

vs

COMPLAINT

1. On the 26th September 2025, [REDACTED] (the “**complainant**”), a registered media strategist, a director of [REDACTED] and non-executive director on the board of [REDACTED] lodged a data protection complaint with the Information and Data Protection Commissioner (the “**Commissioner**”) pursuant to article 77(1) of the General Data Protection Regulation¹ (the “**Regulation**”), alleging that [REDACTED] (the “**controller**”) unlawfully disclosed her personal data publicly on his Facebook profile².
2. The complainant submitted that the controller “*has posted on Facebook a personal email sent to him inviting him to attend a [REDACTED] meeting. As a PR strategy company, we were representing [REDACTED] locally. The email contains personal details, including my phone number and email. Not only, he also produced on Facebook the [REDACTED] in Directors Notice, leaving my ID card, and address exposed for all to see. Apart from being unethical and unprofessional, this is a data breach that exposes me to identity theft and scams.*”.
3. As supporting documentation submitted along the complaint, the complainant provided the Commissioner with copies of the screenshots depicting two (2) Facebook posts published by the controller on his Facebook profile:
 - a. a copy of the “*Notification of changes among directors or company secretary or in the representation of the company and the directors’ consent and declaration for appointment pursuant to Articles 139(1), 139(5) and 146(1)*” in relation to [REDACTED]

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

² [REDACTED]

██████████ dated the 1st March 2024, in which it contained the personal data of the complainant, namely, her name and surname, identity card number and residential address; and

- b. an email dated the 9th September 2025, sent by the complainant to the controller, which included the complainant's email address and mobile number, and in which, acting in her capacity as a director at ██████████, she invited the controller to facilitate a meeting with the CEO of ██████████

INVESTIGATION

- 4. Pursuant to the internal investigative procedure of this Office, the Commissioner provided the controller with the opportunity to rebut the arguments of the complainant and submit any information that he deemed relevant and necessary to defend himself against the allegation raised by the complainant. In terms of article 58(1)(e) of the Regulation, the Commissioner requested the controller to specify the legal basis under article 6(1) of the Regulation on which he relied for publishing the personal data of the complainant.

Submissions of the controller

- 5. On the 5th October 2025, the controller submitted the following information in response to the request of the Commissioner:

Swift Removal and Remediation

- a. that, upon being made aware of concerns regarding the publication of information, the controller took immediate steps to remove the data within a matter of days and without prejudice to the submissions being made, it is clear that the actions of the controller demonstrate his commitment to the accountability principle under article 5(2) of the Regulation and evidence a responsible and responsive attitude towards concerns that were raised;
- b. that, moreover, any potential risk of harm was contained and minimised to the extent that no harm whatsoever can be considered to have been suffered by the complainant;

Data Already in the Public Domain

- c. that the data in question were already available in the public domain at the time of publication, and indeed, it is to be given due consideration that the “*primary*” controller of the information, the [REDACTED] would have taken appropriate measures to ensure that any “*sensitive*” data was protected at the point of availability;
- d. that the data could have been accessed by anyone with an e-ID at any time of the day and without any real constraints;
- e. that, in accordance with article 9(2)(e) of the Regulation, information that has been “*manifestly made public by the data subject*” (which is the case here when the complainant placed herself in the office in connection with the data which were made publicly available) may lawfully be processed without infringing data protection principles;
- f. that, in effect, the controller made use of information already in the public domain in a manner, he believes, that did not materially extend the reach of the information beyond what the complainant herself had chosen to disclose or what was already lawfully accessible;

Legal Basis and Legitimate Interest

- g. that the data was published in the context of an ongoing debate on the propriety of the complainants’ and the controller’s position on a matter of public interest, namely, the manner in which the controller was able to communicate his views on a matter of public interest and the extent to which the complainant was empowered and/or properly entitled to place constraints on the controller in this regard;
- h. that the publication by the controller was made only to confirm the veracity of the facts referred to in his Facebook post³ a few minutes earlier;
- i. that the controller contended that the complainant was clearly behaving in a manner that was prejudicial to his freedom to communicate his views publicly. As such, the controller was entitled to publicise the interactions he had with the complainant;

³ [REDACTED] was provided to the Commissioner as part of the controller’s submissions.

