AIIHPC
All Ireland Institute of Hospice and Palliative Care

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AUTHOR: Paula Pinto	**REVISION NO: 2**
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DESCRIPTION

TITLE: **Website Privacy Notice**

AREA: **Data Protection**

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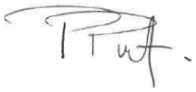
CREATION

AUTHOR: **Paula Pinto**

Programme Manager, AIIHPC



SIGNATURE:

APPROVAL **Karen Charnley**

APPROVED BY: **CEO, AIIHPC**

SIGNATURE:

CONTROL DATES

EFFECTIVE FROM: **November 2025**

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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 to 2018, 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 AIIHPC social media accounts (LinkedIn, X, Facebook, Instagram); 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 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. Please check the review date from time to time, the Effective Date indicates when the notice was last updated.

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).

We will only process your personal information where we are permitted to do so by law, meaning when we have one or more legal basis to do so. The following subsections explain how we process your personal information depending on the context of how personal information typically comes into our care, and include further information about the legal basis or bases that we rely on in those circumstances.

In certain circumstances, we rely on the legal ground known as 'legitimate interests' to process your personal information. This is where the processing of your personal information is necessary to pursue our legitimate interests in a way which is reasonably expected as part of running our business, but which is not detrimental to you and would have minimal impact on your privacy. We undertake an assessment of any potential impact on your privacy before we process your personal information for our legitimate interests.

Insofar as we wish to use your personal information for purposes other than those mentioned above, we will check whether these additional purposes are compatible with the original purposes within the meaning of Article 6(4) of the EU GDPR. Depending on the circumstances, we will inform you about the change of purpose and obtain your consent for the further processing of your personal information.

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

- Identification information, e.g. title, name, organisation you work for, job title or position.
- Contact information, e.g. your address, email address, phone numbers and marketing preferences.
- Personal data contained in documents and correspondence exchanged with you or relating to you, including statements and opinions of yours or statements about you or opinions of you.
- Financial information, e.g. bank and payment card details.
- Technical information, e.g. IP address, details of visits made to our premises such as turnstile/ swipe card access logs, and details of visits made to our online services such as the volume of

traffic, statistics concerning which articles or content you have viewed, online registration details and login credentials.

- Diversity, health, religious beliefs or other special category personal information.
- Images, e.g. CCTV footage taken at our premises and photos taken at our seminars or events.
- For recruitment purposes, we may require Personal information, including name, date of birth, address, contact details, qualifications, languages, education and employment history; Next-of-kin and dependant's information. Pre-employment vetting information including the results of financial and criminal records checks, verification of address and qualifications, references, official forms of ID and right to work status.
- Any other information relating to you which you may provide to us.

How is your personal information collected?

- Directly from you, e.g. when you register for our online or in-person events, seminars, or webinars, or to receive communications from us, or when you subscribe to our online Learning Platform or provide information through electronic platforms made available to you in connection with services that we provide to you. We use third party software to help us manage our email communications. When we send you such communications, we gather information through unique links contained within them which enable us to track who opens particular articles or emails so that we can assess their relevance and improve how we interact with you. In doing so, we do not use any technology (e.g., cookies) to store or access data on your device.
- Via our website, e.g. connection data sent to our webserver by your browser when you connect to our website.
- Via web based services such as our tech-based client solutions and sector-specific blogs, e.g. some analytical information may be collected through electronic platforms made available to you in connection with services that we provide to you.
- Other publicly available sources, such as analytics providers and social media pages such as AIIHPC's X, Instagram, LinkedIn and Facebook accounts.

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

- To complete any request you may make in relation to your marketing preferences, or other preferences relating to our communications with you.
- To provide and improve our services and products, e.g. by monitoring and recording information relating to web based services such as how and when systems are accessed and how data is uploaded, to analyse performance, subject always to our obligations under applicable law.
- To promote our services and to contact you with communications about updates, our newsletters and events.
- For health and safety reasons, (e.g. to inform access, adjustment and dietary requirements for our meetings and events) and the application, audit and enforcement of our policies.

