

This Privacy Policy is effective from 24/5/2018

Transport Malta (hereafter also referred to as 'the Authority') is concerned with protecting the privacy of any personal information that you may choose to provide to us ("Personal Information"). Transport Malta will attempt to ensure that its use of your Personal Information is compliant with the General Data Protection Regulation, ("GDPR"), (Regulation (EU) 2016/679). Accordingly, Transport Malta issues this policy to inform you of our use of your Personal Information.

1. Introduction

1.1 This Privacy Policy sets out the way in which the Transport Malta ("we" or "us"), a body corporate originally established by Act XV of 2009 entitled "Authority for Transport in Malta" with its main offices located at Malta Transport Centre, Triq Pantar, Hal Lija LJA2021, Malta, is operating www.transport.gov.mt and collects and processes Personal Information, as well as the steps we take to protect such information.

1.2 By utilising our Services, you acknowledge that you have read, and agree to, the terms of this Privacy Policy and that you consent to the use by the Authority of your Personal Information for the purposes set out in paragraph 3 of this Privacy Policy. If you do not wish to provide your Personal Information on the basis set out in this Privacy Policy, you should not enter the relevant information on the Website or provide your Personal Information to us otherwise. However, if you do not provide your Personal Information, you may not be able to use all of the Services.

1.3 Definitions:

1.4.1 "**You**" means the data subject who is using the services of <company>.

1.4.2 "**Personal Data**" means information that specifically identifies an individual or that is linked to information that identifies a specific individual.

1.4.3 "**Visitor**" means an individual other than a user, who uses the public area, but has no access to the restricted areas of the Site or Service

1.5 Principles:

This policy is based on the following data protection principles:

- 1.5.1 The processing of personal data shall take place in a lawful, fair and transparent way;
- 1.5.2 The collecting of personal data shall only be performed for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- 1.5.3 The collecting of personal data shall be adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed;
- 1.5.4 The personal data shall be accurate and where necessary, kept up to date;
- 1.5.5 Every reasonable step shall be taken to ensure that personal data that are inaccurate having regard to the purposes for which they are processed, are erased or rectified without delay;
- 1.5.6 Personal data shall be kept in a form which permits identification of the data subject for no longer than it is necessary for the purpose for which the personal data are processed;
- 1.5.7 All personal data shall be kept confidential and stored in a manner that ensures appropriate security;
- 1.5.8 Personal data shall not be shared with third parties except when necessary in order for them to provide services upon agreement;
- 1.5.9 Data subjects shall have the right to request access to and rectification or erasure of personal data, or restriction of processing, or to object to processing as well as the right of data portability.

2. The Information we collect:

2.1 As part of providing you with the Services, we collect your Personal Information when contacting us to lodge a complaint, query or information request to customer care. "Personal Information" means any information from which you can be personally identified, including your name, surname and email address.

2.2 We also collect your personal information when you register/subscribe to one or more of our newsletters wherein we request and collect your name, surname, email address, a password, fixed line telephone number, and full physical address. As optional, we also request your mobile number and your preference of interests for us to understand which newsletters to forward to you, once published.

2.3 When accessing our website, we may pick up and process your Internet Protocol (IP) address, and details of which version of web browser you used in order for us to understand how you use the site, using cookies and page tagging techniques.

2.4 The legal basis for processing this data is to perform a task in the public interest that is set out in law and is statute based.