- j. that the publication of the information was carried out on the basis of legitimate interest (Article 6(1)(f) of the Regulation), namely the pursuit of transparency and the dissemination of information already within the public sphere;
- k. that the controller, in the interests of transparency, believed that a reproduction of data held by the [REDACTED] was legitimate, and demonstrated his own full respect of the applicable principles by immediately modifying the data published, as already stated;

Absence of Harm

- l. that it is noteworthy that no evidence has been presented of material or non-material damage suffered by the complainant, and it is submitted that the temporary and limited nature of the publication meant that no meaningful intrusion into privacy occurred;

Proportionality and Context

- m. that for completeness and without prejudice to the foregoing, that even if the Commissioner were to consider that a technical infringement occurred, the controller submitted that the remedial action taken, the absence of actual harm, and the context of the publication of data that were already in the public domain all strongly militate against the imposition of any punitive measure; and

Specific points raised by the complainant

- n. that the complainant complains that the controller publicised a “*personal email*”, however, the complainant fails to state that in no way was the email covered by a form of confidentiality statement or restriction on publication and any individual who does not wish to have personal data she appears to be so eager to protect (as is her right) should not, with due respect, send such data out without even minimal confidentiality cover.

Submissions of the complainant

- 6. Pursuant to the internal investigative procedure of the Office, the complainant was provided with the opportunity to rebut the arguments of the controller. On the 28th October 2025, the

complainant submitted the following salient arguments for the Commissioner to consider during the legal analysis of the case:

- a. that the complaint concerns the unlawful publication of the complainant's personal data, including her home address, identity card number, and mobile phone number, as well as the selective publication of private correspondence⁴ the complainant sent to the controller in good faith;
- b. that her personal data were made publicly available on the Facebook profile of the controller without her consent or any legitimate public interest and were clearly intended to cause reputational harm, embarrassment and subject the complainant to criticism and ridicule⁵;

Context

- c. that, for some time, the controller was a regular guest on [REDACTED] programme [REDACTED] on [REDACTED] and this segment allowed the controller to discuss financial affairs, and provided him with a platform that also supported his professional visibility;
- d. that during the designated slot on financial literacy on the 17th September 2025, the controller chose to first talk about the local bond market, then [REDACTED] [REDACTED];
- e. that the complainant did not listen to the programme and only became aware of the incident several hours after the programme had ended;
- f. that during the controller's commentary, [REDACTED] reminded the controller that [REDACTED] [REDACTED] as a licensed broadcaster, was bound by stringent broadcasting obligations, however, he was given the opportunity to continue elaborating on [REDACTED] [REDACTED] for thirty (30) minutes;
- g. that following this broadcast, the controller chose to air his grievances publicly on Facebook, and in response, [REDACTED] then posted a clarification beneath his

⁴ The complainant submitted a copy of the reply provided by the controller to her email dated the 9th September 2025.

⁵ The complainant submitted to the Commissioner a copy of the screenshots of the comments posted by Facebook users under the post published by the controller.

Facebook post, addressing his allegation that he had been “*interrupted from expressing his fair opinion*” and at no point did the controller try to contact the [REDACTED] or [REDACTED] to discuss the matter;

- h. that [REDACTED] management then sent a letter to the controller, refuting his false assertions and informing him that his participation as a guest contributor was being terminated with immediate effect and the reply of the management was posted on [REDACTED] Facebook page⁶;
- i. that the complainant is a non-executive director of [REDACTED] which operates [REDACTED] and [REDACTED] but the complainant has absolutely no involvement in its day-to-day affairs, and no inclination or authority to take either editorial or executive decisions;
- j. that the company’s editorial and programming decisions fall exclusively under the remit of the Editor-in-Chief and the Chief Executive Officer, who can corroborate this statement;
- k. that following [REDACTED] decision, the controller published a series of Facebook posts, which made false and damaging allegations against the complainant, her business partner, and their company, [REDACTED];
- l. that in short, the controller alleged that the complainant and her business partner used undue influence to censor and silence him on [REDACTED] radio programme on the basis that they had been engaged (for a four-week period only) by a [REDACTED] [REDACTED] to support [REDACTED] introduction to Malta, which claim is entirely untrue and defamatory, and the controller made absolutely no attempt to verify it;
- m. that the controller has a significant Facebook following (numbering 3,492) who view and engage with his posts, and as a [REDACTED] who often publishes his advice and opinions, his words are deemed to be credible by viewers who view them;
- n. that the controller did not limit himself to one post against the complainant and her business partner, but he published four (4) posts, which drew negative and insulting remarks against the complainant and her business partner;

⁶ A copy of the statement published on the Facebook page of [REDACTED] dated the 25th September 2025, was provided by the complainant together with her submissions.

