



## **Malaysia-Ireland Training Programme for Family Medicine (MInTFM) Privacy Policy**

Your privacy is very important to us, which is why we make sure you are always in control of what we do with your personal information.

We fully respect your right to privacy and to protection of your personal data. Any personal information which you provide to us will be treated strictly in accordance with the Irish Data Protection Acts 1988 to 2018, GDPR and the Personal Data Protection Act 2010 (Act 709) of Malaysia "PDPA" ('Legislation'). We ask that you read this Privacy Policy ('Policy) carefully as it contains important information as to how we use your personal data.

### **How to contact us**

If you have any questions about this Policy or information we have collected about you, please contact [dataprotection@icgp.ie](mailto:dataprotection@icgp.ie) or Data Protection Officer, ICGP, 4-5 Lincoln Place, Dublin 2. D02 XR68

### **The Information We Collect About You**

We collect information to provide you with a better experience of using our websites and applications and to facilitate our audiences, and visitors to the ICGP and MintFM websites (see the "How will MintFM/ICGP use my information?" section below).

In order to provide you with access to certain services or data within our websites and applications, or to our services and MintFM/ICGP facilities we may require that you provide certain personal information. This information may include:

- Your name, postal address, telephone number, email address and/or method of payment of membership/examination/course fees.
- Personal data related to your professional status, your Malaysian Medical Council number, your job title, your practice location, your area of practice, if you are a trainee or if you contact us with a query about your membership, course or library information.
- Personal and contact details you give MintFM/ICGP when subscribing to receive general information from MintFM/ICGP (for example name, role and email address).
- Personal data you provide to MintFM/ICGP when undertaking examinations and assessments administered by MintFM/ICGP, including but not limited to the MICGP

examinations. This may include Special Category Data and Sensitive Data as outlined in the legislation.

- Information we may collect via cookies or similar technology stored on your device about how you use our website.
- Your IP address.
- Information from our web servers about online activity.
- Information you provide if you report a problem with our website or services.

We will collect and process your personal information in accordance with this Policy.

If you make an enquiry via our website, on the telephone or via email, or via any third party, we may collect the information you provide to us, together with any information provided by that third party. We may monitor telephone and written correspondence with you to train our staff and monitor our services.

### **How we use your personal data**

We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

The Personal Data of MInTFM trainees is transferred between Malaysia and the European Union and between the constituent organisations of MInTFM: Irish College of General Practitioners, Royal College of Surgeons of Ireland and University College Dublin Malaysia Campus (RUMC) and iheed Health Training ltd.

### **Your Data Protection Rights**

You have a number of rights which you may exercise in respect of your personal data. If you wish to exercise any of these rights, please email [dataprotection@icgp.ie](mailto:dataprotection@icgp.ie) detailing the right that you wish to exercise together with official documentation confirming your identity such as passport, driving licence. We must respond to you without delay and in any event within one month (subject to limited extensions). You are entitled to lodge a complaint with the Data Protection Commissioner if you are dissatisfied with our response when you chose to exercise any of your rights below. The following are a synopsis of your data protection rights.

Please note we are allowed to refuse your request in certain limited circumstances. If this arises we will inform you.

### **Your rights Under the Legislation**

Your rights under data protection law include the following:

### **The Right to be Informed**

You must be made aware that your information will be processed for purposes you are aware of before it can be processed.

### **The Right of Access**

You may request a copy of all personal data we hold on you in our role as data controller. If you have account, you can access this information via your profile. If you do not have an account, you can do this by sending us an email to [dataprotection@icgp.ie](mailto:dataprotection@icgp.ie).

As well as your personal data, we'll provide you with:

1. The purposes of the processing;
2. The categories of personal data concerned;
3. The recipients or categories of recipient to whom the personal data have been or will be disclosed;
4. The envisaged period for which the personal data will be stored;
5. Your rights, as laid out in this policy;
6. The right to lodge a complaint with a supervisory authority;
7. The source of the data
8. Any automated decision-making in use on your data, including the logic involved, as well as the significance and the envisaged consequences

### **The Right to Rectification**

You have the right to have your data rectified, for example, if it is incorrect or incomplete. You can exercise this right by logging in to your profile. If you do not have an account or wish to amend other data, you can do this by sending an email to [dataprotection@icgp.ie](mailto:dataprotection@icgp.ie).

