



Website Privacy Notice

This Privacy Notice complies with the EU General Data Protection Regulation ((EU) 2016/679) (GDPR). It informs those visiting and using the website <http://www.jugsmalta.com>. Users are notified about the personal data that Jugs Malta processes in relation to their experience when visiting the website, for what purpose it is held and for how long it is expected to be used.

Website Privacy Notice

1. DEFINITIONS

Welcome to JUGS@Malta's Privacy Notice.

For ease of reference and better understanding we are listing the meaning of some of the terms used in this Privacy Notice.

Consent of the Data Subject means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her.

Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.

Data Subject means any identified or identifiable natural person to whom Personal Data relates.

Personal Data means any information relating to an identified or identifiable natural person. It does not include data from or through which the person's identity cannot be determined (anonymous data).

Personal Data Breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise Processed.

Processing means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processor means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.

GDPR means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural person with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

DP Act means Chapter 586 of the Laws of Malta (the Data Protection Act) and any subsidiary legislation thereunder, as may be amended from time to time.

Applicable Laws means the GDPR and the DP Act.

2. INTRODUCTION AND PURPOSE OF THIS PRIVACY NOTICE

JUGS@Malta Limited (C 29241) (the "Company", "We", "Us" or "Our") is committed to protecting the privacy of individuals whose Personal Data We Process (each individually a "Data Subject", "You" or "Your"). It is the aim of this Privacy Notice to give you information on how the Company collects and Processes Your Personal Data when You contact Us generally or when You visit and/or use Our website <http://www.jugsmalta.com> (the "Website"), including the manner in which We Process any data you may provide through this Website when you sign up to our newsletter or contact Us through the means available on the website.

We do not knowingly collect data relating to minors since this Website is not intended for minors.

3. WHO WE ARE

JUGS@Malta Limited, having its registered office situated at 160, Business Leaders Hub, Mdina Road, Zebbug ZBG9015, Malta, is the Controller of Your Personal Data.

Website Privacy Notice

Should You wish to contact Us for any reason with respect to Our Processing of Your Personal Data, You may do so using the below details.

JUGS@Malta Limited

Email address: info@jugsmalta.com

Phone: +356 2138 3825

Postal address: 160, Business Leaders Hub, Mdina Road, Zebbug ZBG9105, Malta

4. COMPLAINTS

You have the right to make a complaint with respect to the Processing of Your Personal Data at any time to any supervisory authority. The supervisory authority in Malta is the Office of the Information and Data Protection Commissioner (the “IDPC”), the contact details of which are as follows:

Name: Information and Data Protection Commissioner
Address: Floor 2, Airways House, Triq il-Kbira, Tas-Sliema SLM 1549, Malta
Email: idpc.info@idpc.org.mt
Landline: +356 2328 7100

We would, however, appreciate the chance to deal with Your concerns Ourselves before You approach the IDPC, so please contact Us in the first instance.

5. CHANGES TO THIS PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES TO YOUR PERSONAL DATA

This Privacy Notice was last updated in July 2023.

During Your relationship with Us, We strive to see that Your Personal Data is correct and up-to-date. We thus urge You to keep Us informed of any changes in or to Your Personal Data.

6. THE PERSONAL DATA WE COLLECT ABOUT YOU

In the context of this Privacy Notice, We may process different kinds of personal data about You, which we have grouped together below:

- **Identity Data** includes Your first name and last name.
- **Contact Data** includes Your email address and mobile or telephone number.
- **Information and Communications Data** includes Your preferences in receiving information from Us and Your communication preferences.
- **Employment Data** includes Your CV, job application and references, information relating to Your employment history, and any other information You may provide Us with via the ‘Careers’ page on Our Website.
- **Cookie Data** includes information collected via cookies placed on Our Website, as further detailed in our [Cookie Policy](#).
- **Photographic Data** includes photographs and/or footage of You captured during marketing events which the Company organises or participates in.

7. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect Personal Data from and about You, including through:

Website Privacy Notice

- **Direct interactions:** You may give us your Personal Data by filling in forms on Our Website or by corresponding with Us by post, phone, email, or otherwise. This includes Personal Data You provide when You:
 - contact Us via post, phone, email, social media, or the ‘Get In Touch’ or ‘Tell Us More’ page on Our Website, whether to enquire about Our products or services, to send Us requests, complaints or feedback, or for any other reason;
 - express interest in joining Our Company via the ‘Careers’ page on Our Website; and
 - subscribe to Our mailing list.
- **Cookies on Our Website:** We may collect Personal Data about You via the cookies placed on Our Website, as further detailed in our [Cookie Policy](#).
- **Third parties or publicly available sources:** We may receive Personal Data about You from analytics providers, such as Google based outside the EU.