3. How we will use your Personal Information

3.1 We will process your Personal Information in accordance with the GDPR and to provide you with the Services. We will process your Personal Information to enable us to:

- 3.1.1 improve the site by monitoring how you use it;
- 3.1.2 gather feedback to improve our services, for example through email alerts;
- 3.1.3 respond to any feedback you send us, if you've asked us;
- 3.1.4 receive and respond to your communications and requests;
- 3.1.5 send email alerts to users who request them (and thus have provided us with their consent);
- 3.1.6 allow you, the user, to access government services and make transactions;
- 3.1.7 provide you with information about local services if you want it.
- 3.1.8 Comply with our obligations under Applicable Laws
- 3.1.9 Prepare statistics relating to the use of the Services by you and other customers;
- 3.1.10 Provide you with information about, and support for, the Services, including changes to the Services, technical updates and changes to the Terms & Conditions (including this Privacy Policy);

3.2 If at any time you wish us to stop processing your Personal Information for the above purposes, then you must contact us and we will take the appropriate steps to stop doing so. You may contact us by sending an email to dataprotection.tm@transport.gov.mt or calling on +356 2591 4586.

3.3 To ensure a good quality of service we may monitor any communication you have with us whether in writing or by electronic mail ("recordings"). Any recordings remain the property of the Authority and will be used only for the purposes listed above.

3.4 In the event that the purposes for processing change, then we will notify you as soon as practicable and seek any additional consent that may be required.

4. Disclosing your Personal Information

4.1 Except as described in this Policy, we will not intentionally disclose the Personal Data that we collect or store on the Service to third parties without your prior explicit consent. We may disclose information to third parties in the following circumstances:

4.2 Any third party which can assist us in verifying the accuracy of your Personal Information, including financial institutions and credit reference agencies (a record of the search may be retained by such third party);

4.3 Any third party which assists us in monitoring use of the Services, including the detection and prevention of fraud and collusion for;

4.4 Any contractors or other advisers auditing any of our business processes or who have the need to access such information for the purpose of advising us;

4.5 Any law enforcement body which may have any reasonable requirement to access your Personal Information;

4.6 Any regulatory body or authorised entity which may have any reasonable requirement to access your Personal Information; and

4.7 If at any time you wish us to stop processing your Personal Information for the above purposes, then you must contact us and we will take the appropriate steps to stop doing so. You may contact us sending an email to dataprotection.tm@transport.gov.mt or calling on +356 2591 4586.

5. Data Subject Rights

5.1 We respect your privacy rights and provide you with reasonable access to the Personal Data that you may have provided through your use of the Services. Your principal rights under the GDPR are:

- a. the right for information;
- b. the right to access;
- c. the right to rectification;
- d. the right to erasure;
- e. the right to restrict processing;
- f. the right to object to processing;
- g. the right to data portability;
- h. the right to complain to a supervisory authority; and
- i. the right to withdraw consent.

5.2 If you wish to access or amend any other Personal Data we hold about you, or to request that we delete any information about you, you may contact us by contacting the Authority's Data Protection Officer. We will acknowledge your request within seventy-two (72) hours and handle it promptly. The Authority will respond to these requests within a month, with a possibility to extend this period for particularly complex requests in accordance with Applicable Law. We will retain your information for as long as your account is active, as needed to provide you services, or to comply with our legal obligations, resolve disputes and enforce our agreements.

5.3 You may update, correct, or delete your Account information and preferences at any time by sending a request to the Authority's Data Protection Officer. Please note that any requested change you make will be reflected in active user databases instantly or within a reasonable period of time from the moment the request has been fully processed, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

5.4 You may decline to share certain Personal Data with us, in which case we may not be able to provide to you some or all of the features and functionality of the Service.

5.5 At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law.

5.6 In accordance with Applicable Law, we reserve the right to withhold personal data if disclosing it would adversely affect the rights and freedoms of others. Moreover, we reserve the right to charge a fee for complying with such requests if they are deemed manifestly unfounded or excessive. The Authority may charge a reasonable administrative-cost fee if further copies are requested.

6. Contacting us

6.1 For full details about Transport Malta and where it operates please contact us on +356 2591 0000.

6.2 If at any time you believe that we have not adhered to this Privacy Policy, please contact us on dataprotection.tn@transport.gov.mt or +356 2591 4586 and we will seek to promptly determine and correct the problem.