### **The Right to Erasure**

You may exercise your right to withdraw consent or to request erasure of personal data by logging into your profile and deleting it. If you do not have an account or wish to delete specific data, you can do this by sending an email to [dataprotection@icgp.ie](mailto:dataprotection@icgp.ie). Please note that the deletion may not affect an ongoing recruitment process where the employer has already received the data as part of the recruitment process.

We will inform you of the likely consequences of the withdrawal of consent.

### **The Right to Restrict Processing**

You can request that we keep your data but do not process it further. You can do this by sending an email to [dataprotection@icgp.ie](mailto:dataprotection@icgp.ie).

### **The Right to Data Portability**

You can request a copy of the information you've provided to us in a commonly used format. You can exercise this right by logging in to your profile or by sending an email to [dataprotection@icgp.ie](mailto:dataprotection@icgp.ie).

### **The Right to Object**

You have the right to object to the use of your data for direct marketing purposes and

profiling, should such profiling take place in the scope of direct marketing or our legitimate interest.

### **Rights in Relation to Automated Decision Making and Profiling**

You have the right to not be subject to entirely automatic profiling algorithms. If any such algorithms are used, you have the right to know details of their operation. You can request information about any automated profiling algorithms by sending email to [dataprotection@icgp.ie](mailto:dataprotection@icgp.ie).

### **Links to Other Websites**

This website contains links to other sites that are completely unrelated to ICGP Company Ltd. This Privacy Policy does not apply to these sites nor are we responsible for the content and practices of these websites.

### **Security of Your Personal Data**

Any personal information which the MintFM/ICGP collects about you will be treated with the highest standards of security and confidentiality, strictly in accordance with the Data Protection Acts, 1988 to 2018 and GDPR.

We work hard to protect MintFM/ICGP and our users from unauthorised access to or unauthorised alteration, disclosure or destruction of information we hold.

We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorised access to systems.

### **Retention and Use of Your Personal Data**

Use of your personal data – why and for how long:

We will only process any personal data which you provide to us in accordance with the purpose for which it was provided. If you are an ICGP member or MintFM trainee we will use your personal data to provide MintFM/ICGP services to you in accordance with any agreements entered into between us. For this purpose, we will store your personal data in our Client Relationship Management System ("CRM"); in accordance with the legitimate interests of the College to serve all members and trainees and to promote MintFM. We may send you information by e-mail from time to time about our services that might be of interest to you, updates, white papers and events. Due to the longevity of the life of many of the services that we provide, unless notified otherwise by you we retain your personal data for your length of membership as per our Retention Policy and delete the personal data after this period has expired.

## **Special Category and Sensitive Data**

Where we collect sensitive data for example in connection with examinations or to facilitate event administration it is provided to us by you or on your behalf voluntarily. By giving us this information, you agree that we may use such information as set out in this Notice.

## **MintFM Family Medicine Trainees**

### **Use of your personal data - why and for how long:**

We will only use your personal data in order to fulfil our obligations and responsibilities for the delivery and management of Family Medicine training in Malaysia including the verification of requirements for the Certificate of Satisfactory Completion of Specialist Training (CSCST).

We will retain detailed information for the duration of your training. Subsequently, we will retain summary data for the purpose of specialist training.

### **Who do we share your personal data with?**

We will share your personal data with MintFM, with the training site for the purposes of your employment on the training site, with the Malaysian Medical Council and with any other bodies as may be required for us to operate the training programme.

## **Candidates**

### **Use of your personal data – why and for how long:**

We will only use the personal data provided only for the purpose of determining whether the candidate will become a Family Medicine trainee. We will process the CVs and personal data provided at application stage and recorded in interview notes to take steps at your request prior to entering into GP Training. We will retain this information for the duration of your training and subsequent membership of the ICGP and completion of training with MintFM

If you are not called for interview, or your application is unsuccessful, your Personal Data will be deleted after 12 months.

### **Who do we share your personal data with?**

CVs, applications and interview notes are shared with the assessor's/interview panels and relevant processing staff only.