

**Irish Institute of Pharmacy**

*www.iiop.ie*

**Data Protection Policy**

**1. Scope of Policy**

- 1.1 This Data Protection Policy governs the use of personal data that is provided to the Royal College of Surgeons in Ireland by members of the Irish Institute of Pharmacy (“**Members**”). Members may provide RCSI with their information in the course of their participation in Institute activities or while using any of the Member facilities on the iiop.ie website (the “**Site**”).
- 1.2 Non-members of the Institute may also be able to access certain pages the Site and if they provide personal data to the Institute while doing so, this Policy shall also apply to them.
- 1.3 Please read the following carefully to understand our views and practices regarding Members’ personal data and how we will treat it.

**2. The Irish Institute of Pharmacy (“Institute”) and the Royal College of Surgeons in Ireland (“RCSI”)**

- 2.1 Pursuant to Section 7(1)(d) of the Pharmacy Act 2007, the Pharmaceutical Society of Ireland (“**PSI**”) is required to ensure that pharmacists undertake appropriate continuing professional development, including the acquisition of specialisation. For this purpose, the PSI appointed RCSI to establish and operate the Institute as the PSI’s managing body. While the activities of the Institute are branded under the “Irish “Institute of Pharmacy” and “IOP” names, the legal entity which operates the Institute under contract from the PSI is Royal College of Surgeons, 123 St Stephen’s Green, Dublin 2, Ireland (“**RCSI**”).
- 2.2 The Institute has established the Site to assist members in meeting their Continuing Professional Development (“**CPD**”) obligations so as to facilitate the development of pharmacy practice to ensure that it meets the emerging needs of patients and the wider healthcare system. The Institute oversees the management and support mechanisms for CPD and the commissioning of required education and training programmes.
- 2.3 For the purposes of data protection law, RCSI is a “data controller” of the data that Members provide to the Institute.

**3. Members’ Areas of the Site**

- 3.1 The Site is provided predominantly as a resource for eligible Members who can avail of the Member facilities on the Site. These facilities, such as the Institute’s ePortfolio, online learning opportunities and discussion forums, are available to Members once they log in to their Members’ accounts.

**4. Information stored in the Members’ Area**

- 4.1 In the first instance, Members’ accounts are generated by the Institute using contact and registration data provided to the Institute by the PSI. This information comprises

name, contact details (e.g. post and email) and PSI registration number only. Thereafter, it is the Members themselves who determine what information is stored in their Members' accounts and the Members decide what content in their accounts is available publicly and which pages are private. So while Member's accounts will differ from Member to Member, typically the information which is hosted by the Institute could be categorised as follows:

4.2 Personal Data: This is data which identifies or is capable of identifying a living individual and includes the following:

- (a) **Information Members Provide to the Institute:** Members may give the Institute information about themselves in a number of different ways. For example, Members may provide personal data to the Institute when subscribing for Institute services or registering for Institute events.
- (b) **Data Inputted by Members:** Members determine what personal data they choose to upload to their Member accounts. For example, the Site facilitates the uploading of information from other CPD sources. While the Site facilitates the transfer and storage of this information, the Institute has no role or responsibility in relation to its accuracy, honesty or lawfulness.
- (c) **Technical Data about Members:** On the occasion of each Member's visits to the Site, we may automatically collect technical information, including the Internet Protocol (IP) address used to connect a Member's computer to the internet, the domain and host from which a Member accesses the internet, the Member account login information, browser type and version, time zone setting, browser plug-in types and versions, type of device, operating system and platform. We may also employ analytics tools such as Google Analytics and location services to determine a Member's approximate location.

4.3 Non-Personal Data

- (a) The Institute may view aggregate data from unpublished/unshared accounts in the interests of understanding general trends and patterns in CPD and to identify Member needs.

## 5. **Privacy Settings/Data Security**

- 5.1 Any personal data of Members will be retained and used in accordance with applicable Data Protection laws and regulations.
- 5.2 Members control the privacy settings that are applied to their Member accounts. Therefore the Institute accepts no responsibility for any use made of information that Members choose to submit to public webpages or which is otherwise made available in the public domain.
- 5.3 For Member account information that is maintained by a Member in the non-public pages of a Member's account, the Institute is committed to safeguarding the privacy and security of such information. Subject to the disclosures set out in paragraph 7 below, the Institute will take all reasonable measures to ensure the confidentiality of all information and we will take all reasonable and appropriate steps to protect data stored in the Member's account against accidental or unlawful destruction, accidental loss or alteration and unauthorised or unlawful storage, processing, access or disclosure.

- 5.4 Unfortunately, the transmission of information via the internet is not completely secure. Although the Institute will do its best to protect Members' personal data as described in this Policy, the Institute cannot guarantee the security of data transmitted over the Internet.
- 5.5 Members are responsible for retaining the confidentiality of their log-in credentials for their Institute accounts. RCSI/the Institute will not be responsible for any use of a Member's account which arises from the Member's failure to maintain the security of his or her data.

