

ICS Skills Online Privacy Policy

- **Introduction**

ICS Skills takes the protection of your personal data very seriously and are committed to protecting it at all times. This Online Privacy Policy details how ICS Skills will collect, use and safeguard personal data it receives. There are two ways in which personal data can be obtained;

1. Registering as a co-ordinator/tester
2. Registering as a candidate/student

Information collected will primarily be used to manage coordinator/tester and candidate/student registrations and to provide support for e-learning and testing purposes. ICS Skills will not share information you provide us without your consent, unless we say so in this Privacy Policy, or when we believe in good faith that the law requires it. By registering with ICS Skills you are entering into a contract as a coordinator/tester or candidate/student for certification and training.

ICS Skills fully respects your right to privacy and will not collect any personal information about you on this website without your explicit permission (where applicable). Any personal information which you volunteer to us will be treated with the highest degree of security, integrity and confidentiality, in accordance with our obligations outlined under the General Data Protection Regulation (GDPR), the Irish Data Protection Acts 2018, Electronic Communication Regulation and other similar legislation.

By accessing our websites and availing of our services, you agree to this Privacy Policy and to be bound by our terms of use.

- **What information do we collect and how is it used?**

When you avail use of our website(s) for registering for tester training or registering for a course; the following information may be collected;

1. Names and email address(es)
2. Home or work address
3. Phone number(s)
4. Previous Test Administration Experience
5. Relevant Qualifications in Computing
6. Relevant Experience in Computers
7. Survey responses (where relevant).
8. Gender
9. Date of Birth

ICS Skills does not collect any **Special Categories of Personal Data** (this includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions,

trade union membership, information about your health and genetic and bio-metric data). Nor does it collect any information about criminal convictions and offenses.

- **New Registrations**

When a new user registers on our website or a website affiliated with us, a login account will be created for one or more of the purposes outlined below;

1. registration for programs and services
2. registration for events or courses online
3. payments and transactions
4. subscriptions to publications or newsletter
5. participation in online surveys, submitting questions or comments
6. requesting for information or materials.
7. Certification

- **Communication**

It should be noted that the primary mode of most communication is email and the majority of communication from the ICS Skills shall be availed of through this medium. Where required, other modes (e.g. communication via post/phone) will be considered. Certain communication are mandatory under the terms and conditions of your contract. Other optional communication will contain an “unsubscribe” link for those who wish discontinue communication at any time. To opt out of future emails and newsletters, click the "unsubscribe" link at the bottom of any email or e-newsletter from us. You can also contact dpofficer@ics.ie

Soft opt-in: Where processing of your personal data is based on consent, we may also avail of soft opt-in, a process where we market products or services to you, which are related to the services we provide, as long as you do not actively opt-out from such communication. We would like remind you that you have the right to withdraw your consent at any time.

Children -- We do not knowingly solicit data online from or market online to children under the age of 13.

Your Rights

GDPR as well as the Irish Data Protection Act 2018, provides you with the right to know how personal data held about you by us is used. Outlined below are your rights as defined under the Regulation,

- You have the right to find out if we are processing your personal data. This is known as the right to establish the existence of processing.

- You have the right to access your personal data held by us. You can request for a copy of your personal details by writing to us using the address at the bottom of the page. You can also formally email us at dpofficer@ics.ie. Please note that all access requests received via email will be responded to in like manner unless otherwise agreed.
- You have the right to be informed that your personal information is being collected fairly, for one or more limited lawful purposes. You will be provided with;
 - a) details of who holds your data
 - b) what your data is being used for
 - c) why it is being used
 - d) any other information relating to your personal details.
- You have the right to rectify or amend your personal details particularly in instances where inaccuracies exist. Factually, incorrect data can be rectified however; it is your responsibility to provide us with accurate and truthful personal information. ICS Skills will not be held liable for any information that is provided to us that is incorrect.
- You have the right to request erasure of your personal data where one of the following condition applies;
 - You withdraw consent to processing of your personal data and there are no subsequent grounds for further processing. We will retain your personal data where we have an obligation to comply with a legislative requirement (e.g. we will retain transactional information for seven years in compliance with requirement under the Finance Act);
- You have the right to prevent use of your personal details. You have the right to refuse your data to be used for other purpose(s) e.g. statistical analysis or research.
- You have the right to prevent use of your personal data for direct marketing purpose.

How Do I Request Access to My Details?

Where inaccuracies exist, you can update your personal details using your ICS Skills account or contact dpofficer@ics.ie. Also, you can formally initiate a subject access request by writing to us at the address below. We will engage with you to ensure that your request is adequately and promptly addressed.

We have an obligation to respond to your request within **1 month** from the date of receipt of your request. The first request shall be **free** but subsequent requests may incur a charge. Depending on the nature of the request and the volume of request, there are situations where processing of your access request may take longer than the one month allowable response window as define under GDPR as well as the Data Protection Acts 2018. Where this is the case, we will inform you within the first month that the request will take longer.