Unlawful Disclosure of Personal Data

- o. that without prejudice to the foregoing, the controller escalated matters by publishing portions of the private correspondence with the complainant, as well as circulating her personal data, including home address, ID card number, and mobile phone number, while also publishing the name of her business partner, his home address, and ID card number;
- p. that just because the data is “*in the public domain*” via the [REDACTED] does not mean that the controller can simply reuse or disclose someone’s personal data without any lawful basis;

Delayed Removal and continued exposure

- q. that the controller claimed that he took “*immediate steps to remove the data within days*”, but in reality, the offending material remained online for over one week, during which it could be freely copied, shared, and republished by others;
- r. that this delay significantly increased the exposure and risk of further dissemination of the data and a couple of posts remained online and were only redacted, once the Commissioner (presumably, or Facebook) contacted him;

Invalid claim of public interest

- s. that the controller further seeks to justify his conduct by invoking “*public interest*”, however, under Maltese and European law, the concept of public interest does not extend to personal disputes, or professional rivalries, among others;
- t. that publishing the private correspondence and personal details (residential address, ID card number, phone number) add nothing to any genuine public debate about banking or media transparency, and it is purely personal;
- u. that even if the controller believed that there was a legitimate issue, for example, claims of conflict of interest, he could have discussed it without disclosing the complainant’s personal data;

- v. that if the controller truly wished to inform the public about the [REDACTED] acquisition, he could have taken part in the meeting held with [REDACTED] during her visit to Malta, an invitation he declined, which further undermines his claim to have acted in the public interest;
- w. that, furthermore, publishing personal data on the basis of a lie – the controller’s baseless claim was that the complainant used her influence to silence him – can never be in the public interest and quite the contrary, such behaviour runs contrary to the public interest;

Breach of confidence

- x. that the controller also defends his decision to publish a private email on the grounds that the message of the complainant lacked a confidentiality notice, however, the complainant referred to Maltese and European jurisprudence, which recognise that data subjects have a reasonable expectation of privacy in private correspondence, irrespective of whether a confidentiality footer is present;
 - y. that the complainant, as a [REDACTED] for twenty (20) years, she holds journalistic freedoms in the highest regard, and consequently, she considered the actions taken by the controller to bear no relation to legitimate journalism or public interest reporting.
7. Pursuant to the internal investigative procedure of this Office, the Commissioner provided the controller with the final opportunity to rebut the submissions of the complainant. By means of an email dated the 30th October 2025, the controller informed the Commissioner that he does not have any new arguments to submit.

LEGAL ANALYSIS AND DECISION

- 8. The Commissioner proceeded to assess the complaint that was lodged by the complainant in terms of article 77(1) of the Regulation on the 26th September 2025, in which the complainant alleged that the controller unlawfully published two (2) posts on his Facebook profile that contained the complainant’s personal data.
- 9. To this end, the Commissioner examined the supporting documentation submitted by the complainant together with her complaint. These two (2) Facebook posts consisted of: (a) the

[REDACTED] in Directors Notice dated the 1st March 2024, which disclosed the complainant's name and surname, identity card number and residential address; and (b) an email dated the 9th September 2025, which the complainant had sent to the controller inviting him to arrange a meeting with the [REDACTED]

10. For the purpose of this legal analysis, the Commissioner will consider each post separately, namely, personal data obtained from a publicly available register, and personal data which were privately exchanged between the complainant and the controller.