- Subject always to our obligations under applicable law, to improve your experience of our website, newsletters and other services, e.g. by monitoring and recording information relating to your browsing behaviour to make personalised content available to you more efficient and relevant.
- To facilitate our internal business operations, e.g. internal record keeping and accounting.
- Subject always to our obligations under applicable law to monitor and analyse our interactions with you to improve our relationship with you and help us to grow and develop our business.
- For information and physical security and the prevention and detection of criminal and dishonest activity, including to ensure the security of our website and premises, and protect our information systems against data breaches, viruses and similar threats, e.g. by monitoring patterns of activity, and scanning communications for appropriate content, attachments and viruses.
- For our recruitment purposes, including vetting and background checks where appropriate, and to assess suitability, eligibility, and fitness to work.
- For human resources administration, in respect of your application and our onboarding process (if applicable).
- For ensuring fair and non-discriminatory recruitment practices and for diversity reporting/monitoring statistics where we are legally permitted to do so.

Situations in which we will use your personal information

Usually, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To manage our relationship with you, which will include: • Providing updates on AIIHPC's work or AIIHPC member's work • Newsletter • AIIHPC events • AIIHPC member events • Registration to Learning Platform and its use • Notifying you about changes to our terms or privacy policy • Recruitment and selection	• Identification • Contact • Application details • Marketing and communications	• Performance of a contract with you • Recruitment and selection processes • Necessary to comply with legal obligation • Necessary for our legitimate interests (to keep our records updated and to understand how you use our services such as the Learning Platform/Newsletters)
To administer and protect our organisation and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	• Identification • Contact • Technical	• Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security, to prevent fraud) • Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	• Identification • Contact • Usage • Marketing and communications • Technical	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our organisation and to inform our communications strategy)
To use data analytics to improve our website, services, marketing, customer relationship and experiences	• Technical • Usage	Necessary for our legitimate interests (to develop our services and grow our organisation)
To make suggestions and recommendations to you about services, events, webinars, news and publications that may be of interest to you	• Identification • Contact • Technical • Usage	Necessary for our legitimate interests (to develop our services and grow our organisation)

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Legal Bases

Legitimate Interest means the interest of our organisation in conducting and managing our organisation to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interest. We do not use your personal data for activities where our interest re overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contact means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such contract.

Comply with Legal or Regulatory Obligation means processing your personal data where it is necessary for compliance with legal or regulatory obligation that we are subject to.

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 such a Moodle (for the management of The Learning Platform), Mailchimp (for management of our newsletter with you), Eventbrite (for event management), Zoom (for event management), Folk (our Customer Relationship Management database).

We require third parties to respect the security of your data and to treat it in accordance with the law.We may transfer your personal data to the UK. Any such transfer is on the basis of an adequacy decision issued by the European Commission in respect of the UK. The documents detailing this adequacy decision can be accessed via the following links: Implementing decision - 2021/1773 - EN - EUR-Lex (europa.eu) and Implementing decision - 2021/1772 - EN - EUR-Lex (europa.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?

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

External third parties

Service providers acting as processors based in Ireland, the UK, and the US.

Third-party partners for the purposes of hosting events.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

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.

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 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. 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

In certain circumstances, your ability to exercise your rights in relation to your personal information may be subject to exemptions, as set out in law.

- **Right to make a complaint** at any time to the Data Protection Commission ("DPC"), the Irish supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the DPC so please contact us in the first instance.
- **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. 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).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party). 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.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

You may contact the Data Privacy Officer by any means you prefer, but we would prefer you to email us (info@aiihpc.org) or can contact us via post at AIIHPC, Education & Research Centre, Our Lady's Hospice & Care Services, Harold's Cross, Dublin 6W.

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). We will only do this when special category date (such as health data) is requested, and we will ensure only relevant personal data is requested. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

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.