

MEMBERS DATA PROTECTION NOTICE AND POLICY – OCTOBER 2021

The Irish Professional Mediator's Organisation Limited (IPMO) CLG takes privacy and the protection of our Members and IPMO friends, and designate data very seriously. In this notice, we explain how we collect your personal information, how we use it and how you can interact with us about it.

Who are we? When we talk about "IPMO", or "us" or "we" in this notice, we are talking about IPMO.

1 How we collect information about you

We collect personal information from you, for example when you become a member or become an IPMO friend or apply for accreditation for a training programme or seek exemption from mandatory training requirements. We also collect information through our websites and social media. Our websites use 'cookie' technology. A cookie is a little piece of text that our server places on your device when you visit our website. They help us make the site work better for you. When you apply to us for exemptions from any mandatory training programmes, we may verify by sending and receiving information about you, to and from third parties, whose details you provide to us

2 How we keep your information safe

We use technical and organisational measures to protect your personal information from unauthorised access, to maintain data accuracy and to help ensure the appropriate use of your personal information. These security measures include encryption of your personal information, firewalls, intrusion detection systems, 24/7 physical protection of facilities where your personal information is stored. We use strong encryption algorithms for the transmission and storage of your information. When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information.

3 How long we keep your information for

How long we hold your information depends on the nature of the information and the purposes for which it is processed. We determine appropriate retention periods which meet our legal and regulatory obligations. We hold your information while you are a member, IPMO friend or accredited training provider and for a period of time after that. We do not hold it for longer than necessary. If the purpose for which the information was obtained has ceased and the personal information is no longer required, the personal data will be deleted or anonymised (i.e. all identifying characteristics are removed).

4 Meeting our legal and regulatory obligations

To meet our regulatory and legal obligations, we collect some of your personal information, verify it, keep it up-to-date through regular checks, and delete it once we no longer have to keep it. We may also gather information about you from third parties to help us meet our obligations. If you do not provide the information we need, or help us keep it up-to-date, we may not be able to provide you with our services as a membership organisation.

5 To use your information lawfully, we rely on one or more of the following legal bases:

Your consent; necessary for the performance of a contract with you; necessary for compliance with a legal obligation; necessary to protect the vital interests of you or others; necessary for the performance of a task carried out in the public interest; or necessary for the purposes of our legitimate interests, including to pursue our goals and promote our services, or the legitimate interests of a third party. We will not process your personal data for these purposes if to do so would constitute an unwarranted interference with your own interests, rights and freedoms.

6 Consent

Sometimes we need your explicit consent to use your personal information. When we use sensitive personal information about you, we may ask for your consent. Before you give your consent, we tell you what information we collect and what we use it for. You can withdraw your consent at any time by contacting us.

7 How we use your information

We use information about you to: process and administer your membership in accordance with our Membership Rules; to organise events, conferences and webinars; to track your professional development in respect of your supervision, mentorship and annual CPD; give you access to on-going learning and networking opportunities including Peer to Peer support; to manage your fees; provide other operational supports; provide and promote information on our membership, education, designation and continuing professional development services; safeguard and promote the welfare of members; carry out surveys and statistical analysis; respond to your enquiries or complaints; confirming details relating to you to other professional education partners or professional standards bodies (e.g. the Mediation Council of Ireland), where there is a legitimate interest in sending those details; prevent unauthorised access to your information; meet our legal and regulatory obligations; establishing, exercising or defending legal claims; implementing our Complaints procedure.

To provide our services as a membership organisation under the terms and conditions we agree between us, we need to collect and use personal information about you. If you do not provide this personal information, we may not be able to provide you with our services.

8 Your information and third parties

Sometimes we share your information with trusted third parties. For example, we share information with: service providers (e.g. printers, auditors, legal advisors and other professional advisors); or professional standards bodies (e.g. the Mediation Council of Ireland); Information and Communications Technology (ICT) and information security providers. We may also share information with third parties to meet any applicable law, regulation or lawful request, including with law enforcement agencies, which may be either in or outside Ireland or to deal with any claim or dispute that may arise. We expect these third parties to have the same levels of information protection that we have..

9 Your personal information rights

When your personal information is handled by IPMO in relation to a product or service, you are entitled to rely on a number of rights. These rights allow you to exercise control over the way in which your personal information is processed, subject to applicable exemptions.

For example, we may help you in:

Accessing your personal information: You can ask us for a copy of the personal information we hold about you.

Correcting and up-dating your personal information: If you believe that any personal information we hold about you is inaccurate or out of date, you can look for the information to be corrected at any time.

Withdrawing consent: You can change your mind wherever you give us your consent, such as for direct marketing, or using your sensitive information.

Restricting our use of your personal information: You have the right to restrict our use of your personal information in certain circumstances, such as where our use of it is not compliant with applicable law.

Objecting to our use of your personal information: You have the right to object to us using your personal information, where we are doing so based on this being necessary for the performance of a task carried out in the public interest or for the purposes of a legitimate interest. Where you exercise this right to object, we will be obliged to stop using your personal information in that way, unless there are compelling legitimate grounds for us to continue to do so, despite your objection.

Not to be subject to automated decision making: You have a right (subject to limited exceptions) not to be subject to a decision based solely on automated processing of information, including profiling, which produced significant legal effects concerning you or otherwise significantly affects you.

Deleting your information (your right to be forgotten): You may ask us to delete your personal information.

Moving your information in electronic form (your right to Portability): You may request (in certain cases) that your personal information is transferred to you or another organisation in digital form.

10 How to exercise your rights

You may exercise any of these rights free of charge. You may do so by contacting us:

Phone: + 051 348337 Email: info@theipmo.ie

When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information. Once we are satisfied that we have effectively verified your identity, we will respond to the majority of requests without undue delay and within a one month period (i.e. 30 calendar days) of receipt of the request. IPMO will action your request to have your personal information corrected within 10 calendar days. These periods may be extended in exceptional circumstances and we will inform you where the extended period applies to you along with an explanation of the reasons for the extension.

11 Making a complaint

If you have a complaint about the use of your personal information, please let a member of the board/staff know, giving them the opportunity to correct things as quickly as possible. If you wish to make a complaint you may do so in writing and by email info@theipmo.ie. Please be assured that all complaints received will be fully investigated. We ask that you supply as much information as possible to help us resolve your complaint quickly.

You may also contact the Data Protection Commission in Ireland to lodge a complaint (details below).

Data Protection Commission 21 Fitzwilliam South, Dublin 2, D02 RD28 Web: dataprotection.ie

12 Data Protection Policy

IPMO, as a provider of Membership Services to the mediation services sector in Ireland and beyond, processes personal data for a variety of purposes relating to its members, employees, service providers and other third-parties involved with the organisation. IPMO is therefore a data controller, and in some cases a data processor, and is subject to data protection legislation and regulation. IPMO's Data Protection policy sets out data protection requirements which must be complied with by anyone who processes personal data for or on behalf of IPMO.

13 Updates to this notice and policy

We keep this notice and policy under regular review and will make changes from time-to-time, particularly when we change how we use your information, and change our technology and products or services. We will inform you of material changes to the contents of this Data Protection Notice, through a notification posted on our website or through other communication channels.