## 6. Use of Information by the Institute

- 6.1 The Institute processes Member data stored on the Site in the following ways:
- (a) to carry out the Institute's obligations to operate and manage a CPD system;
  - (b) to provide Members with information about the services offered by the Institute (any marketing contact will be subject to the Institute having the level of consent required by law);
  - (c) to prevent fraudulent or malevolent use of the Site and to ensure a better user experience;
  - (d) to notify Members about changes to the Site and associated Institute services; and
  - (e) to ensure that the Site is presented in the most effective manner.
- 6.2 The Institute may also need to access Member accounts for technical administration and IT support purposes.

## 7. Disclosure of Member Information

- 7.1 Disclosures by the Member: The availability of Member data to third parties is predominantly determined by the Member himself/herself, depending on the privacy and account settings chosen. Therefore, where a Member chooses a "private" setting, any non-public data within a Member account will not be available for viewing by any third party. If the Member chooses to make data available for "public" viewing or for sharing with selected parties chosen by the Member, then the Member's data will be shared accordingly.
- 7.2 Legal Obligation: Data may also be disclosed if the Member or the RCSI /the Institute become subject to a legal obligation to provide access to the data.
- 7.3 Successor Organisation to the Institute: Member information will also be disclosed to any successor or assign of the Institute who may be appointed to replace the Institute as the operator of CPD services for the PSI in the future (in which case the same principles as are set out in this Policy will continue to apply to the successor/assignee).

## 8. Anonymised Data

- 8.1 Aggregated or de-identified information may be made available to limited third parties such as:
- (a) Our contractors and business partners who help us operate the Site and the services on the Site (e.g. ePortfolio); and

- (b) analytics and search engine providers that assist us in the improvement and optimization of the Site.

## 9. **Third Party Sites**

- 9.1 The Site may contain links to other third-party websites. The Institute accepts no responsibility for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Data Protection Policy.

## 10. **Retention**

- 10.1 The Institute may retain copies of Member data where required to meet any statutory or regulatory requirements in relation to the retention of data. Normally, personal data will be retained for a period of up to six years following the closure of a Member account, or six years from the date of the last transaction on the account, whichever is the later.

## 11. **Where we store Member Data**

- 11.1 The data that Members store in their Member accounts may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA working for the Institute or for one of the Institute’s suppliers.
- 11.2 Where the Institute engages third party suppliers who process personal data on its behalf, it will bind the suppliers to contractual terms which meet the requirements of data protection laws.

## 12. **Accessing and Correcting your Personal Information**

- 12.1 Under the Data Protection Acts 1988 and 2003, Members have a right to seek access to personal data which the Institute holds about them. Members also have the right to request the correction of information about them which is inaccurate, incomplete or out of date. In certain circumstances, Members can request that the Institute deletes personal data.
- 12.2 Members who wish to access, update or delete their data should, in the first instance, do so themselves using the tools which are available in their ePortfolio Accounts. If this does not suffice, any additional requests should be made to us in writing by post to: Senior Operations Coordinator, Irish Institute of Pharmacy, Textile House, 5 Johnson Place, Dublin 2, Ireland. The current fee for processing a Data Access Request is €6.35. The Institute will ordinarily provide a Member with a copy of the relevant personal information from the Institute’s current databases, or with photocopies of records if they are held only on current paper files. Requests will be dealt with within the 40 day period provided by the Data Protection Acts.

## 13. **Cookies**

- 13.1 The Site uses cookies to distinguish Members from each other and other users of the Site.
  - (a) Strictly necessary cookies. These are cookies that are required for the operation of the Site. They include, for example, cookies that enable Members to log into secure areas of their ePortfolios.

- (b) Analytical/performance cookies. These allow the Institute to recognise and count the number of visitors and to see how visitors move around the Site. This helps the Institute to improve the way the Site works, for example, by ensuring that users are finding what they are looking for easily.
- (c) Functionality cookies. These are used to recognise visitors when they return to the Site. This enables the Institute to personalise content, greet Members by name and remember Members' preferences (for example, your choice of language or region).
- (d) Targeting cookies. These cookies record your visit to the Site, the pages you have visited and the links you have followed. We will use this information to make the Site more relevant to Members' interests. We may also share this information with third parties for this purpose.

13.2 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

13.3 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Site.

#### 14. **Changes to this Data Protection Policy**

14.1 The Institute will continue to review its controls and processes to ensure that they are effective in meeting its commitments to Members. The Institute reserves the right to change this Data Protection Policy without notice at any time and from time to time, including as needed to comply with laws and regulations.

#### 15. **Governing law**

15.1 This Data Protection Policy is governed by Irish law and all issues relating to this Data Protection Policy are governed exclusively by Irish law and are subject to the exclusive jurisdiction of the Irish courts.

15.2 This Data Protection Policy is applicable from 18 November 2014.