7. Advertising and use of Cookies

7.1 We may collect anonymous information about your use of the Website using "cookies", pixel tags and similar functionality. A "cookie" is a small file of text which is downloaded onto your computer when you access the Website and it allows us to recognise when you come back to the Website. We use cookies for the operation of the Website, including (for example) to allow you to remain logged in as you move between different parts of the Website. We also use cookies for our own analytical purposes so that we can identify where customers have encountered technical problems on the Website, and therefore help us improve our customers' experience.

7.2 If you object to cookies or want to delete any cookies that are already stored on your computer, you should follow the instructions for deleting existing cookies and disabling future cookies on your web browser or equivalent software. Further information is available at www.aboutcookies.org. Please note that by deleting or disabling cookies you may not be able to access certain areas or features of the Website.

7.3 As part of the Website's operation, and for our own statistical analysis of site traffic, our Website automatically logs internet IP addresses. We do not log any e-mail address of visitors to the Website. Our advertising system logs IP addresses to supply more accurate advertising features, such as language-specific banners.

7.4 While the Website may contain links to websites operated by parties other than us, we are not responsible for the privacy practices or content of such websites.

8. Security

8.1 We take appropriate security measures to protect against loss, misuse and unauthorized access, alteration, disclosure, or destruction of your information. <company> has taken steps to ensure the ongoing confidentiality, integrity, availability, and resilience of systems and services processing personal information, and will restore the availability and access to information in a timely manner in the event of a physical or technical incident.

8.3 No method of transmission over the Internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the Service, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or organisational safeguards. If you believe your Personal Data has been compromised, please contact the Authority's Data Protection Officer.

8.4 If we learn of a security systems breach, we will inform you of the occurrence of the breach in accordance with applicable law.

9. Privacy Settings

9.1 Although we may allow you to adjust your privacy settings to limit access to certain Personal Data, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users with whom you may choose to share your information. We cannot and do not guarantee that information you post on or transmit to the Service will not be viewed by unauthorized persons. We have taken the necessary steps to protect as much as possible your Personal Information in transit by utilising HTTPS on our Website and TLS 1.2 (a strong protocol), ECDHE_RSA with P-256 (a strong key exchange), and AES_128_GCM (a strong cipher).

10. Data Retention

10.1 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. The data may also be retained beyond that specific purpose so that we can continue to improve your experience with us.

10.2 We only retain the Personal Data collected from you for as long as you choose to remain subscribed to the services for which you initially consented to or otherwise for a limited period of time as long as we need it to fulfill the purposes for which we have initially collected it, unless otherwise required by law, including that to resolve disputes.

10.3 we will actively review the Personal Data we handle, process and store, and will delete it or anonymise it in a secure manner when there is no longer a legal, business or customer need for it to be retained. Nevertheless, if you stop interacting with us as a customer, we will remove or anonymise your Personal Data after a period of 7 years.

11. International Transfers

11.1 The information you provide to us may be transferred to and stored in countries outside of the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for one of our suppliers or third-party processors. A transfer of your personal data may happen if any of our servers are located in a country outside of the EEA or one of our service providers is located in a country outside of the EEA. We may need to transfer your data in this way to carry out our service with you, to fulfil a legal obligation, to protect the public interest and/or for our legitimate interests. Nevertheless, if we do transfer or store your personal data outside the EEA in this way, we will take the necessary steps with the aim of ensuring that your privacy rights continue to be protected, as outlined in this Privacy Policy and in accordance with the GDPR and other applicable laws.

12. Data Protection Officer

12.1 Transport Malta has appointed a Data Protection Officer (“DPO”) who is responsible for matters relating to privacy and data protection. The Authority’s DPO can be reached by sending an email at dataprotection.tm@transport.gov.mt or by phoning on +356 2591 4586.

13. Changes to this Privacy Policy

13.1 Please note that this Privacy Policy may change from time to time. If we change this Privacy Policy in ways that affect how we use your Personal Information, we will advise you of the choices you may have as a result of those changes. We will also post a notice that this Privacy Policy has changed.