

# 1. Privacy Policy

Our Privacy Policy (this “Policy”) is made compliant with the General Data Protection Regulation (the “GDPR”), (Regulation (EU) 2016/679) and with the Data Protection Act (Cap. 586) of the Laws of Malta (collectively referred to as the “Applicable Legislation”).

- One of your rights under Applicable Legislation is that you must be informed when an organisation is Processing your Personal Data.
- You also have the right to know the details and purpose of that Processing.

New Healthcare Limited, located at 47 Oya Building, MRS 1547, Marsa, Malta (“New Healthcare”), is the data controller for the purpose of Applicable Legislation for the Processing of Personal Data during the normal course of its business, including but not limited to:

Its employees, contractors, suppliers, service providers, advisers, clients, and visitors to its website located at <https://new-healthcare.mt> (the “Website”). This Website and all related content and platforms (collectively, the “Sites”) are subject to your compliance with this Policy.

This Policy outlines how New Healthcare LTD processes Personal Data collected:

- Through the Sites.
- During your interactions with New Healthcare LTD.
- and during the provision of services by or to New Healthcare LTD.

## 2. Definitions

- “Data Subjects” refers to any identified or identifiable natural person to whom Personal Data relates.
- “Personal Data” refers to any information that directly or indirectly identifies a specific individual.
- “Processing” refers to any operation performed on Personal Data, including collection, recording, storage, retrieval, use, disclosure, or deletion.
- “You” refers to individuals interacting with New Healthcare LTD, including employees, contractors, service providers, clients, and visitors to the Sites.

## 3. New Healthcare’s Obligations

In line with GDPR principles, New Healthcare LTD ensures that:

- Personal Data is processed fairly, lawfully, and transparently.
- Personal Data is collected only for specified and legitimate purposes.
- Personal Data is limited to what is necessary for the stated purposes.
- Personal Data is accurate and kept up to date, with inaccurate data corrected or erased promptly.
- Personal Data is stored securely and only for as long as necessary.
- Appropriate security measures protect Personal Data from unauthorized access, loss, or destruction.

## **4. Processing of Personal Data**

New Healthcare processes Personal Data to fulfill its obligations under various relationships, including employment, service agreements, client interactions, and compliance with legal and regulatory requirements. This includes:

- Matching career seekers with potential employers (if applicable).
- Sharing client or supplier details as part of service delivery.
- Managing recruitment and HR-related processes.
- Answering queries and providing updates on products or services.

### **Consent**

Where consent is required for Processing, New Healthcare LTD ensures that:

- Consent is freely given, specific, and informed.
- No pre-ticked boxes or implicit assumptions indicate consent.
- The right to withdraw consent at any time is clearly communicated.

## **5. Personal Data Sharing and Disclosure**

New Healthcare LTD does not sell Personal Data to third parties. However, Personal Data may be shared with:

- Subsidiaries and affiliates within New Healthcare LTD's group of companies.
- Service providers such as IT consultants and legal advisers.

- Law enforcement and regulatory authorities where required by law.
- Potential business partners or purchasers in case of mergers or acquisitions.
- Data shared outside the EEA will comply with Applicable Legislation, ensuring adequate protection.

## **6. Data Subject Rights**

Data Subjects have the following rights:

- The right to access, rectify, or erase Personal Data.
- The right to restrict or object to Processing.
- The right to data portability.
- The right to file a complaint with a supervisory authority.
- The right to withdraw consent.

Requests regarding Personal Data can be directed to the contact provided in Section 12.

## **7. Security**

New Healthcare LTD implements technical and organizational measures to safeguard Personal Data from unauthorized access, loss, or misuse.

## **8. Data Retention**

Personal Data is retained for a minimum of five years following the end of the legal relationship unless otherwise required by law or for legitimate business purposes.

## **9. Cookie Policy**

New Healthcare LTD's Website uses cookies to enhance user experience and analyze web traffic. Cookies help tailor the Website to individual preferences. Users can modify their browser settings to disable cookies, although this may limit certain functionalities of the Website.

## **10. Links to Other Websites**

The Website may contain links to third-party websites. New Healthcare LTD is not responsible for the privacy practices of these external sites.

## 11. Changes to this Privacy Policy

This Policy may be updated periodically. Continued use of the Website indicates acceptance of the updated Policy.

## 12. Data Storage for the Newsletter

If you subscribe to our email newsletter, we collect and process the following data:

- Email address

The data you provide is necessary for fulfilling the contract or carrying out pre-contractual measures. Without this data, we cannot send the email newsletter. Data is not shared with third parties, except for transmission to our newsletter service provider for the purpose of sending the newsletter and fulfilling our tax obligations.

Data processing is carried out based on the legal provisions of § 96 para. 3 TKG as well as Article 6 para. 1 lit. a (consent) and/or lit. b (necessary for contract fulfillment) of the GDPR.

## 13. Privacy Policy for the Use of Google Analytics

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "cookies," which are text files stored on your computer, to analyze your use of the website. The information generated by the cookie about your use of this website is generally transmitted to and stored on a Google server in the United States. However, if IP anonymization is activated on this website, your IP address will be shortened by Google within member states of the European Union or in other countries that are parties to the Agreement on the European Economic Area.

Only in exceptional cases is the full IP address transmitted to a Google server in the United States and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, compile reports on website activity, and provide other services related to website and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

You can prevent the storage of cookies by adjusting your browser settings; however, please note that doing so may limit your ability to use all features of this website fully. Additionally, you can prevent Google from collecting the data generated by cookies related to your use of the website (including your IP address) and processing this data by downloading and installing the browser plugin available at the following link: [Browser Add-on to Disable GoogleAnalytics.](#)

## **14. Contacting Us**

For any questions or concerns regarding this Policy, please contact:

New Healthcare Limited  
47 Oya Building, MRS 1547, Marsa, Malta