



**CHARTERED
ACCOUNTANTS
IRELAND**

Online Learning

Personal Data Protection & Privacy Policy

1. Introduction

1.1. Online Learning

Chartered Accountants Ireland (the Institute) introduced an Online Learning platform for all students in October 2020.

This platform will be used to deliver the CAP 1, CAP 2 and FAE modules remotely to students for the academic years 20/21 and 21/22 and possibly thereafter dependent on the ongoing impact of the covid-19 pandemic.

The Online Learning environment will be used to deliver all learning content and for any communications required to deliver the courses. It will provide the following benefits to students:

- (i) Content will be in one place and be easily accessible;
- (ii) Students will be able to access their learning materials and classes from anywhere, anytime, rather than have to gather for in-person classes;
- (iii) Students will be able to communicate questions to Lecturers directly through the platform whenever they arise;
- (iv) Students will receive all of their class notifications from within the platform;
- (v) Students will be able to see their class timetables and upcoming events in the one place;
- (vi) Progression students will be able to easily access content from previous years, as a reference, while they continue their studies; and
- (vii) Exemption students will have reference access to their exempt subjects while continuing to study their other subjects.

Students will be able to access their online learning environment from within their Student Portal on <https://charteredaccountants.ie>.

1.2. Document Purpose

This document provides information to students and their Training Firms, on the data privacy practices employed by the Institute in the management of student data within the Online Learning platform.

1.3. Institute Commitment

The Institute is committed to meeting its obligations as a controller within the meaning of the GDPR. This commitment is described in the Institute's general data privacy statement (found [here](#)) and extends to the personal data processed on behalf of students who are making use of the Online Learning platform.

The Institute has also put in place Data Processing Agreements ("DPAs") with any third parties involved in the processing of student personal data as part of the delivery of online learning and carries out regular reviews to ensure that these third parties comply with the standards set out in the DPAs and GDPR requirements generally. The third parties involved in the processing of student data are:

- Synergy Learning who host the server on which the Learning Hub runs;
- Acclivity CRM, who help the Institute with the development of reports; and
- Tableau, who provide reporting tools and host reports for the Institute.

2. Data Processing

2.1. Legal Basis

The Institute introduced a fully online learning curriculum in October 2020 in response to the covid-19 pandemic. The pandemic meant that the Institute was unable to guarantee class room-based learning on an ongoing basis throughout the academic year 20/21 and class room-based learning continues to be impractical.

The Institute has also noticed a trend in recent years for students to not attend class but to watch the class session recordings later to catch up.

The Institute recognised the reality of this shift away from classrooms and specifically reengineered the content and the format of the programme for online learning.

Furthermore, in the absence of a learning management system in previous years, the content was spread throughout the student portal and there was regular feedback that students found it hard to find the things they were looking for. There was also no formal communications system which could be used to communicate with lecturers where they were not available in person.

For these reasons and because of the successful first year of online learning the Institute has decided to continue delivering its education services via the Learning Hub for the academic year 21/22.

The legal basis for the processing of the student's data is to allow the Institute to deliver on its contractual obligation to educate the students to the highest standard possible. This contractual relationship exists both with the students directly and in most cases with their sponsoring employer, their Training Firm.

2.2. Data collected

The following personal data is used by the Institute for the purpose of supplying the education function:

- Student Number
- Name
- Email address
- Subjects the student is undertaking;
- Any exemptions the student has been granted;
- The employer of the student;
- The type of contract a student is studying under;
- Whether the student is an ROI or NI resident;
- The content accessed by a student;
- How much of an element of content a student engages with and whether they complete that;
- Assignment scores students achieve;
- IP Address from which the student accesses the platform;
- Log files containing records of systems access;
- Browser and Operating System of the user's device; and
- Cookies choices and cookies are placed on the student's device.

Information pertaining to a student's identity is collected during the Institute's student registration process and is updated if and when a student updates their personal details in the Student Portal. The

data identified above is required to be provided in line with the Education Rules & Regulations (click [here](#)) in order for students to complete their examinations and is collected every year.

Engagement data is recorded during a student's interaction with the platform and is used primarily for reporting on a student's engagement with the programme where the student is sponsored by a Training Firm. It is also used to monitor how the programme is performing and to identify improvements which could be made.

Attendance data is recorded when a student registers and attends a webinar. This information is also used to track a student's engagement with the programme, to monitor the performance of the programme and to identify improvements.

