**Northern Ireland Hospice**

**Privacy Notice (Education)**

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| **Introduction** |

Northern Ireland Hospice (NIH) is committed to protecting the privacy of everyone who uses our care services (as patients or carers), our employees and volunteers, our education customers, our retail and café customers, our Members and Trustees, our service providers and anyone who supports our work through our fundraising activities. This policy explains what personal data we collect and process, how we collect it, how long we keep it, why we collect and process personal data, whom we share it with, and on what legal basis. It also explains the steps we take to keep data secure and ensures that you remain informed with regard to your rights and in control of your information. We will only use personal data that we collect in line with all applicable laws, including the General Data Protection Regulation (GDPR)

Sections:

1. Care Services (Patients, Carers and Family)
2. Donors and Supporters
3. Employment (recruitment candidates and employees) and Volunteers
4. **Education**
5. Retail and Café
6. Members and Trustees
7. Service Providers
8. **General Information**

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| **4.0 Education Department** |

We collect and process personal data for maintaining our education records and processing payments, and to deliver education via online platforms. We also collect and process personal data on the basis of necessity for the performance of our contract with you for the purposes of processing payments.

The legal bases on which we process this personal data are: legitimate interest (the legitimate interests of Northern Ireland Hospice are to provide palliative care to patients, and support and information to their carers and families - for example social work, bereavement support, chaplain support - and to manage the effective running of Northern Ireland Hospice ); the performance of our contract with you to provide you with education services in return for our fee and, in the case of marketing of our services/fundraising, your consent.

We obtain consent for contacting education services customers via electronic communications (email and text message) and process on the basis of our legitimate interests for contacting customers via phone for administrative purposes and postal mail of our prospectus and other marketing of education events.

We provide an opt out option to you in respect of postal marketing – this is included in all such contacts with you. Otherwise if you wish to opt out at any time please contact [education@nihospice.org](mailto:education@nihospice.org)

**4.1. What data do we collect about you?**

Personal data we collect may include one or more of the following:

* your name
* contact address
* telephone number(s)
* e-mail address
* records of your correspondence with us
* card payment details to process a course payment

When you use our website, we use tools like Google Analytics to collect information such as your IP address, the browser you use, (eg Internet Explorer, Firefox etc) domain names, the time of day you accessed the website and referring Website addresses. This information helps improve our online services, ensures security and helps protect against fraud. It also assists with diagnosing online problems with our website.

We also use cookies to give us more understanding of how people use our website – see our Cookies Statement ***https://www.nihospice.org/cookies***

**4.2 How do we use the data we collect about you?**

We use your personal data for a number of purposes including the following:

* to deliver services, literature and/or other materials and information you have requested from us
* unless you tell us otherwise, we will send you information that we think you may be interested in, including

updates on our work, news, events and research . We may send this information by e-mail, where you have

provided consent. If you do not want to receive this information you have the option to opt out. Just let us

know when you provide your data or contact us on 028 90781 836 or e-mail us at education@nihospice.org

* for our own internal administrative purposes
* to manage your communication preferences i.e. how you have chosen to be contacted
* carry out research and surveys about our services
* to comply with applicable laws and regulations.

We may also collect and retain your information if you send feedback about our services or make a complaint.

**4.2.1 Sharing your data with others**

NIH will only share your data with third parties except where required to provide the service you have requested (for example we will share your personal data with authorised external trainers so that they can deliver the relevant training to you) and in that case were we have in place suitable safeguards with the data recipient to protect your personal data .

Other circumstances when we might need to share your data can be found in Section 8.4 at the end of this Privacy Notice

Rest assured, we never share, sell, swap or rent your data to third parties for marketing purposes.

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| **8.0 General Information** |

**8.1 How do you update your Personal Data?**

We want to make sure that your personal data is accurate and up to date. Please let us know if your details change. We may use publicly available sources to keep your records up to date for example, checking your postcode is correct using the Royal Mail postcode lookup facility.

To let us know of any changes please contact:

Education, Innovation and Research Team

Northern Ireland Hospice

74 Somerton Road

Belfast

BT15 3LH

Tel: 028 90781 836

**8.2 What Rights do I have over My Personal Data?**

Under the General Data Protection Regulation, you have the right to:

* be informed – this privacy notice provides the information we are required to provide
* access your personal data
* have your data rectified or erased
* object to or restrict the processing of your data
* withdraw consent if that is the basis of our processing please contact our Education, Innovation and Research team via the contact details provided above with any such requests or our Data Protection Officer (contact details below) with any queries on this issue
* data portability – in limited circumstances you may be entitled to have any personal data we hold and which

you provided to us sent electronically to you or direct to another organization at your request

* not to be subjected to automated decision making (including profiling) which produces legal effects or similar

significant effects – NI Hospice does not currently do this

* to lodge a complaint with NIH or the overarching regulator, the Information Commissioners Office.

