

PRIVACY POLICY

The **Malta Paralympic Committee ("MPC")** whose office is situated at Malta Council for the Voluntary Sector Volunteer Centre, 181, Melita Street, Valletta, VLT 1129, Malta., and is registered as a voluntary organisation with the Commissioner for Voluntary Organisations in Malta with registration number VO/1616, commit ourselves to guarantee the protection of personal data lawfully and in a transparent way and in line with the Data Protection Act, Cap. 586 of the laws of Malta (the **"DPA"**) and/or the EU General Data Protection (Regulation (EU) 2016/679) (the **"GDPR"** or the **"Regulation"**).

The data controller of this website, <https://www.paralympic.mt/> (the **"Website"**) is the MPC. The data subject may contact the MPC at info@paralympic.mt.

Purpose of this policy

This privacy policy describes how MPC collects, uses, and processes your personal data when you use our Website, including any data you may provide via the Website. This privacy policy is independent from MPC's offline personal data collection practices.

It is important that you read this privacy policy, together with any other privacy notice or processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your personal data. This privacy policy supplements any other notices and is not intended to override them.

Notification of changes to this policy

MPC is continually improving and adding new functionality and features to its and improving and adding to our existing products, services, and programs. Because of these ongoing changes, changes in the law, and the changing nature of technology, MPC's data practices are subject to change. MPC may update the privacy policy on its Website and will do its best to notify you of these updates via a prominent notice on its Website, however, you should rely on the version available on the Website which will be the most recent version.

The data we collect

The term "personal data" refers to personally identifiable information about you, such as your name, birth date, e-mail address or mailing address, and any other information that is identified with you personally. It does not include data where the identity has been removed ("anonymous data").

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your family and given names, nationality, date of birth, country and/or region of birth, city of birth, gender, photograph, identity documents details (type, number, place of issue, local name, date of issue, date of expiry).
- **Contact Data** includes your postal address, email address, phone number, social media accounts or similar information.
- **Health Data** includes information about your height and weight, information about your disability and any other information related to your physical health (if you are a participant whose sports and/or activity necessitate such information).
- **Sports Data** includes information you provide that relates to your participation in sports and activities, such as your sporting interests, classification details, competition results, training information, and preferences relevant to events or programmes organised by MPC.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

In addition to the above personal data you provide when you use our Website, MPC may also use technology to collect anonymous data about the use of our Website. For example, we may use technology to track how many visitors access our Website, the date and time of their visit, the length of their stay, and which pages they view. We may also use technology to determine which web browsers our visitors use and the address from which they accessed our Website (for example, if they connected to our Website by clicking on one of our banner ads). This technology does not identify you personally. It simply enables us to compile statistics about our visitors and their use of our Website. MPC may use this anonymous data and share it with third parties to improve the content and functionality of our Website, to better understand our customers and markets, and to improve our products and services.

Our Website also uses only session cookies which are erased when the user closes the Web browser. Cookies are small pieces of data that the site transfers to the user's computer hard drive when the user visits the website. The session cookie is stored in temporary memory and is not retained after the browser is closed. Session cookies do not collect information from the user's computer. They will typically store information in the form of a session identification that does not personally identify the user.

How we collect your personal data

MPC may collect personal data that you voluntarily give us when you use our Website e.g.

- by completing a contact or registration form
- by subscribing to any communications or publications we issue

Purposes for which we will use your personal data

Purpose/Activity	Type of data	Lawful basis for processing
To contact you in relation to your query and/or to set up introductory meetings with you, and maintaining ongoing contact thereafter, with MPC or other third-parties such as sports clubs, coaches or other sport personnel	(a) Identity; and (b) Contact.	(a) Data subject has given consent to the processing of their personal data for the purposes of replying to their query and/or setting up an introductory meeting
To maintain a database of contacts	(a) Identity; (b) Contact; (c) Health; (d) Sports; and (e) Marketing and Communications.	(a) Necessary for our legitimate interests (to identify the data subjects, to keep our records up to date)
		(b) Processing by a not-for-profit body in the sports industry, limited to members, former members of the body or to persons who have regular contact with the body in connection with its purposes as the national governing body for Para Sports

To manage our relationship with you, including: (a) To disseminate communications, updates, promotional materials, general marketing events or other information to you. Each such communication will include a clear option to withdraw your consent and unsubscribe from further communications. (b) To provide you with entry into sport events, activities or competitions or similar purposes	(a) Identity; (b) Contact; (c) Health; (d) Sports; and (e) Marketing and Communications.	(a) Data subject has given consent to the processing of their personal data for the purposes of marketing and communications (b) Necessary for our legitimate interests (to run our body, manage events, and inform our strategy) (c) Processing by a not-for-profit body in the sports industry, limited to members, former members of the body or to persons who have regular contact with the body in connection with its purposes as the national governing body for Para Sports
To use your data for educational, statistical and research purposes	(a) Identity; (b) Contact; (c) Health; (d) Sports; and (e) Marketing and Communications.	(a) Data subject has given consent to the processing of their personal data for the purposes of educational, statistical and research purposes (b) Necessary for our legitimate interests (to advance our goals as a sporting body) (c) Processing by a not-for-profit body in the sports industry, limited to members, former members of the body or to persons who have regular contact with the body in connection with its purposes as the national governing body for Para Sports
To use your health data in case health services or emergency health services are required	(a) Identity; (b) Contact; and (c) Health;	(a) Necessary in order to protect the vital interests of the data subject (b) Processing by a not-for-profit body in the sports industry, limited to members, former members of the body or to persons who have regular contact with the body in connection with its purposes as the national governing body for Para Sports

We will only use your personal data for the purposes we have collected it or purposes which are compatible. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so or, alternatively, request your consent.

