### **PRIVACY NOTICE**

This privacy notice describes how the Irish Institute of Pensions Management (referred to as **IIPM** and collectively as **"we" "us"** or **"our"**) as Data Controller collects and processes Personal Information where we provide and manage educational programmes and Continued Professional Development (CPD) records (our "Services") to members and other individuals who wish to avail of the Services we provide.

The IIPM recognise the importance of our member's and other individual's data and this privacy notice will set out how and why we use your data.

When we process your Personal Information, we act as controllers. Together with our education partner we co-operate with our members and other individuals in meeting our compliance obligations under the law.

# 1. PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT IT

Personal Information is information that identifies you as an individual. We may collect the following Personal Information of our members and other individuals:

Name, date of birth, personal address, employer address, contact telephone number, contact e-mail address, name and address of employer, previous employment history, previous educational attainment, and educational designations held.

We may collect your Personal Information from you directly via forms, telephone, e-mail, our website, our CPD recording website, or from your employer via telephone and e-mail. We do not collect any Sensitive Data as defined under Data Protection legislation.

### 2. HOW IS PERSONAL INFORMATION STORED

All Personal Information is stored securely under password protected data storage systems and on our CPD recording site <u>https://iipmcpd.ie</u>. The IIPM will not transfer or store Personal Information outside of the EEA.

### **3. BASIS FOR PROCESSING PERSONAL INFORMATION**

We have a legitimate interest to process your Personal Information. This legitimate interest will be to manage and provide education and CPD services and records.

### 4. HOW WE MAY USE YOUR PERSONAL INFORMATION

We use your Personal Information:

- to provide Services to our members and other individuals
- to ensure that the Services we provide are appropriate to our members and other individuals requirements
- able to improve our Services to our members and other individuals
- A to maintain accurate transaction and subscription records
- Ito maintain accurate CPD records
- If for marketing activities
- Ito manage the IIPM in a complaint and efficient manner

- to comply with our obligations under Company Law Legislation, e.g annual reporting and audits
- to comply with our obligations to education oversight bodies
- able to comply with other obligations such as Central Bank of Ireland audit requirements

# 5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We will never sell or make public your Personal Information to any third party for the profit or gain of the IIPM and will only use Personal Information for the promotion and provision of our Services.

# **6. SECURITY AND RETENTION**

We will retain your Personal Information for as long as is necessary for the provision of Services to our members and other individuals. When we no longer need your Personal Information in connection with the Services, we will then retain your Personal Information for a period of time that reasonably allows us to comply with obligations to Quality and Qualifications Ireland or alternative agency responsible for promoting quality and accountability in education services from time to time, other educational bodies which may require verification of your examination results and CPD records and the Central Bank of Ireland.

We may retain aggregated or anonymised data (which is not treated as Personal Information under this privacy notice) for longer.

# 7. OUR WEBSITE AND COOKIES

When you visit our website we will use cookies to determine the number of people using our site, whether you have visited our website before, to better understand how you use find and use our web pages and to see your journey through the website.

Although data such as your geographical location, device, internet browser and operating system, is recorded none of this information personally identifies you to us.

Should you choose to contact us using the contact form on our Contact us page or an email link, none of the data that you supply will be stored by this website or passed to / be processed by any third party processors. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol. Our SMTP servers are protected by Transport Layer Security (TLS) also known as SSL meaning that the email content is encrypted using SHA-2, 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices. All traffic (transferral of files) between this website and your browser is encrypted and delivered over HTTPS.

### 8. BREACHES

Where a Personal Information breach occurs, we shall, without undue delay and where feasible within 72 hours of becoming aware of the breach, notify the Data Commissioner's Office.

If the breach is likely to result in a high risk of adversely affecting an individual's rights and freedoms we will also inform those individuals without undue delay. We will also keep a record of any Personal Information breaches.

### 9. ACCESS TO PERSONAL INFORMATION

If you would like to review, correct, update, suppress, object to, or restrict the processing of your Personal Information or request a copy of your Personal Information held by the IIPM, you may do so by contacting:

Irish Institute of Pensions Management Suite 2, Slane House 25 Lower Mount Street Dublin 2

Or by emailing us at info@iipm.ie

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete transactions that began prior to requesting a change or deletion. There may also be residual information that will remain within our records, which will not be removed.

### 9. CHANGES TO OUR PRIVACY NOTICE

You may request a copy of this privacy notice from us using the contact details set out above or by visiting our website www.iipm.ie. We may modify or update this privacy notice from time to time by making available a revised version to our members and other individuals.

Last Updated: Oct 2019