Information that is made publicly available

11. The Commissioner sought to assess the contents of the "*Change in directors or company secretary or legal representation of a company*" pertaining to [REDACTED] which had been published by the controller on his Facebook profile. The Commissioner notes that pursuant to article 146(1) of the Companies Act, this notice contains the names and residential address of both the resigning director and the newly appointed director. Furthermore, the Commissioner observes that the notice dated the 1st March 2024 also contained the identity card number of the complainant.
12. The notice was published on the Facebook profile of the controller and the posts were set to public. This means that the posts, which are the subject of this complaint, were accessible not only to the controller's Facebook friends but also to other users who were not connected to him. Therefore, the making available of personal data to an indefinite number of individuals constitutes a processing activity that falls within the material scope of the Regulation in terms of article 2(1) thereof. Accordingly, the controller was required to specify and rely upon a valid legal basis in terms of article 6(1) of the Regulation to legitimise such processing activity. For this reason, pursuant to article 58(1)(e) of the Regulation, the Commissioner requested the controller to identify which legal basis he relied on to process the personal data of the complainant.
13. By means of the submissions dated the 5th October 2025, the controller submitted that the data in question had already been made publicly available at the time of publication by the Malta Business Registry. Accordingly, the controller argued that the Malta Business Registry is "*the primary controller of the information*". The controller further referred to article 9(2)(e) of the Regulation, which allows the processing of personal data that have been "*manifestly made public by the data subject*". Within this context, the controller maintained that the complainant placed herself as the Director of [REDACTED] and consequently, such information was made publicly available due to the role she exercised.

14. As a preliminary observation, the Commissioner notes that information that is publicly available does not give the controller the automatic right to process such information for its own purposes without a valid legal basis. The existence of a publicly available register, such as the Register of Companies, does not permit the controller to republish or otherwise use the personal data contained therein for purposes completely unrelated to those for which the data were originally made public.
15. The Commissioner referred to the decision ‘*C Planet vs Kummissarju għall-Informazzjoni u l-Protezzjoni ta' Data*’⁷ delivered by the Information and Data Protection Appeals Tribunal (the “**Tribunal**”), in which the appellant argued that the processing of personal data obtained from a publicly available register, namely, the Electoral Register, did not infringe the principle of lawfulness. However, the Tribunal upheld the Commissioner’s decision, noting the Commissioner’s emphasis that the personal data processed for electoral purposes does not automatically grant any controller the unfettered right to process that data for other purposes without an appropriate legal basis under article 6(1) of the Regulation.
16. The European Data Protection Board (the “**EDPB**”) in its “Guidelines 1/2024 on processing of personal data based on Article 6(1)(f) GDPR” provides the following example, which confirms that even where data have been made publicly available by the data subject, the controller must still comply with the principle of lawfulness:

*“A company is printing marketing flyers using images of people’s faces publicly available on the internet and social media platforms. The people appearing in the photos are the ones who have published them. In this case, even when the photos were made public by the data subjects themselves, they could not reasonably expect that their photos would be processed and published by a third party.”*⁸ [emphasis has been added].

17. The controller justified its publication of information pertaining to the complainant by referring to article 9(2)(e) of the Regulation. However, article 9(2)(e) of the Regulation constitutes an exception to the general prohibition established under article 9(1), which precludes the processing of special categories of personal data. This exception applies only where the data in question have been manifestly made public by the data subject. Even in such circumstances, the controller must still identify a legal basis for processing under article 6(1) of the Regulation.

⁷ Appell Numru CDP/DBN/31/2020, decided on the 3rd October 2024.

⁸ Version 1.0, adopted on the 8th October 2024, paragraph 54, example 6.

18. The EDPB has confirmed the restrictive interpretation of article 9(2)(e) of the Regulation in its “Report of the work undertaken by the ChatGPT Taskforce”, adopted on the 23rd May 2024, where it stated that:

“Regarding the processing of special categories of personal data, one of the exceptions of Article 9(2) must be applicable in addition, for the processing to be lawful. In principle, one of these exceptions can be Article 9(2)(e) GDPR. However, the mere fact that personal data is publicly accessible does not imply that “the data subject has manifestly made such data public”⁹ [emphasis has been added].

