



Data Collection and Processing Policy

V1.0

Purpose

This policy outlines how ESSI Academy collects, uses, stores, and protects personal data in line with the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Data Protection Act (Chapter 586 of the Laws of Malta). As an educational institution, ESSI Academy is committed to ensuring that the personal information of students, parents/guardians, staff, and partners is handled responsibly, securely, and transparently.

Scope

This policy applies to all personal data processed by ESSI Academy, whether in digital or paper form. It covers all academic, administrative, and operational functions, and applies to all staff members, educators, administrators, contractors, and third parties working with or on behalf of the Academy.

GDPR Compliance

ESSI Academy adheres to the following key data protection principles:

- We process data lawfully, fairly, and transparently. Individuals are informed of the purpose of data collection.
- Data is collected for specific, legitimate purposes relevant to educational or administrative functions.
- Only the minimum necessary data is collected and retained.
- We ensure that personal data is accurate and kept up to date.
- Data is not stored for longer than necessary.
- Appropriate technical and organisational measures are in place to keep data secure.
- We document our processing activities and can demonstrate compliance.

Data Subject Rights

All individuals whose personal data is held by the Academy (data subjects) have the following rights:

- The right to be informed about how their data is being used
- The right of access to their personal data
- The right to request correction of inaccurate data
- The right to request deletion of data (where applicable)
- The right to restrict how data is used
- The right to data portability (where applicable)

- The right to object to certain uses of their data
- Rights related to automated decision-making and profiling (not currently used by the Academy)

To exercise any of these rights, individuals may contact the Academy's Data Protection Officer at dpo@essi.mt.

Legal Basis for Processing

ESSI Academy processes personal data based on one or more of the following legal grounds:

- The individual (or their parent/guardian) has given explicit consent
- Processing is necessary for the fulfilment of our educational and contractual obligations
- The Academy must comply with a legal obligation
- To protect the vital interests of the student or another person
- Processing is necessary for the Academy's legitimate interests, provided these do not override the individual's rights

Data Collection Practices

ESSI Academy collects and processes a range of personal data for educational, administrative, and operational purposes. Examples include:

- Student information such as enrolment forms, academic records, attendance, and assessments
- Parent/guardian/next of kin contact information for communication and emergency contact
- Staff details for payroll, employment, and performance
- Learning management systems and school communications platforms
- Surveys and feedback forms, always conducted with transparency and, where applicable, informed consent

Data Storage, Access and Security

All personal data is stored securely in password-protected systems or in locked cabinets. Only authorised personnel have access to this data. Our security measures include:

- Role-based access control
- Use of encrypted digital platforms

- Regular data backups and secure storage solutions
- Staff training on data protection and safe data handling

Data Retention

We retain personal data only for as long as necessary for its intended purpose or as required by law. A data retention schedule guides how long student records, financial data, staff files, and other documentation are kept before secure disposal.

Third-Party Processors and Data Transfers

Where ESSI Academy works with third-party service providers (e.g. online learning tools, administrative software), we ensure these providers:

- Are GDPR-compliant
- Have a Processing Agreement (DPA)
- Do not transfer data outside the European Union unless suitable safeguards are in place

Reporting of Breaches

Any personal data breach must be reported immediately to the Data Protection Officer. If the breach poses a risk to individuals' rights or freedoms, it will be reported to the Office of the Information and Data Protection Commissioner (IDPC) within 72 hours. Affected individuals will be notified promptly if necessary. All incidents are documented, and follow-up actions are taken to prevent recurrence.

Roles and Responsibilities

The Data Protection Officer (DPO) is responsible for overseeing compliance, handling requests, and providing guidance. All staff are responsible for following this policy, attending training, and reporting concerns without delay. Leadership is accountable for ensuring this policy is implemented consistently across the Academy.

Training and Awareness

All staff at ESSI Academy receive training on data protection and GDPR compliance during their induction and through periodic refreshers. Training covers safe data handling, breach reporting, and understanding individual rights.

Policy Review

This policy is reviewed annually by the Internal Quality Assurance (IQA) Committee or more frequently if there are legal updates or significant changes in the Academy's practices.

Contact Information

For any questions or data-related concerns, please contact:

Data Protection Officer (DPO)

Email: dpo@essi.mt