



AIHPC

All Ireland Institute of
Hospice and Palliative Care

TITLE: Data Protection Privacy Policy	REFERENCE NO: ADM 004.1
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DESCRIPTION

TITLE: Data Protection Privacy Policy

DATE: 25th May 2018

APPROVAL

APPROVED BY: Karen Charnley
Director, AIHPC

SIGNATURE:

DATE: 25th May 2018

CONTROL DATES

EFFECTIVE FROM: May 2018

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Introduction

All Ireland Institute of Hospice and Palliative Care (AIHPC) is committed to protecting the privacy of all who come into contact with our organisation, and takes its responsibility regarding the security of our partners and stakeholders very seriously. We will be clear and transparent about the information we are collecting what we will do with that information.

This Policy sets out the following:

- What personal data we collect and process about you in connection with your relationship with us a partner, stakeholder, researcher, voices4care member, professional, member of the public, contractor, student, supplier, former and prospective employees, employees' next of kin
- What we do with that data
- How we store the data and for how long
- Who we transfer/disclose that data to
- How we deal with your data protection rights
- And how we comply with the data protection rules

All personal data is collected and processed in accordance with Irish and EU data protections laws.

Data Controller

All Ireland Institute of Hospice and Palliative Care (referred to as 'AIHPC') in this policy primarily refers to AIHPC as the 'data controller' of all personal information that is collected and used about you ('you' refers to all who come into contact with the Institute i.e. partners, researchers, professionals, Voices4Care members, members of the public, contractors, suppliers, former and prospective employees; employees' next of kin) for the purposes of the Irish Data Protection Act 2018. AIHPC is registered under the umbrella of Our Lady's Hospice & Care Services with the Companies Registration Office (company registration number 352404) and with the Charities Regulatory Authority (Charities registration number CHY 1144).

This policy should help you to better understand how we use your personal information, it explains in details the types of personal information we collect, what we use it for and who we may share it with. If you have any further questions about this policy or how we handle your personal information, which are not dealt with here, please get in touch with us by writing to our Data Protection Officer at AIHPC, Education & Research Centre, Our Lady's Hospice, Harold's Cross, Dublin 6W / Tel 01 4912948.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What Data we Collect:

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, and information provided to us for the purposes of carrying out the business of the Institute, all of which are included in this [table](#).

What do we use your personal data for:

AllHPC only collects personal data for a specific purpose, in compliance with legislation, and the various reasons are outlined in this [table](#).

Security of your personal data:

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage. The data you provide to us is protected using TLS (Transport Layer Security) technology. TLS is the industry standard method of encrypting personal information and so that they can be securely transferred over the Internet.

We may disclose your information to trusted third parties for the purposes set out in this Privacy Policy. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with Irish and EU law on data protection rules.

Data Protection Officer:

We have appointed a Data Protection Officer (“DPO”) to oversee compliance with this policy. In addition, you always have the right to make a complaint at any time to a supervisory authority. The Irish Data Protection Commissioner is the lead data protection supervisory authority for AllHPC as an Irish data controller.

Your Data Protection Rights:

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** – Article 17 of GDPR deals with the right to erasure. The right to erasure is not an absolute right and restrictions may apply. This would need to be examined on a case-by-case basis. The right to erasure does not apply if processing is necessary for one of the following reasons:

1. to comply with a legal obligation
2. for archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing; or
3. for the establishment, exercise or defence of legal claims
4. if the processing is necessary for public health purposes in the public interest (eg protecting against serious cross-border threats to health, or ensuring high standards of quality and safety of health care and of medical products or medical devices);
5. or if the processing is necessary for the purposes of preventative of occupational medicine (eg where the processing is necessary for the working capacity of an employee; for medication diagnosis; for the provision of health or social care; or for the management of health or social care systems or services). This only applies where the data is being processed by or under the responsibility of a professional subject to a legal obligation of professional secrecy (eg. health professional).

- **Rights to restriction of Processing** – Article 18 of GDPR deals with the right to restriction of processing. Where
- **Object to automated decision-making including profiling**, AllHPC does not use automated decision-making or automated profiling services.
- **Request transfer** of your personal information in an electronic and structured form to you or to another party (commonly known as a right to “data portability”). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
- **Withdraw consent** in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another another legitimate basis for doing so in law. You can withdraw your consent to our use of your personal data through info@aiihpc.org