

ASI Privacy Statement E-Learning (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 (Registered charity number 20018238).

What do we do? ASI works within communities across the country providing dementia related services such as day care, day care at home, home care, social clubs, Alzheimer cafés, dementia advisors, community engagement and a national helpline. The ASI also advocates for the rights and needs of all people living with dementia and their carers or families. ASI processes 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 Main Privacy Statement in the footer of our charity's website.

How does ASI Training (e-Learning) process data? The ASI is also engaged in online 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. ASI collects and stores data on learner activities and outcomes. This statement gives details on how we use your data as you engage with ASI e-learning.

What personal data do we collect? If you are an external participant and choose to enrol on a course at moodle.alzheimer.ie then ASI will collect the following personal data: your name, age, address, phone, email, assignments, training records, video and/or still image. Through online discussions or course work you may potentially provide special category personal data (potentially more sensitive data) such as health data, race and ethnicity, religious or philosophical beliefs. Internal participants (ASI staff / volunteers) must routinely complete mandatory training by e-learning which processes minimum personal data: name, ASI email address and course result.

How do we use data for ASI E-learning? The data we collect from you on the Moodle site is processed and retained in order to facilitate setting up your e-learning Moodle 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 username 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 Training in relation to new courses or ASI Training activities. ASI Training does not engage in profiling or automated decision making.

What are our grounds for processing? In each instance that ASI processes your personal data and/or special category personal data it is reliant on one of the following legal grounds depending upon how or why you are interacting with us. Under GDPR there are six distinct legal basis for the processing of personal data (Art. 6) and a further ten distinct legal basis for the processing of special category personal data e.g. more sensitive information such as health (Art. 9). ASI decides which legal basis is most suitable to align with each act of processing as set out below.

Purpose

ASI Training E-learning

Legal basis

Legitimate interests (Art.6)

- *It is in the interests of ASI to efficiently and effectively provide suitable training courses for our staff and for carers and family members of people with dementia.*

Necessary for execution of a contract (Art.6)

Consent (can be withdrawn at any time) (Art.6)

Data made public by the individual (Art. 9)

Explicit consent (can be withdrawn at any time) (Art.9)

Association / Not-for-profit organisation (Art.9)

Vital interests (Art. 9)

How long do we retain your data? Data for external learners who may be carers, family members or members of the public, is retained for 5 years from completion of a final e-training module. This is deemed to be a reasonable length of time as individuals may wish to reengage with ASI e-learning after a lapse in time. It allows participants re-enter the Moodle portal to re-engage with the material as a useful resource for several years after the conclusion of their course. In this way ASI continues to process your data if you continue to re-engage with your Moodle account. If you would like your e-learning data to be deleted prior to the expiry of this normal five-year retention period, you can email learninganddevelopment@alzheimer.ie. For ASI staff, ASI Training will retain e-learning data until the course expires and retain learning certificates and/or records for a period of eight years following the end of your employment with ASI. The e-learning data of ASI volunteers will be stored for the length of time they are involved with ASI. 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.

Where do we keep your data? Sector leader service providers have been contracted and ASI data, in digital form, is stored in data centres in Ireland. All back up servers are located inside the EU. ASI IT oversee key security and usage procedures and policies relating to information security and devise clear instructions for staff. Ennovation Ltd., is the hosting third party provider for ASI Training and stores ASI e-learning data in a secure data centre in Ireland. ASI Training also contracts Big Blue Button web conferencing. If you use the video conferencing plug-in supplied on Moodle your data will also be processed by Big Blue Button. This necessitates the transfer of video conferencing data to Canada by relying on the country's adequacy status with the EU to ensure the legality of the cross-border data transfer.

How does your process ensure privacy? Access to your Moodle account is based on the username and security password which are retained by you and the password can be changed by you at any time. It is important you protect this information. If you believe your password has been compromised, change it immediately. Please contact learninganddevelopment@alzheimer.ie if you require assistance.

Do we share your data? ASI contracts third party service providers to manage and store personal data. These situations, outlined above, are managed by data processor agreements which contain clear contractual safeguards for individuals. It is important to note as a charity representing vulnerable individuals the ASI has a duty of care to persons with dementia and carers. If the safety or health of learner, or a person with dementia, is believed to be compromised or in danger, ASI Training may, in certain circumstances, report this to the ASI Safeguarding Officer or otherwise share your personal data to ensure your safety.

What are your rights? 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. The most exercised right by individuals is the right of access. This is the making of a request by a data subject, which gives them the right to obtain – subject to certain restrictions provided for under the GDPR and the DPA 2018 – access to, and copies of, their own personal data, and other relevant information, free of charge and in an accessible form. A data controller must ensure that individuals whose data they are processing are facilitated in lodging access requests. A data controller must provide a response to an access request in a certain manner and within a certain time.

In summary, the rights that can be exercised by data subjects under data protection law also include: the right to be informed; 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 and the right to withdraw consent at any time. ASI is committed to helping individuals exercise their rights over their own data. Please contact the ASI DPO as set out below to exercise any of these rights or for further information. If you believe your data privacy rights have been infringed by ASI, you have the right to make a complaint to the Data Protection Commission using the contact details below. It may also be possible to seek compensation through the courts.

How can you contact the ASI Data Protection Officer? You can contact the ASI DPO by email: dataprotection@alzheimer.ie or by post: DPO, Alzheimer Society of Ireland, National Office, Temple Road, Blackrock, Co. Dublin, A94 N8Y0. Telephone: (01) 2073800

You can contact the Irish data protection regulator, the Data Protection Commission by webform on its website www.dataprotection.ie by email: info@dataprotection.ie or by post: 21 Fitzwilliam Square South, Dublin 2, D02 RD28 and Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23. Telephone (01) 765 01 00 / 1800 437 737

ASI updates this main Privacy Statement periodically. Updates will be made available and, where appropriate, notified to you. Privacy Notice dated: October 2024