation related to course conclusion such as official transcript and degree certificate. After the conclusion of the course the available information can be accessed against a fee.

Biometric, social welfare, medical and academic misconduct data is destroyed on completion of studies. Contact information, entry data, financial data, research and student feedback data is retained securely for five years after the completion of studies. Aggregated demographic and academic data (participation, retention and success rates) as well as e-copies of official transcripts and degree certificates are retained for 50 years.

Access to data held by EAPTI-GPTIM by third parties both in Malta and abroad is strictly in line with Subsidiary Legislation 586.07, and against students' written permission unless otherwise indicated in the said legislation.

D. External Access

EAPTI-GPTIM shall allow access to its data by third parties strictly in accordance to Subsidiary Legislation 586.07, i.e. a) by government entities empowered to do so, and b) for academic research purposes following approval by the Data Protection Commissioner and granting of permission by the students whose data will be perused.

E. Data Management and Archiving

Student records will be stored securely by the EAPTI-GPTIM Director, and copied/archived regularly in paper and electronic form as applicable in a separate secure location at the Maltese official address of the entity. The Board is responsible for the analysis of data streams indicated in Section A of this Appendix. All documentary storage and all archiving will be carried out at the Maltese official address of the entity.

F. Right of Review

A student may request amendment of the content of an education record on the grounds that the record is inaccurate, misleading, or otherwise in violation of the privacy of the student. If EAPTI-GPTIM does not amend the record as requested, then the student may request a hearing in front of the Complaints and Appeals Board as per this EAPTI-GPTIM IQA Manual. No hearing under this policy shall be granted for challenging the underlying basis for a grade; however, the accuracy of the recording of the grade could be challenged.

G. Review of Policy

The EAPTI-GPTIM shall modify this Privacy Policy from time to time according to requirements. Students shall be alerted when the Policy is updated. Students and other third parties are invited to consult this Privacy Policy on the EAPTI-GPTIM website in order to become aware of any changes. The date when this Policy was last updated is indicated on the first page this Policy.