

Club 25 Privacy Policy

General Data Protection Regulation

All data retained by Club 25 is in accordance with the General Data Protection Regulation, Regulation (EU) 2016/679. This regulation seeks to strengthen the protection given to personal data. We strive to ensure that any Personal Data that we have in our possession, is properly processed in terms of the law and shall strive to ensure proper protection for your Personal Data. Your Personal Data is critical for our business and for the provision of our services and thus its security and proper use is of paramount importance to us.

What is Personal Data?

In order to provide a proper and genuine service, it is essential that Club 25 retains personal data of all its customers. Personal data is personal information about an individual, information which identifies such individual. We collect such information about our customers for relationship management, statistical reasons and for marketing purposes. We may also collect some personal information from other individuals who are not our customers, for marketing purposes, subject to their consent.

Personal Data may also be of a general nature and of a special nature. Generic Personal Data refers to data such as names, surnames, contact details and similar data which can be used to identify a person. Special categories of Personal Data relate to more confidential kind of Personal Data such as health data, which we do not collect and/or retain. Feel free to send us an e-mail asking about the data we retain in your name. You also have a right to ask for the destruction of your data, which we are duty bound by law to do if you request such.

What kind of Personal Data do we process?

Club 25 generally collects Personal Data regarding our clients at the below stages of our relationship with our customers:

1. When we assist a client to find a property to buy or rent;
2. When we assist a client to sell or lease out a property;
3. When we are about to conclude a sale or lease and collect additional Personal Data as required by the law, and in terms of Anti-Money Laundering Legislations.

In the cases here above-mentioned, the documents and data collected is that required by law, in accordance and in conjunction with the Anti-Money Laundering Regulations. We will process all your data in accordance and in terms of the General Data Protection Regulation, Article 6(1) et Seq, depending on the situation at hand.

Disclosure & Data Transfers

There are laws, both locally and at European Union level, which may require Club 25 to transfer your personal data to regulatory bodies and/or government authorities. When such requests from such bodies or authorities are done in accordance and in terms of the law, Club 25 will have no other option but to transfer such data. We may be obliged to provide such data and we may also be prevented from informing you that such data has been provided. Such a situation may arise when information is requested by the FIAU, FCID, and the Malta Police Force amongst others. Since we are in the business of Real Estate, your information may be requested, and transferred to all regulatory authorities, including the Inland Revenue Department, as well as bodies which deal with searches over immovable properties. Any Personal Data collected in this regard shall be processed and stored in terms of the law.

Retention Periods

We will retain your Personal Data that we receive from the prospect of a business relationship, at least until the end of your business relationship with Club25 unless there are statutory retention obligations or potential claims that are not yet time-barred. We shall keep your personal data, which arises out of a business relationship for at least 5 years. Such data will be kept to protect us from statutory obligations, especially those in relation to due diligence as well as, in relation to current legislation to prevent money laundering and funding of terrorism. Under such laws, data retention is extended to a period of 10 years. Personal Data will also be held for 10 years due to the local legislation on taxation matters, which requires that such data be retained for a minimum period of 10 years.

Right to be Forgotten

Notwithstanding the aforementioned, an individual has a right to be forgotten, whereby although data will be retained, it will be retained as anonymous rather than by name. Notwithstanding this, Club 25 reserves the right to hold your personal data for the duration of time set out by local authorities and legislation. Hence, there may be situations that until

the lapse of the 10 year period explained, your right to be forgotten may not be exercised as local legislation supersedes this right.

Data Security Measures

Club 25 is committed to ensure that data is secured on their website and social media platforms. Services such as encryptions, firewalls, anti-virus software and access to restrictions, as well as strict enforcement policies are put forward. Club 25 ensures that your Personal Data is kept in accordance with legislation, and is not subject to unauthorised access, disclosure, modifications and/or destructions. Notwithstanding the above, although Club25 will do it's utmost to secure your data, due to the digital world we live in, we cannot provide a 100% guarantee in relation to our system security.

Contact us

Should you have any queries about this Privacy Policy, as well as if you want to exercise your Right to be Forgotten, as well as if you have any questions with regards to your data retention, please do not hesitate to contact us on:

E-mail: support@club25.com.mt