8. PURPOSES AND LAWFUL BASES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways We plan to use Your Personal Data, and which of the legal bases (in terms of the Applicable Laws) we rely on to do so. We have also identified what Our legitimate interests are, where appropriate.

Note that We may process Your Personal Data on more than one lawful basis, depending on the specific purpose for and context in which We are using Your Personal Data. Please [Contact us](#) if you need details about the specific legal basis we are relying on to Process Your Personal Data where more than one legal basis has been set out in the table below.

Purpose of Processing	Category/ies of Personal Data	Lawful basis/es for processing
To process and respond to Your queries, requests, feedback, complaints, or any other communication received via post, phone, email, social media, the ‘Get In Touch’ page on Our Website, or otherwise	a. Identity Data b. Contact Data c. Any other Personal Data You may provide us with in Your communication to Us	a. Our legitimate interest to efficiently handle queries, requests, feedback, complaints, and any other communications received in relation to Our Company and business b. In the case that You enquire about or request Our products or services, necessity for Us to take steps at Your request prior to entering into a contract with You or with the corporate entity You represent
To assess Your suitability for employment when You express an interest in joining Our Company via the ‘Careers’ page on Our Website	a. Identity Data b. Contact Data c. Employment Data	a. Adherence to our legal obligations, particularly in ensuring, as Your prospective employer, that we are legally permitted to employ You b. Our legitimate interest: <ul style="list-style-type: none"> i. to ensure that We remain organised and are able to administer Our workforce smoothly; ii. to be able to exercise Our rights or defend Ourselves in the case of any litigious

Website Privacy Notice

		<p>disputes or criminal proceedings;</p> <p>iii. to facilitate communication with You, in Your capacity as Our prospective employee; and</p> <p>iv. to ensure that We employ suitable personnel to Our workforce.</p>
To add You to Our database and communicate with You about Our products and/or services and deliver relevant advertisements to You, such as through Our newsletters	<p>a. Identity Data</p> <p>b. Contact Data</p> <p>c. Information and Communications Data</p>	<p>a. Your Consent</p> <p>b. In the event that You are an existing or past client of the Company, and only insofar as the marketing and advertising relates to similar products or services to those You have procured from Us in the past, Our legitimate interest to address effective and relevant marketing and advertising to Our existing and past clients</p>
To administer Our Website	<p>a. Cookie Data</p>	<p>a. Our legitimate interest to administer Our Website efficiently and securely</p> <p>b. Your Consent</p>
To document and advertise Our organisation of, or participation in, marketing events	<p>a. Photographic Data</p>	<p>a. Our legitimate interest to document and advertise Our organisation of, or participation in, marketing events</p>
To establish, exercise or defend legal claims	<p>a. Identity Data</p> <p>b. Contact Data</p> <p>c. Any other Personal Data You may provide us with in Your communication to Us</p> <p>d. Employment Data</p> <p>e. Photographic Data</p> <p>f. Information and Communications Data</p>	<p>b. Our legitimate interest to establish, exercise or defend legal claims</p>

9. MARKETING

We strive to provide You with choices regarding certain uses of Your Personal Data, particularly with respect to marketing and advertising. We have thus given You the choice as to whether You wish to receive marketing material from Us and the way You want this to be communicated to You.

In the event that You are a past or existing client of the Company, We may use Your Personal Data, without Your prior Consent, to communicate with You about Our products and/or services which are similar to those You have procured from the

Website Privacy Notice

Company in the past and which we reasonably believe You may be interested in. In any such event, You have the right to object to this Processing of Your Personal Data, in which case We shall cease any such marketing communications with You immediately.

THIRD-PARTY MARKETING

We will get your express opt-in Consent before We share Your Personal Data with any company outside the Company for marketing purposes.

OPTING OUT

You can ask Us or third parties to stop sending You marketing messages at any time by following the opt-out links on any marketing message sent to You or by [Contacting us](#) at any time.

If You opt out of receiving these marketing messages, We may nonetheless Process Your Personal Data for the other purposes, and on the respective lawful bases, listed under section 8 above, where applicable.