Information Commissioners Office – Northern Ireland

3rd Floor, 14 Cromac Place,

Belfast,

BT7 2JB,

Telephone: 028 90 278 757

E-mail: ni@ico.org.uk

You have a right to receive a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

You have a right to ask us to stop processing or to delete your personal data. Where there is no need to for legal or regulatory requirements to retain the data, we will be able to do this.

**8.3 How we protect and keep your data?**

If you tell us not to contact you we will update our records accordingly.

We have security procedures, rules and technical measures to protect your data. Your data will be kept in a secure environment with access restricted on a need to know basis.

Personal data will not be transferred to any third party in a country or territory outside the European Economic Area unless there is a specific operational reason to do so and in which circumstance we will require the third party to comply with and safeguard the data pursuant to requirements of GDPR. We will only transfer your personal data to a Country or Territory outside the European Economic Area whose data protection laws have been assessed as adequate by the European Commission, or where appropriate safeguards are in place.

When using websites owned by other organisations to communicate with us, such as Twitter or Facebook, then please consult their privacy policies/notices.

**8.4 Sharing of your Data by Northern Ireland Hospice**

We will not routinely disclose any information about you without your express permission. However, in addition to some specific reasons for sharing of data outlined within the various sections, there are circumstances where we must or can share information about you owing to a legal/statutory obligation.

Any disclosures of personal data are always made on a case-by-case basis, using the minimum personal data necessary for the specific purpose and circumstances and with the appropriate security controls in place. Information is only shared with those agencies and bodies who have a "need to know" or where you have consented to the disclosure of your personal data to such persons.

The additional circumstances when we might have to share your data with other third parties are:

* You ask us to do so;
* If we are under a duty to do so under a legal obligation;
* Our duty to comply with any Court Orders which may be imposed
* To enforce our terms and conditions or other agreements;
* To protect our rights, property, our safety or the safety of our patients, customers or others;
* If the public interest is thought to be of greater importance, for example, if a serious crime has been

committed.

We may use the information we hold about you to detect and prevent crime or fraud. We may also share this information with other bodies that inspect and manage public funds.

We will only ever share your data in other circumstances if we have your explicit and informed consent.

Rest assured, we never share, sell, swap or rent your data to third parties for marketing purposes.

We may also collect and retain your information if you send feedback about our services or make a complaint

**8.5 How we keep data safe and who has access**

We ensure that there are appropriate technical controls in place to protect your personal details. For example our online forms are always encrypted and our network is protected with controls regularly monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by properly trained staff, volunteers and contractors. We undertake regular data cleansing to ensure that the data is accurate and consistent with NIH Record Keeping Policy.

**8.6 Third Party Processing**

Sometimes we use external companies to collect or process personal data on our behalf. We do comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect or have access to.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as UK or EU companies, we will take steps to make sure they provide an adequate level of protection in accordance with GDPR. Your personal data will not be transferred to countries outside the EEA unless the country‘s data protection laws have been assessed as adequate by the EEA or where adequate safeguards as are approved by the EEA and/or ICO are in place. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

**8.7 Sharing Your Story**

You may choose to tell us about your experiences with life threatening, life-limiting illness as a service user, carer, volunteer, staff member, donor or an Ambassador to help further our work. If we have the explicit and informed consent of the individuals, or their parent or guardian if they are under 18, this information may be made public by us at events, in materials promoting our campaigning and fundraising work, or in documents such as our annual report.

**8.8 Retention Period**

We do not keep your data for longer than is necessary for the purposes for which it was provided. We will retain information on individuals in compliance with statutory requirements or in line with organisational needs where there are no such statutory requirements. This is in accordance with our Records Keeping policy and adheres to the requirements of the GDPR. This policy sets out our retention periods for specific types of personal data and/or the criteria we will use to determine that period.

Current retention timeframes are set out below:

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| **Category** | **Retention Timeframe** |
| General correspondence files | 5 years |
| Accounting Records | 6 years |
| Gift Aid Declarations | 6 years |
| Contracts | 6 years |
| Commercial Room hire files | 7 years |
| Complaints | 10 years |

**8.9 Changes to this Privacy Notice**

We might change this Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the NIH website or by contacting you directly. The date when this privacy notice was last updated will be stated at the end of the Policy

If you have any questions about this privacy notice or about our data processing in general, require more information, of if you want to see what information we hold about you, please contact our Data Protection Officer

using the following contact details:

Beverley Kernoghan

Data Protection Officer

Northern Ireland Hospice

18 O’Neill Road

Newtownabbey

Co Antrim

BT36 6WB

Tel: 028 90781 836

Email: [beverley.kernoghan@nihospice.org](mailto:beverley.kernoghan@nihospice.org) Updated: June 2018