

## **Plaza Competition Privacy Notice**

*Last updated on the 27 November 2019.*

*Any capitalised terms used in this Privacy Notice are to be attributed the same meaning attributed thereto under the Plaza Competition Terms and Conditions, unless otherwise defined herein.*

We, namely, Plaza Centres plc, a public limited liability company registered in Malta, bearing company registration number C 564 and having its registered address at The Plaza Commercial Centre, Bisazza Street, Sliema, Malta, are the Organiser and the Data Controller of your personal data (hereinafter referred to as “We”, “Us” or “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 on the abovementioned address or by email at [info@plazamalta.com](mailto:info@plazamalta.com). You may also wish to contact us by telephone on 21343832/3/4.

This Privacy Notice sets out the basis on which the personal that you provide us with, will be processed by Us in connection with our competition processes.

Please read this Privacy Notice carefully to understand our practices with respect to your personal data and how we will process and safeguard it.

References to “data controller”, “data subject”, “personal data”, “process”, “processed”, “processing” and “Data Protection Officer” in this Privacy Notice have the meanings set out in, and will be interpreted in accordance with applicable laws, including but not limited to the Data Protection Regulation (EU) 2016/679 and the Data Protection Act, Chapter 586 of the Laws of Malta and subsidiary legislation thereto, as may be amended from time to time.

### **1. Updates**

We may update this Privacy Notice 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:

- Name;
- Surname;
- Email Address;
- Telephone Number; and
- Home address.

Personal data also 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.

#### **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 a winner of the Competition, 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.

#### **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 Plaza 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 a winner of the Competition.

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

#### **7. Recipients**

We may share your personal data with third party recipients who 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;
- third parties to whom disclosure may be required as a result of the Competition;
- 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 or if you wish that we contact you with respect to communications related to updates, newsletters and events in cases where we do not have a legitimate interest to send you such communications.

## **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 at the details indicated above.

### **11. Keeping your 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 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](http://www.idpc.gov.mt)).