10. AUTOMATED DECISION-MAKING AND PROFILING

We do not use Your Personal Data in order to carry out any automated decision-making or profiling. In the event that We decide to carry out any such automated decision-making or profiling in the future, We shall inform You prior to making any such use of Your Personal Data.

11. COOKIES

Our site uses session cookies only. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see Our [Cookie Policy](#).

12. CHANGE OF PURPOSE

We will only use Your Personal Data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If You wish to receive an explanation as to how the Processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If We need to use Your Personal Data for a purpose that is unrelated to the original purpose of collection of that data, We will notify You and We will explain the lawful basis which allows us to do so.

Please note that We may Process Your Personal Data without Your knowledge or consent, where this is required or permitted by law, particularly the Applicable Laws.

13. DISCLOSURES OF YOUR PERSONAL DATA

In the course of Our business, We work with third parties, typically Our service providers or subcontractors, who may also be Our Processors. In particular, We may have to share Your Personal Data with the third parties set out below.

IT Service Providers	Service providers that manage and/or provide Us with support in relation to Our IT systems, including Our servers, cloud infrastructure and Website.
Marketing Consultancy Service Providers	Marketing consultancy service providers to which We outsource the operation of Our Company's marketing department.
Third-Party Consultants and Professional Advisors	Service providers that assist Us in various matters relating to Our business, including lawyers, accountants and

	insurers.
Regulators, courts, law enforcement and other authorities	Entities that may require the disclosure of Our Processing activities in certain circumstances, such as the executive police.

We will, in usual circumstances, not disclose Your Personal Data to third parties without Your Consent. There may, however, be times where We may need to disclose Your Personal Data to third parties without Your Consent, such as when abiding by a court order, and We shall only do so in accordance with the law, including the Applicable Laws.

We may also be required to Process Your Personal Data with third parties to whom we may choose to sell, transfer, or merge parts of Our business or Our assets. Alternatively, We may seek to acquire other businesses or merge with them.

We require all third parties to respect the security of Your Personal Data and to treat it in accordance with the law, including the Applicable Laws. We do not allow our third-party service providers to use Your Personal Data for their own purposes and only permit them to Process Your Personal Data for specified purposes and in accordance with Our instructions.

14. INTERNATIONAL TRANSFERS

We may transfer Your Personal Data to persons or entities outside the EU and the European Economic Area (the “EEA”) for the following purposes:

- a. receiving IT support;
- b. adherence with Our legal and/or regulatory obligations;
- c. the establishment, exercise or defence of legal claims; and/or
- d. any other reason where any such transfer would be permitted in terms of law.

In the event of any such transfer of Your Personal Data to countries which are outside the EU/EEA, we shall ensure that a lawful basis for this exists and that appropriate safeguards are implemented for the protection of Your Personal Data, in accordance with the Applicable Laws.

15. DATA SECURITY

We have put in place appropriate security measures to prevent Your Personal Data from being accidentally lost, used, or accessed, altered or disclosed in an unauthorised way. These include IT security measures, such as authentication measures, encryption, appropriate data backup measures, and anti-malware and anti-virus software, as well as physical security measures, such as the installation of fire and intruder alarms at Our premises.

We also carry out periodical reviews of Our data security measures and regularly perform vulnerability scans and penetration testing on Our IT systems, in order to ensure that Our IT security is constantly up to standard.

In addition, we limit access to Your Personal Data to those employees, agents, contractors and other third parties who have a business need to access and/or use such data. They will only Process Your Personal Data on Our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data Breach and will notify You and any applicable regulator of any such breach where We are legally required to do so.

16. DATA RETENTION

We will only retain Your Personal Data for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements that may be applicable.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of Your Personal Data, the purposes for which We process Your Personal Data and whether We can achieve those purposes through other means, and the applicable legal requirements.

Website Privacy Notice

Our standard practice is to determine whether there are any specific laws permitting or obliging us to keep certain Personal Data for a certain period of time, in which case We will typically keep the Personal Data for the maximum period indicated by any such law.

With prejudice to the hereunder, We would also determine whether there are any laws and/or contracts that may be invoked against Us by You and/or third parties and, if so, what the prescriptive periods for such actions are. These periods are usually of two or five years. In such cases, We will keep any relevant Personal Data that We may need to defend ourselves against any claims, challenges or other such actions by You and/or third parties for such time as is necessary.

