



## **Data Privacy Policy**

The College collects certain information about Members in the course of operating its business. This notice sets out details of the information that we collect, how we process it, and who we share it with. It also explains your rights under data protection law in relation to our processing of your data.

### **Who controls the use of your personal data?**

The College of Psychiatrists of Ireland controls and is responsible for personal data that is collected in relation to your membership and/or professional competence enrolment. If you have any queries in relation to the processing of your personal data, please contact the College at 5 Herbert Street, Dublin 2.

### **What personal data is collected?**

In order to provide our services to you we need to process certain personal data in relation to you, which includes:

- *Biographical data* – The College collects the following biographical data: name, assumed names, address, phone number, email address, gender, date of birth, PPS Number (the latter only if on payroll).
- *Payment data* – If you pay by direct debit or receive payments through electronic funds transfers, we will collect the IBAN, BIC and the name of your bank/building society. The College does not retain credit card details.
- *Interactions with us* – If you interact with us by email or on paper we will retain details of those interactions in line with our retention period for such correspondence.
  - Training records – retention period 20 years after you complete your training
  - Membership details – retention period 5 years after you resign or allow your membership to be suspended
  - Financial data – 7 years as required by revenue.
  - Personnel data – 7 years after a P45 is issued by the College.
  - PCS records – retention period 6 years – the current year data and previous 5 years as advised by the Medical Council.
  - When we no longer need your personal data, it will be deleted or destroyed in a secure manner.



- *Online services* - When you interact with us online (by computer, tablet or smartphone or similar device), you will often provide personal data to us, which you will be aware of when using the services or for which you give consent. Further details are available in the cookies policy and/or the Data Protections Statement that accompanies the relevant service.

### **Where does CPSYCHI collect personal data from?**

Most of your personal data that we collect will be provided by you through our application forms, registration forms and your interactions with us.

### **Why do you process my personal data?**

We process your personal data in order to provide you with our services and to assist us in the operation of the College. Under data protection law the College is required to ensure that there is an appropriate basis for the processing of your personal data, and is required to let you know what that basis is.

There are various options under data protection law, but the primary bases that we use are :

- (a) processing necessary for the performance of our relationship with you as a member or trainee.
- (b) processing necessary in order for us to pursue our legitimate interests,
- (c) processing that is required under applicable law.

Here are further details of our processing of your personal data below, together with the basis for that processing:

- *Administering your membership* – The College will process your personal data in order to administer your membership. This includes processing your personal data in order to make and receive payments, and to maintain your current record. Where we process your personal data in order to administer your membership this will be on the basis that it is necessary in order for the performance of our relationship with you.
- *Providing you with services* – The College provides different channels to engage with you in order to perform our obligations, including where you have opted to avail of electronic channels such as Moodle and the CPD Diary.



- *Running the College* - As a professional membership organization it is essential to ensure that we can manage your membership.
- *Marketing* – If you consent to the College sending you information messages about the College products and services , for example, conferences, courses and events, we will process your personal data.

The College also undertakes research and surveys which provide us with insights and information. This helps us to advocate for an improved mental health system. If we process your personal data for surveys or research, this will be subject to your consent.

- *Administering our computer systems* – The College technology and computer systems to run our business.

## **Consent**

In order to process certain personal data in relation to you, for purposes such as surveys, newsletters or research, we may need to get your consent. You are free to withdraw that consent at any time. You can withdraw your consent by contacting us using the contact details at the bottom on this notice. Please note that if you withdraw your consent we may not be able to continue providing you with the service to which the consent related.

## **Information you are obliged to provide**

The College requires certain information from you in order to be able to enter into a relationship with you and to provide you with our services. Where this is the case, we will indicate on relevant forms what personal data is required. If you do not provide the information, we will not be able to provide you with our services.

## **Retention of personal data**

The College will retain your personal data in accordance with our record retention policy. This policy operates on the principle that we keep personal data for no longer than is necessary for the purpose for which we collected it. It is also kept in accordance with any legal requirements that are imposed on us. This means that the retention period for your personal data will vary depending on the type of personal



data and the services we provide you with. For further information about the criteria that we apply to determine retention periods please see below:

- *Statutory and regulatory obligations* – As we work in educational / training / professional competence environment, the College has certain statutory and regulatory obligations to retain personal data for set periods of time.
- *Business requirements* – As we only collect personal data for defined purposes, we assess how long we need to keep personal data for in order to meet our reasonable business purposes.

## **College Meetings and Privacy**

- Most College meetings are recorded in the form of minutes or notes of meetings.
- This means that attendance and apologies are recorded and sometimes individuals are referred to in the text of the minutes/notes.
- This is to ensure that the business of the College is conducted in an open manner and recorded correctly. The legal basis for collecting this is legitimate business interest of the College.
- Minutes of meetings are available to the members of that particular faculty / committee / group or Department and are therefore usually widely available. They are not usually publicly published on our website and are kept in the Members Only area of the site. Please keep any copies of minutes of meetings in a secure area and delete when you no longer require them.
- Unofficial recording of a meeting by an attendee at a meeting, such as by audio recording on a mobile phone or personal notes, that may be passed on externally could be liable to GDPR breach if a person is identifiable in those recordings / notes in anyway. Therefore the College asks that committee / faculty members treat meetings as confidential and do not carry out such unofficial recordings of meetings.
- Minutes are stored on our secure IT system and may also be stored in the relevant paper file. The duration for keeping these records is 20 years after which they will be securely destroyed or deleted

## **Your rights**

You have various rights under data protection law, subject to certain exemptions, in connection with our processing of your personal data:

- *Right to access the data* – You have the right to request a copy of the personal data that we hold about you, together with information about our processing of that personal data.
- *Right to rectification* – You have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the



information such that it is complete.

- *Right to erasure* – You have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten. Depending on the services we provide to you, this may have implications for your training records, employment records, professional competence records.
- *Right to restriction of processing or to object to processing* – You have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- *Right to data portability* – You have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, format.

In order to exercise any of the above rights, please contact us using the contact details set out below.

### **Questions and Complaints**

If you have any queries or complaints in connection with our processing of your personal data, you can get in touch with us using the following contact details:

- Post: Chief Executive, The College of Psychiatrists of Ireland, 5 Herbert Street, Dublin 2.
- Email: [info@irishpsychiatry.ie](mailto:info@irishpsychiatry.ie)

You also have the right to lodge a complaint with the Data Protection Commission if you are unhappy with our processing of your personal data. Detail of how to lodge a complaint can be found on the [dataprotection.ie](http://dataprotection.ie) website. [www.dataprotection.ie](http://www.dataprotection.ie)

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