The Child Educare Services of the University of Malta

Kids On Campus Summer School

Privacy Notice

1. Data Controller and Legal Framework

The University of Malta (**"UM"**) is the Data Controller for personal data processed in connection with its Child Educare Services.

Processing is carried out in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and the Data Protection Act (Chapter 586 of the Laws of Malta).

2. Categories of Personal Data Processed

The Summer School processes only personal data that is necessary and proportionate for the provision of educational and recreational activities, such as:

(a) **Child Data** (Identification details (name, date of birth), Attendance records, Educational and activity participation records, Health information (including allergies, dietary needs, medical conditions, emergency instructions), Accident and incident reports, Safeguarding-related information where legally required)

Provided that health and safeguarding information constitutes special category data under Article 9 GDPR and is processed only where strictly necessary.

(b) **Parent / Guardian Data** (Contact details, Emergency contact information, Administrative and enrolment records, Payment information (where applicable)

The Summer School does not process personal data for profiling, automated decision-making, or commercial marketing purposes.

3. Purposes

Personal data is processed strictly for the following purposes:

3.1 Programme Delivery

Organisation of educational, sports, and recreational activities, supervision of children, communication with parents, and general administration.

3.2 Health and Safety Management

Allergy management, first aid, emergency response, accident reporting, and safeguarding obligations.

3.3 Safeguarding and Legal Obligations

Where disclosure to competent authorities is required by law.

3.4 Educational Documentation (Internal Use)

Photographs or observations may be used internally to document activities and support communication with parents about their child's participation. These are not publicly disclosed.

3.5 Parent Communication Within the Programme

Photographs of activities may occasionally be shared by educators with the relevant class parent group through secure communication channels to provide

updates on programme activities.
Such sharing is limited to that class group and is not considered public publication.

4. Photographs and Videos for Public Communication

With explicit parental consent, photographs or videos may be used for publication on official University of Malta and Child Educare Services platforms, including:

Official websites

Official Facebook and Instagram accounts

This use is voluntary and not a condition of participation. Refusal will not affect a child's involvement in any activity.

Social media platforms may act as independent data controllers and may process data according to their own privacy policies, including possible transfers outside the European Economic Area. The University does not control further dissemination once content is made public.

5. Personal data is stored securely, accessible strictly on a need-to-know basis and limited to authorised personnel. Access may be granted only to: The Centre Manager; teachers and LSEs; Authorised University administrative personnel where operationally necessary; and Assessors or competent authorities in the case of accidents or safeguarding matters.

All staff are bound by confidentiality obligations and receive appropriate data protection awareness.

6. Personal data is retained only for as long as necessary for the purposes for which it was collected. Core records are retained for the duration of enrolment. Accident and incident records are retained in line with statutory limitation periods and health and safety obligations. Safeguarding records may be retained longer where required by law or to protect legal rights. Learning journals are provided to parents/legal guardians at the end of enrolment and the Centres retain only minimal documentation necessary for compliance and accountability purposes.

Promotional photographs based on consent are reviewed periodically and removed where no longer necessary or where consent is withdrawn.

7. Data Subject Rights

Parents or legal guardians may exercise the following rights in relation to their child's personal data:

(a) Right of access

(b) Right to rectification

(c) Right to restriction of processing

(d) Right to erasure (where legally applicable)

(e) Right to object (where applicable)

(f) Right to withdraw consent (where processing is based on consent)

Requests should be submitted to the University's Data Protection Officer.

8. Contacts:

For data protection matters, parents or legal guardians may contact:

(a) University Data Protection Officer: **idpu@um.edu.mt**

(b) Summer School: **kidsoncampus@um.edu.mt**

You have the right to lodge a complaint with the Office of the Information and Data Protection Commissioner (IDPC), Malta.