We generally retain Your Identity Data and Contact Data collected when You contact Us with a query, request, feedback, complaint, or any other communication, for a period of 6 months following Our last communication with You regarding the relevant communication, unless consent is obtained to retain for longer, including through soft opt-in for marketing under SL586.01.

In the case that You enquire about or request Our products or services, We shall retain Your Identity Data, Contact Data and any other Personal Data You may provide Us with for a period of 6 months following Our last communication with You regarding the relevant enquiry or request, unless consent is obtained to retain for longer, including through soft opt-in for marketing under SL586.01. In the event that You purchase Our products or engage Our services pursuant to such enquiry or request, any further Processing of Your Personal Data shall be governed by a separate privacy notice annexed to Our quotation provided to You for the relevant purchase or provision of services.

In the case that You submit Your Identity Data, Contact Data and Employment Data to Us for the purpose of expressing interest in joining Our Company and You are not employed by Our Company, We shall retain Your Personal Data for a period of four (4) months from Our rejection of Your job application, in order to be able to defend Ourselves against any legal claims in this regard. We shall only retain Your Personal Data following expiry of this 4-month period if We have Your Consent to do so, and for the purpose of contacting You in the event of any future vacancies within Our Company which may interest or be relevant to You. Should You withdraw Your Consent for such retention of Your Personal Data beyond the afore-mentioned 4-year period, We shall delete such data entirely. In the event that You are employed by Our Company, any further Processing of Your Personal Data shall be governed by a separate privacy notice to be provided to You upon Your employment with the Company.

We generally retain Your Identity Data, Contact Data, and Information and Communications Data indefinitely for the purpose of adding such data to Our database, communicating with You about Our products and services, and delivering relevant advertisements to You (such as through Our newsletters), unless you withdraw Your Consent or object to Our retention of such Personal Data, in which case We shall delete such data entirely.

We generally retain Photographic Data of You captured at marketing events which We organise or participate in and for which we obtain consent for this Data, until consent is withdrawn.

For information on Our retention of Your Cookie Data, kindly refer to Our [Cookie Policy](#).

17. YOUR LEGAL RIGHTS

You have the right to:

Access your personal data. This enables You to receive a copy of the Personal Data We hold about You and to check that We are lawfully processing it.

Rectify the Personal Data that We hold about You. We may need to verify the accuracy of the new data You provide to Us before You amend any incomplete or inaccurate data We hold about You.

Be forgotten. Note, however, that We may not always be able to comply with Your request of erasure for specific legal reasons which will be notified to You, if applicable, at the time of Your request.

Object to Processing of Your Personal Data where We are relying on a legitimate interest (or those of a third party) for such

Website Privacy Notice

Processing. You also have the right to object where We are processing Your personal data for direct marketing purposes. In some cases, We may demonstrate that We have compelling legitimate grounds to process Your Personal Data which override Your rights and freedoms.

Restrict the Processing of Your Personal Data. This enables You to ask Us to suspend the processing of your personal data in the following scenarios: (a) if You want us to establish the data's accuracy; (b) where Our use of the data is unlawful but You do not want Us to erase it; (c) where You need Us to hold the data even if We no longer require it as You need it to establish, exercise or defend legal claims; or (d) You have objected to Our use of your data but We need to verify whether We have overriding legitimate grounds to use it.

Request the transfer of Your Personal Data to You or to a third party in a structured, commonly used and machine-readable format (except where such Personal Data was provided to Us in handwritten format, in which case, upon Your request, such Personal Data will be provided to You in such handwritten format.

Withdraw Consent at any time where We are relying on Your Consent to Process Your Personal Data. However, this will not affect the lawfulness of any processing carried out before such withdrawal.

Object to a decision taken solely on the basis of automated Processing, including profiling, which has an impact on You or significantly affects You.

If you wish to exercise any of the rights set out above, please [Contact us](#).

NO FEE USUALLY REQUIRED

You will not have to pay a fee to exercise any of the above-listed rights. However, We may charge a reasonable fee if Your request is clearly unfounded, repetitive or excessive.

TIME LIMIT TO RESPOND

We will generally respond to all legitimate requests from You within one month. Occasionally, this 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 of this and keep you updated accordingly.

18. GOVERNING LAW

This Privacy Notice is governed by and construed in accordance with the laws of Malta and relevant EU legislation.