

## Short Course, Certificate & Diploma Participants Privacy Notice

As a provider of post-graduate medical training, 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 participants on the short courses, certificates and diplomas it provides.

Throughout the course of your course, certificate or diploma, 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 as explained further on in this document.

We are committed to ensuring that the personal data of our course, certificate and diploma participants is handled in accordance with the principles set out in the GDPR. This Privacy Notice sets out, for 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 short course, certificate or diploma with RCPI, we collect personal data about participants from the following sources:

- You, the participant
- Your supervisor or colleague if you are part of a team applying for a team-centred programme
- RCPI's medical education technology partner, called 'iheed', who process expressions of interest and applications for a selection of RCPI programmes

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

When you apply for a place on a short course, certificate or diploma, we may collect, use and store the following personal data about you:

- First name, surname and title
- Gender
- Date of birth
- Address
- Telephone number
- Email address
- Education and qualifications
- Medical Council Registration Number
- Employment details
- Referees

If you are a participant in the Continuous Professional Development Support Scheme (CPD-SS) we will also collect, use and store the following personal data about you:

- Name
- Email address
- NCHD or not
- Employment details (location, specialty, training status, seniority)

### How will RCPI use your personal data?

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

- Process your application for the course, certificate or diploma
- Communicate with you about the course, certificate or diploma
- Record and issue certification for the completion of programme, where applicable
- Send RCPI newsletters and updates about RCPI's broader activities

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

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

- **Contract:** it is necessary for RCPI to process your personal data to facilitate your participation in the short course, certificate or diploma
- **Legal Obligation:** it is necessary for RCPI to process your personal data to comply with its legal obligations, for QQI accredited programmes, as set out in the Qualifications and Quality Assurance (Education and Training) Act
- **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 offerings

With whom will RCPI share your personal data?

If you are participating in a sponsored programme (e.g. by your employer or the HSE) your personal data may be shared with the sponsor for arranging payment for the programme and to enable to the sponsor to maintain a record of the skills of their workforce.

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>Arachas</b>	To provide Learner Protection Insurance for participants in QQI accredited programmes	Contract Legal Obligation	Name Email Address	<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>

Recipient	Purpose of processing	Lawful basis	Personal data collected by the third party	Privacy Policy
<b>D2L</b>	To provide you with access to the Virtual Learning Environment	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>EirEvo</b>	RCPI's Managed IT Service	Legitimate Interest	RCPI ID Name Address Phone Number Email Date of Birth Gender	<a href="#">Link</a>
<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>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>