

Exam Candidate Privacy Notice

As a provider of membership examinations in General Medicine, Paediatrics, Obstetrics and Gynaecology, Public Health Medicine and Occupational Medicine, 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 RCPI Exam Candidates.

When you apply for an RCPI Examination, RCPI processes (i.e. collects, uses and stores) your personal data which is provided directly by you the Exam Candidate.

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

[How does RCPI collect personal data about you?](#)

[What type of data does RCPI hold about you?](#)

[How will RCPI use your personal data?](#)

[What is the legal basis in GDPR for RCPI's processing your personal data?](#)

[With whom will RCPI share your personal data?](#)

[How will RCPI store your personal data and keep it safe?](#)

[Will RCPI transfer your personal data outside the European Economic Area?](#)

[How long will RCPI retain your personal data?](#)

[Will applicants be subject to profiling or automated decision making?](#)

[What are your rights in relation to your personal data?](#)

[How can you raise a query or complaint about the use of your personal data?](#)

How does RCPI collect personal data about you?

When you apply for an RCPI Examination, we collect personal data provided by you, the Exam Candidate, via the online application form.

What type of data does RCPI hold about you?

When you apply for an RCPI Examination, we will collect, use and store personal data about you, which includes:

- RCPI ID
- Title
- First Name
- Middle Name
- Surname
- Date of Birth
- Address
- Post Code
- Email
- Mobile
- Nationality
- Place of employment
- Gender
- Photo
- Copy of Degree
- Portfolio/ Thesis, where applicable

How will RCPI use your personal data?

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

- Verify your application
- Add you to a waitlist for a place in the exam if required
- Plan logistical/ location requirements for Clinical Exams
- Manage allocation of candidates to Clinical Exam sites
- Provide you with access to RCPI Resources for Exams Candidates
- Communicate with you about the examination
- Organise and conduct the examination
- Generate examination results and organise the conferring ceremony

- Facilitate appeals
- Send you information about learning and development opportunities, updates relating to your area of practice, updates about RCPI's broader activities and RCPI Newsletters

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 sitting an RCPI Examination
- **Legal Obligation:** it is necessary for RCPI to process your personal data to comply with its legal obligations
- **Legitimate Interest:** it is a legitimate interest of RCPI to process Exam Candidate 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?

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 |
| Codec | To allow you to access RCPI Digital Services via the authentication process of RCPI's Digital Hub | Contract | RCPI ID Name Gender Email Address Phone number User ID Password | Link |
| D2L | To provide you with access to RCPI's Virtual Learning Environment where you can access RCPI Resources for Exam Candidates | Contract | Name Email User ID Username | Link |

Cont.

| 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 |
| Intuit Mailchimp | A marketing automation platform and email marketing service | Legitimate Interest* | RCPI ID Name Email | Link |
| Test Reach | To allow you to take examinations that are delivered by remote invigilation, via Test Reach's remote invigilation platform | Contract | RCPI ID Name Email Date of Birth Phone number | 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 in accordance with the RCPI Data Retention Policy

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 |