19. Having said that, the Commissioner notes that the processing does not relate to special categories of personal data. Accordingly, the controller cannot rely on any exception under article 9(2) of the Regulation, as the personal data in question does not fall within any of the categories listed in article 9(1) of the Regulation. Even assuming that the personal data in question could be classified as a special category of personal data, the controller would still be unable to rely on that exception, since the complainant had not manifestly made public her residential address and identity card number.
20. After the Commissioner’s initial communication, the controller took appropriate corrective action by removing the post that published the “*Change in directors or company secretary or legal representation of a company*” pertaining to [REDACTED]. Notwithstanding this, the controller maintained that he had a legitimate interest in processing the personal data of the complainant. For this reason, the controller chose to retain the email exchanged between the parties on the 9th September 2025, while redacting the complainant’s email address and mobile number.

Email dated the 9th September 2025 that has been exchanged between the parties

21. The controller published on his Facebook profile an email sent to him by the complainant on the 9th September 2025, in which she offered to facilitate a meeting with the [REDACTED]. The email included the complainant’s email address, mobile number, and a brief description of the complainant’s role within a media strategy company established in Malta. Despite the fact that the controller subsequently redacted the email address and mobile number

⁹ Paragraph 18.

from the original post, the complainant maintained that the content of the email still related to her.

22. When requested to specify the legal basis for publishing the personal data pertaining to the complainant, the controller submitted that the data were published in accordance with article 6(1)(f) of the Regulation. The controller justified the publication on the basis that:

“The data was published in the context of an ongoing debate on the propriety of the complainants’ and my client’s position on a matter of public interest, namely the manner in which my client was able to communicate his views on a matter of public interest and the extent to which the complainants were empowered and/or properly entitled to place constraints on my client in this regarding”.

23. As supporting documentation, the controller submitted the Commissioner with a Facebook post that he published earlier on his Facebook profile on the 25th September 2025, and argued that the email, which is the subject of the complaint, was published only to support his allegation that the controller may have used undue influence within [REDACTED] to stop him from discussing matters in relation to [REDACTED] on a radio programme broadcasted on [REDACTED]. In a Facebook post dated the 25th September 2025, the controller wrote that:

[REDACTED]

24. The Commissioner also examined the counterarguments of the complainant, in which the complainant strongly refuted the claims of the controller and stated that this *“wild claim is entirely untrue and defamatory, and he [the complainant] made absolutely no attempt to verify it”*. In addition, the complainant submitted that the controller is attempting to justify the processing of the complainant’s personal data on the basis of public interest, however, the concept of public interest does not extend to personal disputes or professional rivalries.
25. Before entering into the merits of this allegation, the Commissioner clarifies that he does not have the competence to determine the veracity of the allegations made and his competence is strictly limited to establish whether the controller had a legitimate interest in processing the

personal data of the complainant pursuant to the requirements set forth in article 6(1)(f) of the Regulation.

26. Article 6(1)(f) of the Regulation provides that the processing is lawful where the controller effectively demonstrates that the:

“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”.

27. According to the settled case-law of the Court of Justice of the European Union (the “CJEU”), the processing of personal data must meet three (3) cumulative conditions¹⁰: (a) first, the pursuit of a legitimate interest by the controller or by a third party; (b) second, the need to process personal data for the purposes of the legitimate interest(s) pursued; and (c) third, the interests or fundamental freedoms and rights of the concerned data subjects do not take precedence over the legitimate interest(s) of the controller or of a third party.

28. The Commissioner notes that the controller asserted that the legitimate interest underlying the processing was to inform the public about an ongoing debate concerning the propriety of both the complainant’s and the controller’s positions on a matter of public interest. The Commissioner referred to the ‘Guidelines 1/2024 on processing of personal data based on Article 6(1)(f) GDPR’¹¹, in which the EDPB defined an “interest” as “*the broader stake or benefit that a controller or third party may have in engaging in a specific processing activity. For example, a controller may have an interest in promoting its products, whereas this interest may be advanced by processing personal data for direct marketing purposes*”¹².

29. There is no exhaustive list of interests that may be considered legitimate. In the absence of a definition of “interest” within the Regulation, a wide range of interests can, in principle, be regarded as legitimate. The EDPB Guidelines 1/2024 list the following examples as to what may constitute a legitimate interest for the purposes of article 6(1)(f) of the Regulation: “*having access to information online, ensuring the continued functioning of publicly accessible websites, obtaining the personal information of a person who damaged someone’s property in order to*

¹⁰ C-13/16, *Rīgas satiksme v. Valsts datu inspekcija*, ECLI:EU:C:2017:336

¹¹ Version 1.0, adopted on the 8th October 2024.

