

PCS Participant Privacy Notice

As an operator of Professional Competence Schemes (PCS), RCPI in the course of fulfilling its contractual, statutory and administrative obligations, processes personal data relating to those who come in contact with the organisation, which includes PCS participants.

Throughout the course of your participation in a Professional Competence Scheme, RCPI processes (i.e. collects, uses and stores) your personal data. This data is collected from you directly, the participant.

We are committed to ensuring that the personal data of our PCS participants is handled in accordance with the principles set out in the GDPR. This Privacy Notice sets out, for PCS participants, what to expect when RCPI collects personal information about you, and explains the following:

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How does RCPI collect personal data about you?

Throughout the course of your participation in a Professional Competence Scheme with RCPI, we collect personal data that you provide when you apply for a scheme, when you attend RCPI CPD accredited events and when you update your electronic PCS Portfolio.

What type of data does RCPI hold about you?

When you participate in a Professional Competence Scheme, we will collect, use and store personal data about you, which includes:

- Name
- Email Address
- DOB
- Gender
- Address
- Professional Award Details
- Medical Council Registration Number
- Specialty/sub-specialty
- Place of employment

How will RCPI use your personal data?

We will use the personal data we collect about you to:

- Process your application for the Professional Competence Scheme
- Manage your participation in the Professional Competence Scheme (billing, issuing your Annual Statement, validating absence from medical practice etc)
- Store your records of CPD activities
- Send you information about learning and development opportunities, updates relating to your area of practice, updates about RCPI's broader activities and RCPI Newsletters

Your personal data will be included in:

- The Annual Verification Process which is a sample audit to assess compliance with Professional Competence Scheme Requirements
- Mandatory Reports to the Medical Council

What is the legal basis in GDPR for RCPI’s processing your personal data?

The legal bases for the RCPI’s processing your personal data are:

- **Contract:** it is necessary for RCPI to process your personal data to facilitate your participation in the Professional Competence Scheme
- **Legal Obligation:** it is necessary for RCPI to process your personal data to comply with its legal obligations as set out in its Arrangement with the Medical Council arising from Section 91(4) of the Medical Practitioners Act
- **Legitimate Interest:** it is a legitimate interest of RCPI to process PCS participant data with a view to improving its administration and operation of its business and to promote its offering

With whom will RCPI share your personal data?

Whilst you are participating in a Professional Competence Scheme your personal data will be shared with the Medical Council for the purposes of Mandatory Reporting on RCPI’s operation of the Professional Competence Scheme

RCPI engages third party service providers to provide various ICT services to RCPI as set out below. RCPI has Data Processing Agreements in place with these providers to ensure that they have taken appropriate technical and organisational measures to process, store, and safeguard your personal data:

Recipient	Purpose of processing	Lawful basis	Personal data collected by the third party	Privacy Policy
Azure	To allow you to access RCPI Digital Services via RCPI’s Digital Hub which is hosted on Azure (Microsoft’s Cloud Computing Service)	Contract	RCPI ID Name Gender Email Address Phone number User ID Password	Link
Cvent	Cvent is an online webinar platform. If you attend RCPI CPD accredited events via Cvent your CPD credits are automatically uploaded to your electronic PCS Portfolio	Contract	Name Email Mobile Photo (optional) Location (optional free text) Job Title (optional)	Link <i>Cont.</i>

Recipient	Purpose of processing	Lawful basis	Personal data collected by the third party	Privacy Policy
Ellucian	To create your account in the Learner Management System	Contract	Name Address Phone Number Email Date of Birth Gender	Link
EirEvo	RCPI's Managed IT Service	Legitimate Interest	RCPI ID Name Address Phone Number Email Date of Birth Gender	Link
Freshworks	Customer service portal and task tracker	Legitimate Interest	RCPI ID Name Email Mobile Phone Number Work Phone Number Record of Interactions	Link
risr/	Electronic Portfolio for you to record CPD activities	Contract	RCPI ID Name Email User ID Password Intake Year & Specialty	Link
Intuit Mailchimp	A marketing automation platform and email marketing service	Legitimate Interest*	RCPI ID Name Email	Link

*We always include an unsubscribe button in our communications so you can opt out of receiving such communications at any time. RCPI commits to not processing your personal data where these legitimate interests are overridden by your own interests.

Will RCPI transfer your personal data outside the European Economic Area?

If we transfer personal data relating to a service provider located in a country outside the EEA, we shall safeguard the transfer of this personal data by ensuring that we have European Commission approved standard contractual clauses in place with the provider.

How will RCPI store your personal data and keep it safe?

RCPI has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Access to your personal data is limited to those who have a business need-to-know. They will only process your personal data on our specific instructions and they are subject to a duty of confidentiality.

There are established procedures to deal with any suspected data security breach and to notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How long will RCPI retain your personal data?

RCPI will retain your personal data related to Professional Competence Schemes in accordance with the Medical Council retention policy for 6 years

Will applicants be subject to profiling or automated decision making?

Profiling means the automated processing of personal data to evaluate certain things about an individual. RCPI does not use any means of individual profiling.

Automated individual decision-making is when an organisation makes a decision solely by automated means without any human involvement. RCPI does not use any automated decisions making.

What are your rights in relation to your personal data?

Under the GDPR you have the following rights in relation to your personal data:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

How can you raise a query or complaint about the use of your personal data?

You can address any questions or concerns about the use of your personal data with the RCPI Data Protection Officer using the contact details below.

If you are unhappy with the RCPI's handling of your personal data or believe that the requirements of the data protection legislation are not being complied with and the issue has not been resolved to your satisfaction by RCPI, you also have the right to submit a complaint to the Data Protection Commissioner using the contact details below

RCPI Data Protection Officer	Data Protection Officer
RCPI, 4 th Floor Frederick House, 19 Frederick Street South, Dublin 2 D02 X266	Data Protection Commissioner, 21 Fitzwilliam Square South Dublin 2 D02 RD28
Phone: 01 8639700	Phone: 01 7650100
Email: dataprotectionofficer@rcpi.ie	https://www.dataprotection.ie/en/contact/how-contact-us