



## Data Protection Statement - ASI E-Learning ([moodle.alzheimer.ie](https://moodle.alzheimer.ie))

**Who are we:** The Alzheimer Society of Ireland (ASI) is a company limited by guarantee and a registered charity in the Republic of Ireland (CHY 7868).

**What do we do:** The ASI works within communities nationwide providing dementia related services such as day care, home care, respite, social clubs, dementia advisors and a national helpline. The ASI also advocates for the rights and needs of all people living with dementia and their carers or families. We process personal data (identifying information) and special category personal data (more sensitive data such as health information) to carry out this work. ASI is committed to adhering to data protection legislation and you can find the ASI privacy statement [here](#) on our main charity website.

**Training with ASI:** The ASI is also engaged in training, both internally with staff/volunteers and externally with members of the public across the country. The charity utilises the e-learning site <https://moodle.alzheimer.ie/> to host various courses and collect and store data on learner activity and outcomes. This statement gives details on how we use your data as you engage with ASI e-learning.

**What personal data we collect from you on this site:** When you enrol on a course at [moodle.alzheimer.ie](https://moodle.alzheimer.ie) we collect the following data: your name, age, address, email, assignments, training records, video and/or still image. Through online discussions or course work we may also gather special category personal data (potentially more sensitive data) such as health data, race and ethnicity, religious or philosophical beliefs.

**Our legal grounds for processing:** In each instance that ASI processes your personal data and/or special category personal data for the purpose of training/e-learning it is reliant on one of the following legal grounds set out in Articles 6 & 9 GDPR.

- Legal Basis Legitimate interests (*It is in the interests of ASI to efficiently and effectively provide suitable e-learning training courses for staff, volunteers, carers and other family members of persons with dementia.*)
- Necessary for execution of a contract
- Consent (can be withdrawn at any time)
- Explicit consent (can be withdrawn at any time)
- Association / Not-for-profit organisation
- Data made public by the individual
- Vital interests
- Compliance with a legal obligation

**How we use your data on this site:** The data we collect from you on this site is collected and retained in order to facilitate setting up your e-learning Moodle Workplace account, tracking your course progress, provide learning resources and retaining your results/certificates awarded. In order to provide a complete and up to date record of your learning you have access to all courses taken and certificates under your User Profile. A user name and password is required in order to set up your account. This allows you to create and secure your account login details. Your data is not used to contact you between taking courses unless you specifically opt in to receive further information from ASI in relation to new courses or ASI activities. ASI training does not engage in profiling or automated decision making.

**Ensuring your privacy is maintained on this site:** Access to your account is based on the user name and security password which are retained by you and the password can be changed by you at any time. It is

important that you protect this information. If your password has been compromised for any reason you should change it immediately. Please contact [learninganddevelopment@alzheimer.ie](mailto:learninganddevelopment@alzheimer.ie) if you require any assistance with this.

**Who we share your data with:** Third party vendors assist ASI in the delivery of e-learning training by providing a secure online environment. This means your data is also processed by Enovation Ltd., the company contracted by ASI to host the Moodle Workplace platform. A data processing and commercial agreements are in place between ASI and Enovation. Your data is processed as directed by ASI in line with our commitment to you regarding your privacy. If you use the video conferencing plug-in supplied on the site your data will also be processed by Big Blue Button. A data processing agreement is also in place with Big Blue Button and their privacy policy is available here: <https://docs.bigbluebutton.org/admin/privacy.html>

Separately, as a charity representing vulnerable individuals ASI has a duty of care to persons with dementia and carers. If the safety or health of a learner, or a person with dementia, is compromised or in danger, we may be required to report this to the ASI Safeguarding Officer for possible further steps with the authorities.

**How long we retain your data:** For non-ASI staff, ASI will retain e-learning data for a period of five years since its last use by you. This allows learners to re-enter their learning portal and re-engage with the material as a useful resource for several years after the conclusion of their course. In this way ASI continues to retain your data if you continue to re-engage with your Moodle Workplace account. Conversely, if you would like this data to be deleted prior to the expiry of this normal five year retention timeline you can email [learninganddevelopment@alzheimer.ie](mailto:learninganddevelopment@alzheimer.ie). In exceptional circumstances, records may be retained for longer where they are required for actual or potential legal actions or the management or mitigation of operational or strategic risks to the organisation. For ASI staff, ASI will retain e-learning data until the course expires and learning certificates and/or records for a period of eight years following the end of your employment with ASI.

**Where we keep your data:** Enovation Ltd., our hosting third party provider, stores ASI data in digital form in a secure data centre in Ireland. Using Big Blue Button web conferencing necessitates the transfer of personal data to Canada by relying on the country's adequacy status with the EU.

**Your rights relating to your data:** Individuals have rights over their personal data under EU and Irish Data Protection law. These rights are not absolute and qualifications or restrictions can apply. In summary your rights are: Right to be informed; Right of access; Right to rectification; Right to be forgotten / erasure; Right to restrict processing; Right to object; Right not to be subject to automated decision making and/or profiling; Right to portability. If you believe your data privacy rights have been infringed you have the right to make a complaint to the Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, email: [info@dataprotection.ie](mailto:info@dataprotection.ie). You can also seek compensation through the courts.

**Contact the ASI Data Protection Officer:** ASI is committed to helping individuals exercise their data protection rights. **Address:** DPO, ASI National Office, Temple Road, Blackrock, Co. Dublin. **Email:** [dataprotection@alzheimer.ie](mailto:dataprotection@alzheimer.ie)

*We will update this data protection statement from time to time. Any updates will be made available and, where appropriate, notified to you.*