¹² Paragraph 14 of the EDPB Guidelines 1/2024.

sue that person for damages, protecting the property, health and life of the co-owners of a building, product improvement, and assessing the creditworthiness of individuals”¹³.

30. The EDPB Guidelines 1/2024 provide the following cumulative criteria that must be met for the interest to be considered as “legitimate”: (a) the interest is not contrary to EU or national law; (b) the interest is clearly and precisely articulated; and (c) the interest is real and present, and not speculative¹⁴. With regard to the third criterion, the CJEU held that a legitimate interest must exist and be present at the time of the processing and must not be hypothetical. In this context, the CJEU held that:

*“In that regard, it must be found that, as the Romanian and Czech Governments, Ireland, the Austrian Government, the Portuguese Government and the Commission have argued, since, in accordance with Article 7(f) of Directive 95/46, the controller responsible for the processing of personal data or the third party to whom those data are disclosed must pursue legitimate interests justifying that processing, **those interests must be present and effective as at the date of the data processing and must not be hypothetical at that date.**”¹⁵ [emphasis has been added].*

31. In connection with this, the Commissioner proceeded to assess whether the interest sought by the controller satisfies the criteria established by the CJEU case-law and the EDPB Guidelines. To this end, the Commissioner referred to the supporting documentation submitted by the complainant on the 28th October 2025, which included a Facebook post published by the controller entitled [REDACTED]. The conclusion of this public statement published by the controller reads as follows:



¹³ Paragraph 16 of the EDPB Guidelines 1/2024.

¹⁴ Paragraph 17 of the EDPB Guidelines 1/2024.

¹⁵ Case C-708/18 *Asociația de Proprietari Bloc M5A-Scara A* [2019] ECLI:EU:C:2019:1064.

32. The Commissioner notes that the public statement published by the controller in relation to the matter surrounding the complaint conveys a personal suspicion rather than a verified fact. In accordance with article 6(1)(f) of the Regulation, for a legitimate interest to constitute a lawful basis for processing, it must be real, present, and not speculative. An interest founded on unsubstantiated allegations, such as the controller's own statement which he himself describes as "[m]y *strong suspicion*", cannot satisfy this requirement. Consequently, the asserted legitimate interest remains unsupported and cannot serve as a valid lawful basis for the processing of the complainant's personal data.

On the basis of the foregoing considerations, the Commissioner is hereby deciding that the controller did not manage to effectively demonstrate the lawfulness of the processing of any of the complainant's personal data, and this, therefore, infringes the principle of lawfulness and article 6(1) of the Regulation.

By virtue of article 58(2)(b) of the Regulation, the Commissioner is hereby serving the controller with a reprimand for infringing the provisions of the Regulation and warned that in the event of a repetitive infringement of a similar nature, the Commissioner will proceed with the appropriate corrective action.

The Commissioner has taken note that the controller had, of his own accord, already decided to take the appropriate corrective action by removing the post that contained the notification in relation to the change in directors pertaining to [REDACTED] and redacting the email address and mobile number of the complainant from the email communication dated the 9th September 2025.

In terms of article 58(2)(g) of the Regulation, the Commissioner is hereby ordering the controller to remove the personal data pertaining to the complainant, namely, the post in which he published a copy of the email sent by the complainant to the controller on the 9th September 2025.

Ian
DEGUARA
(Signature)

Digitally signed
by Ian DEGUARA
(Signature)
Date: 2025.11.07
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**Ian Deguara
Information and Data Protection Commissioner**

Right of Appeal

The parties are hereby being informed that in terms of article 26(I) of the Data Protection Act (Cap. 586 of the Laws of Malta), any person to whom a legally binding decision of the Commissioner is addressed, shall have the right to appeal to the Information and Data Protection Appeals Tribunal within twenty (20) days from the service of the said decision as provided in article 23 thereof¹⁶.

An appeal to the Tribunal shall be made in writing and addressed to *"The Secretary, Information and Data Protection Appeals Tribunal, 158, Merchants Street, Valletta"*.

¹⁶ Further information on the appeals procedure is available on this Office's website at the following hyperlink: <https://idpc.org.mt/appeals-tribunal/>.