

La Valette Competition Privacy Policy

Last updated on the 30th of October 2018

Any capitalized terms used in this Privacy Policy are to be attributed the same meaning attributed thereto under the La Valette Competition (the "Competition") Terms and Conditions, unless otherwise defined herein.

This Privacy Policy applies to the processing of personal data carried out for the purposes of the Competition.

The Organiser is Malta International Airport p.l.c., a company registered in Malta, bearing company registration number C12663 and having its registered address at Malta International Airport, Luqa, Malta ("**We**" / "**Us**" / "**Our**").

We are committed to respecting your privacy.

If you wish to contact Us about Our privacy practices please feel free to do so by post at the abovementioned address or by email at info@maltairport.com.

Our Data Protection Officer is Mr Thomas Wohlfahrtstatter who can be contacted either at Our above mentioned address or by email at dataprotection@maltairport.com.

Please read this Privacy Policy carefully to understand our practices with respect to your personal data.

1. Updates

We may update this Privacy Policy in Our sole discretion including as result of a change in applicable law or processing activities. Any such changes will be communicated to you prior to the commencement of the relevant processing activity.

2. What amounts to personal data?

The term "personal data" refers to all personally identifiable information about you, such as your name, surname and address, and includes all information which may arise that can be identified with you personally such as all information you have provided Us in the relevant form that you have submitted for participation in the Competition.

3. How do we collect personal data?

Your personal data will be typically exclusively collected from the relevant form that you submit to Us in order to participate in the Competition.

If you are the winner, you may also supply to Us your personal data in correspondence or communications. If you are the traveling companion of a winner of the Competition, you and/or the winner may also supply personal data about you to Us.

4. What personal data do we process?

The personal data we collect and process for the purposes of participating in the Competition are the data you have provided Us in the relevant form that you have submitted for the purposes of participating in the Competition.

If you are the winner or a travelling companion, other personal data may need to be processed in order to award you the prize on an as the need arises basis. Prior to Our undertaking of the relevant processing activity, We will request provision of such personal data from the winner.

5. How do we use your personal data?

We will process the personal data you have provided Us in order to participate in the Competition exclusively for the purposes required for fulfilment of the Competition, including any purposes that are inherently related thereto.

The winner's and travelling companion's personal data will also be processed for the purposes of awarding the prize.

6. Legal Bases of Processing Personal Data

We typically process your personal data on the basis of the contractual relationship established with you through your acceptance of the La Valette Competition Terms and Conditions, available above and the submission of the relevant form for participating in the Competition.

Processing on the basis of your explicit consent is also envisaged if you are the winner or his traveling companion.

On the basis of Our legitimate interests, We may also process your personal data for the purposes of establishing, exercising or defending legal proceedings.

7. Recipients

Recipient of your personal data are:

- selected individuals within Our company, on a need-to-know basis;
- any service providers that may have access to your personal data in rendering Us with services necessary for the Competition; and
- third parties to whom disclosure may be required as a result of the Competition or the prize, such as Turkish Airlines;
- third parties involved in the organisation of the Competition;
- any third parties to whom you may have requested that we transfer your personal data; and
- third parties to whom disclosure may be required as a result of legal obligations imposed on Us.

Unless specifically instructed and consented by you, we do not share your personal data with any entity located outside of the EU or EEA.

8. Automated Decision-Making and Profiling

Your personal data will not be used for any decision solely taken on the basis of automated decision-making processes, including profiling, without human intervention.

9. Data Retention

We retain your personal data exclusively for the period which is lawfully permissible to retain your personal data. Thereafter, your personal data shall be immediately and irrevocably destroyed.

Since we have a contractual relationship with you, We may retain your personal data for up to five (5) years from the end of the Competition on the basis of Our legitimate interests to protect ourselves from civil cases which you might institute against Us in relation to the Competition.

Any personal data which we may hold on the basis of your consent shall be retained exclusively until when you withdraw your consent. As noted above, retention of data on the basis of your consent is only envisaged in case you are a winner of the Competition.

10. Your Rights

For as long as We retain your personal data, you have certain rights in relation to your personal data including:

- *Right of access* – you have the right to ascertain the personal data We hold about you and to receive a copy of such personal data;
- *Right to complain* – you have the right to lodge a complaint regarding the processing of your personal data with the supervisory authority for data protection matters. In Malta this is the Information and Data Protection Commissioner (contact details provided below);
- *Right to Erasure* – in certain circumstances you may request that We delete the personal data that we hold about you;
- *Right to Object* – you have a right to object and request that We cease the processing of your personal data where We rely on Our, or a third party's legitimate interest for processing your personal data;
- *Right to Portability* – you may request that We provide you with certain personal data which you have provided to Us in a structured, commonly used and machine-readable format. Where technically feasible, you may also request that we transmit such personal data to a third party controller indicated by you;
- *Right to Rectification* – you have the right to update or correct any inaccurate personal data which We hold about you;
- *Right to Restriction* – you have the right to request that We stop using your personal data in certain circumstances, including if you believe that We are unlawfully processing your personal data or the personal data that We hold about you is inaccurate;
- *Right to withdraw your consent* – where Our processing is based on your consent, you have the right to withdraw your consent. Withdrawal of your consent shall not affect the lawfulness of the processing based on your consent prior to the withdrawal of your consent; and

- *Right to be informed of the source* – where the personal data We hold about you was not provided to Us directly by you, you may also have the right to be informed of the source from which your personal data originates.

Please note that in terms of the applicable laws, your rights in relation to your personal data are not absolute.

You may exercise the rights indicated in this section by contacting Us or Our Data Protection Officer at the details indicated above.

11. Keeping you data secure

We shall keep your personal data secure and shall commit to take appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing, including against accidental loss, destruction, storage or access. Your personal data may be stored in paper files or electronically on our technology systems or on technology systems of our IT service providers.

12. Complaints

If you have any complaints regarding Our processing of your personal data, please note that you may contact Us or Our Data Protection Officer at the details indicated above. You also have a right to lodge a complaint with the Office of the Information and data Protection Commissioner in Malta (www.idpc.gov.mt).