



# AIIHPC

All Ireland Institute of  
Hospice and Palliative Care

<b>TITLE:</b> Website Privacy Notice	<b>REFERENCE NO:</b> ADM 004.1
<b>AUTHOR:</b> Paula Pinto	<b>REVISION NO:</b> 2
<b>APPROVED BY:</b> Karen Charnley	<b>EFFECTIVE FROM:</b> January 2022
<b>REVIEW DATE:</b> January 2024	<b>Pages</b> 9

## DESCRIPTION

**TITLE:** Website Privacy Notice

**AREA:** Data Protection

**REFERENCE:** ADM 004.1

## CREATION

**AUTHOR:** Paula Pinto

Programme Manager, AIIHPC

**SIGNATURE:**

## APPROVAL

Karen Charnley

Director, AIIHPC

**APPROVED BY:**

**SIGNATURE:**

## CONTROL DATES

**EFFECTIVE FROM:** January 2022

**REVIEW DATE:** January 2014

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### **What is the purpose of the Privacy Statement?**

All Ireland Institute of Hospice and Palliative Care (AIIHPC). AIIHPC is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the applicable data protection legislation (including the Irish Data Protection Acts 1988 and 2003, European Union Data Protection Directive 1995 and the General Data Protection Regulations, referred to as the “GDPR”).

AIIHPC is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This Privacy Statement applies to the processing of Personal Data collected by us when you:

- Visit our websites; (aiihpc.org)The Palliative Hub (thepalliativehub.com) and its component sites:
  - Children and Young People (www.childrenspalliativehub.com)
  - Adult (www.adultpalliativehub.com)Learning Platform (learningplatform.thepalliativehub.com) - as well as the user accounts created in the Learning Platform.
  - Professional (www.professionalpalliativehub.com)
  - Carers (<http://www.carers.thepalliativehub.com>);
- Visit our branded social media pages;Visit our offices;
- Receive communication from us or otherwise communicate with us, including but not limited to emails, phone calls, texts or faxes;
- Use our products and services as an authorised user (for example, as an employee of one of our service users who provided you with access to our services) where we act as a controller of your Personal Data;
- Register for, attend or take part in our events, webinars or programs;
- Participate in surveys, research or other similar data collection facilitated by us.

Our websites and services may contain links to other websites, applications, platforms and services maintained by third parties. The information practices of these third parties, including the social

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media platforms that host our branded social media pages, are governed by their privacy statements, which you should review to better understand their privacy practices.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

**It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.**

#### **Data protection principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

#### **The kind of information we hold about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

*Contact and communications information*, such as:

- Your contact details
- Your communication preferences
- Records of communications and interactions we have had with you

*Biographical information*, such as:

- Your name, gender, nationality and date of birth
- Your professional activities and employment, including work contact details

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**How is your personal information collected?**

We collect most of the personal information about you through information you provide with your mailing lists subscriptions and/or registration through the Palliative Hub Learning Platform.

**How we will use information about you and the legal basis for processing your data under the GDPR**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you or in order to take steps at your request prior to the entry into a contract.
2. Where we need to comply with a legal obligation
3. Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.
4. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
5. Where it is necessary in order to protect your vital interests or someone else’s vital interests.
6. Where you have consented to the processing.

**Situations in which we will use your personal information**

We need all the categories of information in the list above (see ‘The Kind of information we hold about you’) primarily to allow us to perform our contract with you, as part of a process in providing you a service which you have requested and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of ours, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

This data is used by AIIHPC to support a full range of activities for and in relation to our supporters. These include:

- Providing you with information about our work and our activities. This might include sending you publications, e-newsletters, and invitations to events.
- Conducting surveys, focus groups and other research.
- Internal record keeping, including the management of any feedback or complaints.
- Administrative purposes e.g. an event you have registered for or attended.
- To send you our newsletter or information about the work of AIIHPC, see ‘Mailing list’ below.

**Mailing list**

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AIIHPC provide emails about stories, events, relevant publications, research opportunities, open consultations / survey opportunities, job opportunities, education and training opportunities, and newsletters. The below information explains how we use your personal data when you sign up to our mailing list.

### **Why we process your information**

If you opt-in to receiving emails, we will ask for your:

- first and last name
- email address

Our legal basis for processing your personal data for the purposes of sending you emails is based on your consent - by consenting to receiving emails you are giving us permission to process your personal data specifically for the purpose of sending you emails.

You may withdraw consent at any time by clicking unsubscribe on any email or by asking to be removed from the mailing list by emailing [info@aiahpc.org](mailto:info@aiahpc.org)

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we will not be able to contact you to keep you updated on our work or perform the contract we have entered into with you. We will however inform you when such actions will occur.

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Our Obligations**

#### **Data sharing**

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.



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We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

**Why might you share my personal information with third parties?**

We may share your personal information with third parties where required by law, where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so.

**Which third-party service providers process my personal information?**

"Third parties" includes third-party service providers (including contractors and designated agents). The following activities are carried out by third-party service providers: Enovation Solutions Limited and Brickfield Education Labs who take care of our Learning Management System and SuiteCRM and MailChimp (whose legal name is The Rocket Science Group LLC) who provide tools that assist us with email distribution to our subscribers.

Except as explained above, we will not share your information with anyone, unless where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so.

**How secure is my information with third-party service providers and other entities in our group?**

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

**What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business and operations of AIIHPC. We may also need to share your personal information with a regulator or to otherwise comply with the law.

**Data security**

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third



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parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Data retention**

#### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different records AIIHPC holds are available in our Data Processing Policy. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In this case, we expect to retain your personal information for 6 years.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

### **Rights of access, correction, erasure, and restriction**

#### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

#### **Your rights in connection with personal information**

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

- **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 correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

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- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the AIIHPC Data Privacy Officer in writing.

The Data Privacy Officer can be contacted via post at AIIHPC, Education & Research Centre, Our Lady's Hospice & Care Services, Harold's Cross, Dublin 6W or electronically by email to [info@aiahpc.org](mailto:info@aiahpc.org).

#### **No fee usually required**

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 we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

#### **Right to 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. To withdraw your consent, please contact the AIIHPC Data Privacy Officer. 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 legitimate basis for doing so in law.



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We have appointed a Data Privacy Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Commissioner at:

Canal House, Station Road, Portarlinton, Co Laois. Phone 1 890 252231 or [www.dataprotection.ie](http://www.dataprotection.ie)

You have the right to make a complaint at any time to the Data Protection Commissioner the Irish supervisory authority for data protection issues.

#### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.