

## IMGTI Trainee Privacy Notice

As a provider of post-graduate medical training, RCPI in the course of fulfilling its legal and administrative obligations, processes personal data relating to those who come in contact with the organisation, which includes IMGTI Trainees.

Throughout the course of your programme, RCPI processes (i.e. collects, uses and stores) your personal data. This data is collected mainly from you directly, but it may also come from other sources e.g. from your Trainer.

We are committed to ensuring that the personal data of our IMGTI Trainees is handled in accordance with the principles set out in the GDPR. This Privacy Notice sets out, for Trainees, 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 Training Programme with RCPI, we collect personal data about you from the following sources:

- You, the Applicant/ Trainee
- Your Trainers, Regional Programme Directors, National Specialty Directors and International Clinical Lead
- Your named referees
- Members of panels for interviews, assessments and appraisals
- HSE, National Doctors Training and Planning Unit

The Forum of Irish Postgraduate Medical Training Bodies

### What type of data does RCPI hold about you?

When you apply for a place on an IMGTI Programme, we will collect, use and store personal data about you, which may include:

- RCPI ID
- Name
- Gender
- Date of birth
- Nationality
- Address
- Telephone number
- Email address
- Education and qualifications
- Medical Professional Registration
- Irish Medical Council Number
- Employment history
- Professional memberships
- Publication details
- Financial Sponsorship Guarantee
- Personal data you have provided to us during interviews whether online or face-to-face
- Any personal data provided to us about you by your referees which will include dates of previous employment and performance during previous employment

If you are successful in your application for a place on the Fully Sponsored Programme, RCPI will offer to process the following documents to organise your residency and professional requirements. Your explicit consent will be requested prior to processing these documents:

- Passport Photocopy
- Atypical Working Visa
- Police Clearance Certificate

As you progress through an IMGTI Programme, RCPI will continue to collect, use and store information about your:

- Training activities
- Performance appraisal
- Training/ employment location
- Feedback about the Training Programme

#### How will RCPI use your personal data?

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

- Process your application for the Training Programme
- Organise your Medical Council Registration
- Organise your atypical permissions to be in the state
- Keep the HSE informed of your working locations
- Set up your access to RCPI Digital Services
- Organise and manage your training placements
- Organise and manage your attendance at mandatory training courses and study days
- Assess your progress on the Programme
- Communicate with you about the Programme
- Manage Programme leave
- Record and certify your completion of the Programme
- 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 participation in the Training Programme
- **Legal Obligation:** it is necessary for RCPI to process your personal data to comply with its legal obligations
- **Public Interest** It is necessary for RCPI to provide programme participant status reports to the HSE NDTP to facilitate medical workforce planning.
- **Legitimate Interest:** it is a legitimate interest of RCPI to process trainee data with a view to improving its administration and operation of its business and to promote its offering
- **Consent:** RCPI will only process 'Special Category' or sensitive data with your explicit consent

### With whom will RCPI share your personal data?

Throughout the course of your Scholarship/ Fellowship Programme with RCPI, your personal data will be shared with:

- Medical Manpower departments in Training Sites/ Hospitals to facilitate your employment arrangements
- HSE, National Doctors Training and Planning Unit to maintain the centralised recording of doctors' Medical Council Registration and location
- Irish Immigration Service (INIS) to organise your atypical permissions to be in the state
- Irish Forum of Training Bodies who run the Operational Committee for international sponsored programmes and along with the HSE, NDTP maintain the full list of all international trainees in Ireland
- Irish Medical Council to facilitate the statutory oversight obligations of the Medical Council.

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
<b>UniHaven (Cambridge Education Group)</b>	To put you in contact with a concierge service with the required expertise to assist with your personal and professional move to Ireland	Legitimate Interest	Name Address Email Phone Number	<a href="#">Link</a>
<b>Azure</b>	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	<a href="#">Link</a>
<b>Cvent</b>	To provide you with access to online webinars	Contract	Name Email Mobile Photo (optional) Location (optional free text) Job Title (optional)	<a href="#">Link</a>
<b>D2L</b>	To provide you with access to RCPI's Virtual Learning Environment where you can access your Mandatory Training Courses	Contract	Name Email User ID Username	<a href="#">Link</a>
<b>Ellucian</b>	To create your account in the Learner Management System	Contract	Name Address Phone Number Email Date of Birth Gender	<a href="#">Link</a>
<b>Presidio</b>	RCPI's Managed IT Service	Legitimate Interest	RCPI ID Name Address Phone Number Email Date of Birth Gender	<a href="#">Link</a>        <i>Cont.</i>

Recipient	Purpose of processing	Lawful basis	Personal data collected by the third party	Privacy Policy
<b>Freshworks</b>	Customer service portal and task tracker	Legitimate Interest	RCPI ID Name Email Mobile Phone Number Work Phone Number Record of Interactions	<a href="#">Link</a>
<b>rivr/</b>	Electronic Portfolio for you to record training activities	Contract	RCPI ID Name Email User ID Password Intake Year & Specialty	<a href="#">Link</a>
<b>Intuit Mailchimp</b>	A marketing automation platform and email marketing service	Legitimate Interest*	RCPI ID Name Email	<a href="#">Link</a>

\*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

<b>RCPI Data Protection Officer</b>	<b>Data Protection Officer</b>
RCPI, 4 <sup>th</sup> 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: <a href="mailto:dataprotectionofficer@rcpi.ie">dataprotectionofficer@rcpi.ie</a>	<a href="https://www.dataprotection.ie/en/contact/how-contact-us">https://www.dataprotection.ie/en/contact/how-contact-us</a>