



Malta Association of
Physiotherapists

MAP Privacy Policy

Introduction

MAP takes Data protection very seriously and ensures that personal data is protected through processes that are by design targeted at keeping personal data safe.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR). By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

Data Controller

As the controller, MAP has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed.

The Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

The senior Vice President, The Professional Center, Sliema Road, Gzira, GZR1633, Malta.

What data do we collect and why do we store and process your Personal Data?

MAP collects a series of general data and information when a data subject either becomes a member by coming physically to our premises or events or through other communication channels. This data and information is stored securely either on one of the association's computers. Generally, when a data subject joins our association, we collect the following: Name & Surname, Address, Telephone and Mobile numbers, and preferred e-mail address.

When using our website we may collect the above personal details as well. Our web hosting provider as well as access portals to Physiopedia+ may also collect data through their server logs such as (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (referrer), (4) the date and time of access to the Internet site, (5) an Internet protocol address (IP address), (6) the Internet service provider of the accessing system, and (7) any other similar data. We will provide links to these respective organisations' privacy policies soon.



Malta Association of
Physiotherapists

The data collected is never used by MAP to draw any conclusions about the data subject. Rather, this information is needed to help us deliver the level of service that we feel our members deserve. We use this data to be able to contact our members and also to offer them new services and offers from time to time. Subscription to these offers and services will require separate consent from our members. Offers may be sent to data subjects through various channels such as: Email Marketing and printed material by post.

Where we are obliged to process your personal data in fulfilment of a legal requirement to which we are subject, or in pursuance of performing an obligation under a contract which we have with you, and you fail to provide us with that data, we may not be able to perform the Services as agreed upon.

Who collects personal data?

Data is collected by

- By our representatives through physical contact;
- Through our website;
- Through emails from our representatives;
- Through phone calls;
- Through postal mail;

Retention Period

We usually retain the personal data of our members for the period during which they are considered as members or are in a position to renew their membership without submitting a fresh application. As part of the services we offer, we include periodic services as part of a structured courses or programmes, sometimes offered by or in collaboration with, third parties. In this case MAP will retain the data throughout the period of the programme.

As a policy, MAP shall retain all personal data for two years and Professional Indemnity (PI) data ten years from the date of the last membership renewal. After this period, the data is erased or destroyed unless asked to do otherwise by the data subject. In order for members to be covered by the PI MAP subscribes to, at present they are required to be members of MAP. In the present agreement with our PI provider, the association keeps all forms and details and supplies the PI provider with Name, I.D.



Malta Association of
Physiotherapists

card number and on request scans of or the original declaration forms. PI information is considered to be active for 10 years, therefore MAP have based the 10-year retention period on this factor.

In the case of communications, we ask for specific permission from the data subject to retain their email address and/or phone number indefinitely. The data subject is reminded continuously in every mail shot that they may opt out whenever they like of these communications.

Who we share your data with

MAP may use third party partners to help in processing data for purposes such as ICT, logistics, accounting and auditing. We are assured that our partners handle personal data under the strictest controls. We also purposely share only the data that is required for the processing task rather than all the personal data about a data subject.

MAP may, disclose and divulge your personal data, where disclosure is requested by public authorities in accordance with a legal obligation, such as law enforcement authorities, provided that the personal data which is requested is necessary by the said public authority to carry out a particular inquiry in the general interest, in accordance with European Union or Member State law. We may also have to disclose your membership status and/or full PI information, should it be requested, by the PI provider. Your membership status may be requested by third party companies or organisations with whom we may be collaborating and you participating projects or courses by said third parties. We may also disclose your data if we are under a legal obligation to do so, in pursuance of a judgment or court order, or protect our rights.

Subscription to our newsletter

Data subjects are given the opportunity to subscribe to our newsletter and mail-shot notifications or adverts by our sponsors or advertisers. MAP uses these channels to inform its members about association events and other events that are of relevant interest to its members. The newsletter and mailshots which may contain advertisements may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) if the data subject is a client and gives MAP consent (Opts in). A confirmation e-mail will be sent to the e-mail address when a user subscribes. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

During the opt-in procedure, we also store the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.



Malta Association of
Physiotherapists

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter.

Photography and Videography of our members

Members attending MAP events may be in shot when such events are being recorded officially through photographs and videos. The recorded material will only be used to report these events in the Association's newsletter, website and social media and other media channels as the need may be. Members who for any reason do not wish to be included in this material should inform the association's executive committee of this and they will endeavour to accommodate their wishes.

Data Security

The processing of your data will be processed in accordance with the provision of the GDPR. MAP takes appropriate precautions to preserve your rights and prevent any corruption, loss, damage or destruction of your personal data. The association has appropriate security arrangements, including, where appropriate, limited physical access, administrative, procedural, and information ICT measures to prevent unauthorised or accidental access, collection, use, disclosure, copying, modification, disposal or destruction of personal data. In case our systems are compromised and suffer a data breach where the personal data of our members is exposed, MAP will promptly inform the data subject and the Office of the Data Protection Commissioner.

MAP's representatives may access personal data strictly on a "need to use" basis for the performance of their duties. MAP representatives are aware of the confidential nature of personal data and how they should handle it in strictest confidence.

How to contact us

You can contact us as follows:

Malta Association of Physiotherapists

Address: The Professional Centre

Sliema Road

Gzira

Malta

GZR 1633

Secretariat: [\(+356\) 21312417](tel:+35621312417)



Malta Association of
Physiotherapists

Routine erasure and blocking of personal data

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data is erased in accordance with legal requirements.

You rights as a data subject

As a data subject GDPR provides you with extensive rights as follows:

- **Right of confirmation**
- **Right of access**
- **Right to rectification**
- **Right to erasure (Right to be forgotten)**
- **Right of restriction of processing**
- **Right to data portability**
- **Right to object**
- **Automated individual decision-making, including profiling**
- **Right to withdraw data protection consent**
- **Data protection for applications and the application procedures**

Our Privacy Policy may change from time to time and any changes to the statement will be communicated to you by way of an e-mail or a notice on our website, with the option to opt-out at any time should you request it.