You are also required to provide us with one form of identification such as a copy of your passport or driver's license. It will be destroyed once the subject access request has been honored.

To facilitate and speed up your request, you are advised to provide as much information as possible. Requesting for "all information" may be deemed disproportionate and can result in unnecessary delays to your request. If you require specific information, please be clear about the information you require.

You can contact us via email at dpofficer@ics.ie or alternatively you can write to;

*Data Protection Officer,
ICS Skills,
87-89 Pembroke Road,
Ballsbridge,
Dublin 4.
D04 R266.*

Disclosures

All information you provide to us will be treated in the strictest confidence in line with national and EU data protection laws, unless mandated by law or with your explicit consent, where appropriate. ICS Skills will not disclose any personal or personally identifiable information about you to a third party under any circumstances unless;

- disclosure reasonably necessary to perform a service or deliver a product or publication;
- you have given explicit consent
- disclosure permitted under this Privacy Policy;
- disclosure is required by statute, regulation or court order
- such disclosure is in the good-faith belief that such action is necessary to:
 - conform to legal requirements or comply with legal process served on the ICS Skills ;
 - protect and defend the legitimate rights of the ICS Skills
 - protect the personal safety of ICS Skills personnel or members of the public in urgent circumstances;
 - enforce our Privacy Policy.

Online Activity Tracking Using Cookies

ICS tracks website usage by both anonymous visitors and registered users who interact with the ICS website, using "cookies." A cookie is a small file or string of text on the site user's computer that is used to aid Web navigation.

We use the following different types of cookies to monitor web activity:

Web Beacons

A web beacon operates as a tag that records visitors to a particular web page on our website after clicking through from an ICS Skills related advertisement on another website or email. Web beacons provide an ability to produce specific profiles of user behavior by collecting limited non personally identifiable information. For example, beacons are used to count the number of users who;

1. visit our website(s),
2. avail use of our services and applications.

It is not possible to refuse the use of web beacons as they are used in conjunction with cookies. However, because they are used in conjunction with cookies, they can be effectively disabled in the browser by changing the settings to restrict or block cookies.

Mandatory Cookies

Mandatory cookies enhance your browsing experience and are also required for the effective functioning of our website(s), services and applications. For example, cookies will allow you access to the members secure page and also remember the number of continuous professional development (CPD) credits you applied for.

Functionality Based Cookies

Functionality based cookies allow our website(s), services and applications to remember choices and preferences that you make (e.g. when you login) and provide more personalised features during browsing. These cookies can also be used to remember customisable changes made by you. This information is usually anonymised and cannot track your browsing activity on other websites.

Performance Based cookies

Performance based cookies collect information about how visitors and members use our website(s), services and applications. Cookies of this nature typically do not collect personally identifiable information. All information these cookies collect are by default aggregated, anonymous and used to improve the way our website(s), services and applications work.

The table below explains the cookies we use and why:

| Cookie Type | Purpose |
|------------------|--|
| Google Analytics | These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. Click here for an overview of privacy at Google . To opt out of being tracked by |

Google Analytics across all websites visit
<https://tools.google.com/dlpage/gaoptout>.

CMS session
cookie

This cookie is set by our content management system upon user login and stores the current user session. Unless requested otherwise at user login it is removed at the end of the user session.

Information Security

ICS Skills has taken measures to protect and safeguard the integrity of your data by implementing appropriate technical and security measures to protect your personal data against unauthorized access to, unauthorized alteration, disclosure or destruction of data. Access to personal information is restricted to ICS Skills employees and partners on a need to know basis in order to operate, develop or improve our services. These individuals are bound by confidentiality and contractual obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Safeguarding Information

ICS Skills understands the importance of technical and online security, and as such has taken a number of steps to enhance the protection of personal information sent to or from ICS Skills over the Internet. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. Accordingly, and despite our efforts and best of intentions, ICS Skills cannot guarantee or warrant the security of any information you transmit to us, or to or from our online products or services.

Links to Non ICS Websites

Please be aware that despite efforts and measures we have taken to protect personal data, other Internet sites that link to the ICS Skills sites or to an ICS Skills email may contain online privacy provisions that differ from these. To ensure your privacy is protected, we recommend that you review the privacy statements of other Internet sites you visit.

Changes to the Privacy Policy

ICS reserves the right to amend this without notice to end users at any time, for any reason, and will signal a change by revising the "Last updated" date at the bottom of this page.

Statement Changes

We may occasionally update this privacy statement to reflect regulatory changes or industry best practices. Therefore we would suggest you periodically review this statement to stay informed about how we are meeting our obligations under the Data Protection Acts. Your continual use of the service constitutes your agreement to this privacy statement and any updates.

Fraudulent Emails Warning

From time to time, you may be contacted by our support team for housekeeping purpose. ICS Skills will never ask you to provide your password by email or other medium. If you receive any emails purportedly from the ICS requesting for such information, do not respond to such requests. Instead, please contact us by telephone (01-2377799) or email (dpofficer@ics.ie) immediately.