

## RCPI Web Services Privacy Notice

The Royal College of Physicians of Ireland (“RCPI”, “we”, “our”) offers many products and digital services (“Services”) which can be accessed when you log-in to the RCPI website.

Examples of such services are:

- Booking a place at a course or event
- Applying to a training programme
- Consuming educational materials
- Maintaining your training record using ePortfolio
- Maintaining your record of Professional Competence using ePortfolio
- Paying subscriptions

Please read this policy in conjunction with our [Terms of Use](#). By using our Services, you are agreeing to these terms.

We respect your right to privacy and our obligation to comply with the General Data Protection Regulation (2016/679).

This Privacy Notice explains how we collect, use, store and share your personal data:

- [Information we collect](#)
- [How we use your information](#)
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## RCPI Web Services Privacy Notice

### Information we collect

#### Information you give us

If you wish to use our digital services, you need to register for an RCPI Account. During registration you will be asked to provide personal information such as your name, date of birth, gender and email address.

#### Information we get from your use of our services

##### *Device Information:*

We may collect device-specific information such as your hardware model, operating system version, mobile network information

##### *Log Information:*

We may collect server log information (like your search queries and how you used our services), system activity (like the time and date of your requests), events (like crashes), hardware settings, browsers type, browser language and your IP address.

##### *Local Storage:*

To facilitate the off-line provisions of our Services, we collect and store information (including personal information) from your device using mechanisms such as browser web storage (including HTML 5), application data caches and cookies.

### How we use your information

#### How we use information we collect

The personal data used for the creation of your RCPI Account, will be used to create a RCPI User Profile and give you access to services appropriate to your profile.

We use the information we collect from all of our Services to provide, maintain, protect and improve them, to develop new ones and to protect RCPI and our users. We also use this information to give you more relevant search results and to match the relevant digital services to you profile.

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RCPI's service providers, as Data Processors, may use the information you supply to help to provide you with a better service, and in particular to:

- Increase performance of their service and improve user navigation
- Facilitate internal record keeping and to improve efficiency or costs
- Provide information to RCPI in support of legitimate operational and regulatory requirements

The purpose for which we collect Personal data is usually stated on the webpage where the information is requested and should be self-explanatory. However, if you have any specific queries about the purpose for which your information is to be used, you can email your query to [dataprotectionofficer@rcpi.ie](mailto:dataprotectionofficer@rcpi.ie)

Personal information will not be retained for longer than it is required and once the initial purposes for gathering the information have become irrelevant the information will not be retained.

### How we store your information

Your personal data is held on our secure servers, our partners' secure servers or our service providers' secure servers. In line with our obligations under the General Data Protection Regulation (2016/679), we have implemented contractual measures to ensure that our partners and contractors comply with their data protection obligations while processing your Personal data. The following include but are not limited to our partner services:

- Our website and Digital Hub is hosted by Microsoft and the data for the system is stored by them in a central database
- ePortfolio for Professional Competence is hosted by a company called 'risr/' and the data for the system is stored by them
- ePortfolio for Training is hosted by a company called 'risr/' and the data for the system is stored by them
- Our booking/purchasing service is hosted by Course Merchant a partner service of Desire2Learn (D2L) and the data for the system is stored by them
- RCPI Brightspace is hosted by D2L and the data for the system is stored by them.
- Our user authentication application is hosted by Ellucian Ireland and the data for the system is stored by them.
- Data is transferred between different systems using applications that are hosted by Amazon Web Services and Microsoft Azure and data is cached within this service.

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- Our Computer Based Testing is hosted by Test Reach and the data for the system is processed by them.
- Realex Payments Gateway, which is governed by the Irish Payments Services Organisation, is a service which allows you to process your payments. We do not store your credit card details.
- Cvent (Our event Platform) uses Stripe (Payment gateway) Stripe service is provided in Europe through Stripe Payments Europe Limited, registered in Ireland.

### How we share your information

We will not share your personal information with third parties except where we have received your explicit and informed consent to do so, or where one of the following circumstances apply:

#### For data processing

We provide personal information to our service partners to process it for us. This processing must be based on our instructions, in compliance with our Privacy Statement and any other appropriate confidentiality and security measures.

#### For legal reasons

We will share personal information with third parties if we believe in good faith that we are required to disclose it in order to:

- Comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other statutory requirement. Where Personal data is sought from us in the context of any statutory or non-statutory investigation or enquiry (e.g. by the Medical Council, a Hospital or by the HSE in the context of a malpractice or disciplinary investigation) we will assess the request on its merits having regard to the legitimate interests of RCPI, the public interest and the interests of the data subjects concerned.
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security or technical issues.

We may share aggregated anonymised information publicly as well as with our partners. For example, we may share information publicly to show trends about the general use of our Services.

We reserve the right to transfer information (including your Personal data) to a third party in the event of a re-organisation of RCPI or a transfer of all or substantially all of the assets of RCPI (whether by dividing, merging or transferring its business between two or more bodies, or subcontracting or outsourcing same or otherwise) provided that any relevant third party agrees to adhere to the terms

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of this, or a similar, Privacy Statement and provided that the third party only uses your Personal data for the purposes that you provided it to us.

### Security of your information

We work hard to protect RCPI and our users from unauthorised access to or unauthorised alteration, disclosure or destruction of information we hold.

We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems.

We restrict access to personal information to RCPI administrators, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

We hold your personal data on our servers or our service providers' servers which are all secure servers. However, no data transmission over the Internet can be guaranteed to be 100% secure and, as such we cannot guarantee the security of any information you transmit to us via the Internet. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your personal data.

### International transfers

Some of our partners or service providers, or technology vendors may transfer information outside of EEA into jurisdictions where privacy laws, obligations and rights may vary. For such transfers, we will always ensure that we have European Commission approved standard contractual clauses in place with the provider.

### Data Subjects' Rights

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.

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- **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.

## Raise a Query or Complaint

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 <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>