Additionally, we may use your personal data where it is necessary for our legitimate interests (or those of a third party), provided that your interests and fundamental rights do not override those interests.

The processing of data for each of the above purposes may be carried out using paper-based or electronic means, via ordinary mail or by email, via telephone, and via any other IT channel.

Requirements and criteria for processing

As a data controller, MPC ensures that it shall process your personal data in accordance with its obligations in terms of the applicable data protection legislation and subsidiary legislation thereto., including but not limited to the DPA and GDPR

Disclosure of your personal data

MPC may share your personal data with service providers (including our web hosting provider) who act as data processors and process your data only on our instructions and in accordance with the applicable data protection legislation and subsidiary legislation thereto, including but not limited to the DPA and GDPR. Health data cannot be disclosed outside MPC without your explicit consent and MPC will not disclose such Health Data without your explicit consent.

In cases where the data is transferred outside the EEA, the company will take all appropriate contractual measures necessary and appropriate in order to ensure adequate levels of data protection. These measures may include:

- Transfers on the basis of Adequacy Decisions issued by the European Commission.
- Transfers on the basis of agreements based on standard contractual clauses for the transfer of data outside the EEA, as approved by the European Commission, among other methods.

Please contact us at info@paralympic.mt if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

In addition, there may be limited circumstances in which MPC may share or transfer personal data, for example, to comply with a legal obligation, a judgment, or an order of a court, tribunal, or authority , or in the event of a reorganization or similar event.

Links to third-party websites

This privacy policy applies only to MPC's Website.

MPC's Website may contain hyperlinks to third-party websites that are not operated by MPC. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of these third-party websites or any association with their operators. Clicking on those hyperlinks may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices. We urge you to review the privacy policy posted on any website you visit before using the website or providing any personal data about yourself.

Retention of personal data

Generally, our retention of your personal data shall not be kept for longer than is necessary, for the purposes for which the personal data are processed:

- Identity and Contact Data shall be retained for the duration of your involvement in the MPC, followed by two additional years.
- Health Data shall be retained for the duration of your involvement in the MPC, followed by one additional year.
- Sports Data used for historical and statistical purposes shall be retained permanently. Sports Data not used for historical and statistical purposes shall be retained for the duration of your involvement in the MPC, followed by two additional years.

- Marketing and Communications Data shall be retained until you withdraw your consent or unsubscribe from further communications.

Rights of data subject

As a data subject, you have the following rights:

1. the right of access, i.e. the right to obtain confirmation from the MCP as to whether or not personal data concerning him or her are being processed, and where this is the case, to obtain access thereto;
2. the right to rectification and erasure, i.e. the right to have inaccurate data rectified and/or to have incomplete data completed, and the right to have personal data erased for legitimate reasons;
3. the right to impose restrictions on the processing of personal data, i.e. the right to request the suspension of data processing for legitimate reasons;
4. the right to data portability, i.e. the right to receive the data in a structured, commonly-used and easily readable format, as well as the right to transmit the data to another data controller;
5. the right to object, i.e. the right to oppose the processing of data where legitimate reasons for this exist, including data processed for marketing and profiling purposes, if this is envisaged;
6. the right to withdraw consent, i.e. where you have given your consent to the processing of your personal data, you may withdraw this consent by contacting us.
7. the right to contact the competent data protection authority in case of unlawful data processing. In the case of Malta, this is the Information and Data Protection Commissioner ("IDPC") (<https://idpc.org.mt>). We would, however, appreciate the opportunity to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

You may exercise your rights regarding the data held about you by MPC, by submitting your request in writing to us. Provided that such requests are made at reasonable intervals. The data subject may exercise the rights listed above by writing to the MPC at: info@paralympic.mt.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Governing law

This privacy policy is governed by and construed in accordance with the laws of the Republic of Malta and relevant EU legislation.

Questions about our privacy policy

If you have any questions about this privacy policy or concerns about the way MPC processes your personal data, please contact us at: info@paralympic.mt.

Intellectual property

The content found on this Website is the property of MPC or of the entities referred to therein (including in particular the 'International Paralympic Committee' or 'IPC') and is protected by copyright. It may be displayed, re-formatted and printed for your personal, non-commercial use only. You may not copy, transmit, amend, reproduce or redistribute in any form whatsoever information contained on this Website without the prior written consent from MPC. Authorisation to reproduce material from websites linked to this Website must be obtained from the copyright-holder concerned. If you have any questions regarding our Website terms of use, please feel free to contact us by clicking here.