

## PRIVACY POLICY - PUBLIC

### 1. Purpose

This privacy policy sets out how MMI Clinical Research Development Ireland (CRDI) uses and protects information – including your personal information, which CRDI collects and receives when you use any of its websites, systems or services. CRDI is committed to compliance with all applicable Data Protection Legislation, including GDPR, the Data Protection Act 2018 and the 2011 e-privacy regulations.

CRDI may change this policy from time to time by updating this document. Please review this notice each time you use our website or our services. This notice was last updated on the date appearing above.

### 2. Scope

This privacy policy is applicable to websites, systems and services provided as part of CRDI. This includes the various programmes which operate under the CRDI umbrella. This may be programmes which are led by CRDI or which CRDI are participating in. For example, CRDI programmes and associated websites include:

- Wellcome – Health Research Board Irish Clinical Academic Training (ICAT) Programme
- HRB- Clinical Research Coordination Ireland (HRB-CRCI)
- CRDI/CÚRAM Partnership
- Irish Prostrate Cancer Outcomes Research (IPCOR)

### 3. Abbreviations

MMI	Molecular Medicine Ireland
CRDI	Clinical Research Development Ireland
GDPR	General Data Protection Regulation
CURAM	Centre for Research in Medical Devices
HRB CRCI	Health Research Board, Clinical Research Coordination Ireland

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DPO	Data Protection Officer
IP	Internet Protocol
EEA	European Economic Area
SSL	Secure Sockets Layer

## 4. Policy Statements

### 4.1 Who we are

Clinical Research Development Ireland (CRDI) is a not-for-profit research partnership comprising NUI Galway, Royal College of Surgeons in Ireland, Trinity College Dublin, University College Cork, University College Dublin and the University of Limerick, their medical schools, associated academic hospitals and clinical research facilities, with the objective of accelerating the translation of biomedical research into improved diagnostics, therapies and devices for patients.

CRDI is a company limited by guarantee and may act as data controller for the various programmes which operate under CRDI.

### 4.2 How we use your information

CRDI is committed to ensuring that your privacy is protected. Any information you provide CRDI will only be used in accordance with this privacy policy.

### 4.3 What Information we collect

- We may ask you to provide your contact details, job title and organisation for various CRDI events, training activities, mailing lists and applications.
- We collect more detailed information such as your research area, affiliation with the clinical research facilities/centres and networks when you request to become a member of HRB CRCI and/or other CRDI programmes.
- If you apply for a job vacancy through our website, we may ask you to provide certain information such as your CV and qualifications.
- When visiting our website, we will collect information -on your IP address, operating system and browser type where this is available. This information is logged automatically by the web server and can help us improve the service we deliver. In addition, the IP address is used to improve the security of your interaction with the CRDI websites.

The information we collect may vary depending on the nature of your interaction with CRDI. However, the way we protect your information is always within the terms of this privacy policy.

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#### 4.4 Why we collect the information

Certain information is required by us when you apply to CRDI to partake in one of our programmes or apply for a job vacancy.

#### 4.5 Lawfulness of Processing

There are six lawful bases for processing personal data; consent, contract, legal obligation, vital interests, public task, legitimate interests. CRDI will decide which lawful basis applies depending on the specific purposes and the context for processing. Predominantly the lawful basis will be your consent.

#### 4.6 How long will we keep your data?

We will keep your data for varying amounts of time depending on the nature of the interaction with CRDI:

- We only store data that is necessary for a specific purpose.
- We will not store your data for longer than is necessary for the purpose for which it was collected, unless we are legally obliged to do so by contract or other legal requirement .
- Your data will be securely deleted when no longer needed for the purpose(s) for which it was collected and/or CRDI is no longer obliged to keep it.

#### 4.7 What we do with the information we gather

- The information we gather is used for internal administration of CRDI websites, systems and services, in order to effectively manage those systems and services and to provide appropriate privacy to users.
- Administration and management of CRDI including collecting, collating and analysing information for the effective and efficient management of CRDI.
- Targeted communications with selected groups of individuals for authorised CRDI business purposes such as the organisation of events and research management processes.
- Marketing communications to highlight the activities of CRDI and opportunities for engagement. We will seek your explicit consent to contact you for marketing purposes.
- For effective hiring and candidate management.

Any specific terms and conditions relating to specific websites, services and systems will be communicated to you in the specific context, for example, through a user agreement, but will remain consistent with this policy. For example, see the Website Terms and Conditions document on the HRB CRDI website <https://www.hrb-crci.ie/websitetc/>

#### 4.8 Third Parties

CRDI may communicate your information to third parties who are authorised and contracted to provide CRDI services. We will not disclose your personal information to third parties outside CRDI,

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except for the purposes described in this privacy policy, unless we have your consent, or are required by law to do so. Any such third parties must handle your information in compliance with the privacy policy.

The security and integrity of CRDI systems are of paramount importance to CRDI. Where systems have the potential to transfer data outside the European Economic Area (EEA), CRDI ensures that any such transfers are covered by relevant supplementary controls in line with advice from the Data Commissioner's Office.

#### **4.9 Cookies and Log Files**

We use cookies on the CRDI websites to monitor use of our websites, use of web pages and to tailor the website operation to your needs and preferences. More information is available on the specific use of cookies in the CRDI Cookies Policy on the CRDI website.

#### **4.10 Security and Confidentiality**

We are committed to ensuring that your information is secure. We use leading technologies to safeguard your data, and maintain strict security standards to prevent any unauthorised access. We make every effort to reduce the risks associated with data in transit over the internet by using appropriate technology, including (but not limited to) SSL (Secure Sockets Layer) for any of our websites or applications which collect information from you. However, we cannot guarantee the security of your data in the parts of its journey which are not under our direct control.

#### **4.11 Links to other websites**

Our services may contain links to other websites of interest outside CRDI. This privacy policy only applies to the CRDI websites, systems and services and doesn't cover other websites and services that we may link to. You should exercise caution and look at the privacy statement applicable to the website/service in question.

#### **4.12 Protecting your personal information**

- CRDI is committed to protecting privacy and we are legally required to process all personal information in accordance with the GDPR.
- Special categories of Personal Data and Sensitive personal data means information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. We ask that you do not disclose sensitive personal information (e.g. gender, height, weight, medical information, religion, philosophical or political beliefs, financial data) with us.
- You have the right to request erasure, correction or restriction of processing of your personal data held by CRDI. If you would like to request either of these, please contact us through the details provided below.

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- You have the right to object to processing for direct marketing.
- You have a right to data portability.
- Your rights are not absolute. If we are not able to meet your request, we will explain the reason. You have the right to lodge a complaint with the Data Commissioner’s Office, if you think there is a problem with the way we are handling your personal identifiable information.
- If you would like to request a copy of your personal data or if you have any questions about CRDI’s privacy policy please write to: [dpo@crdi.ie](mailto:dpo@crdi.ie)

#### 4.13 Relevant Contact Details

The Data Protection Officer (DPO) for CRDI can be contacted at [dpo@crdi.ie](mailto:dpo@crdi.ie), or by post at Data Protection Officer, Clinical Research Development Ireland, 28 Upper Mount Street, Dublin 2.

## 5. Revision history

Version	Description of Changes
V1.0	Initial Version

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