No special category information relating to health or reasons for Reasonable Accommodation, or any other special category data is collected or retained on the Learning Hub..

2.3. Purpose of processing

The personal data of the students is used to enrol them on subjects within the Online Learning platform, to identify them as they progress through the programme and to communicate educational notifications to them during the academic year.

The following data is processed for these purposes:

- Student number;
- Student name;
- Student email address;
- Subjects to which a student is enrolled;
- Contract type a student is studying under;
- Whether the student is an ROI/NI resident;
- Where a student is exempt from a subject, repeating, an external or a member enrolled on an FAE elective;

The following data is collected for reporting to a sponsoring Training Firm¹

- Sponsoring Training Firm where relevant;
- Attendance at webinars;
- Assignment scores;
- Engagement² with the programme's content;
- How much content a student has engaged with in comparison to their peers;

The following data is collected to help the Institute analyse the performance of the programme and identify improvements:

- Engagement metrics for students;
- Assignment scores for students;

The following data is collected to understand the platforms used by students and to ensure the Online Learning environment continues to meet their evolving technical needs:

- IP address and other device identifying information, e.g. browser and operating system;
- Cookies are placed on the student's PC

¹ Please note students on flexible contracts, who have no sponsoring Training Firm will not appear on such reports.

² Engagement refers to reading, reviewing educational content or completion of assignments and quizzes

The following data is collected for troubleshooting purposes should any problems occur:

- Log files containing records of systems access;

2.4. Data Retention

Personal data is retained only for so long as it is needed to support the education and examination of the Institute's students.

The following data is held within the Online Learning platform for one year after a student last engaged with the Institute or for up to 8 years, which is the maximum duration within which a student must have completed their education.

- Student name and student number
- Student Email address
- Employer;
- Whether the student is resident in ROI or NI;
- Subjects upon which a student is enrolled;
- Subjects from which a student is exempt;
- Contract type a student is studying under;

The following data is held for 1 year after the completion of each academic year and thereafter anonymised:

- Engagement metrics for students;
- IP address and other device identifying information, e.g. browser and operating system;
- Assignment scores for students;

The following data is cleared down from the system annually:

- Log files containing records of systems access;

The following data is stored on a student's PC and is not deleted, unless by a user:

- Cookies on the student's PC to ensure the effective operation of the examination software

2.5. Data Location

Data is primarily stored on the Institute's Online Learning Server which is located in Dublin. Management of this server is carried out by staff of the appointed vendor, some of whom are located in Northern Ireland. The Data Processing Agreement has been tailored to provide for the incorporation of Controller to Processor Model Contract Clauses in the event of the UK becoming a third country as a result of Brexit. This is to ensure that the appropriate level of protection is extended to the personal data of all data subjects.

Student engagement data is extracted from the system periodically and is stored on the Tableau Online system for reporting purposes. The Institute configures their Tableau Online instance so that all data is stored in the AWS EU-West region (Ireland).

2.6. Data Transfer

The Institute has contracted a vendor to administer the Moodle platform and in carrying out their duties they could have access to the underlying server and database. Synergy Learning's privacy policy can be viewed [here](#).

The vendor who manages the Institute's Online Learning server is subject to the Institute's Data Privacy procedures and have signed agreements to uphold the Institute's standards and all applicable

legislation in their processing of personal data. Annual audits of processors are completed by the Institute in order to ensure compliance with the contracted standards and general data protection requirements.

The Institute works with Acclivity CRM to produce and format Engagement & Attendance reports and transfers data to Tableau Online for the purposes of hosting the reporting. The Institute entered into Data Processing Agreements with Salesforce (parent company for Tableau) (privacy policy [here](#)) and Acclivity CRM (privacy policy [here](#)). Please refer to the link to the privacy policy for each vendor for further information or you can contact our Privacy Manager privacy@charteredaccountants.ie

3. Data Subject Rights

3.1. Summary

Data subjects have the following rights under the GDPR:

- (i) The right of access to the personal data controlled by the Institute;
- (ii) The right to correct any inaccuracies in the personal data;
- (iii) In some instances, subject to the Education Rules & Regulations and in accordance with the need to provide fair examinations to all Institute students, there is the right to deletion of personal data or to restriction of the processing of the personal data;
- (iv) There is the right to data portability of the personal data; and

The Institute is committed to assisting the data subjects in enforcing their rights where requested. Data subjects can make these requests by contacting the Institute directly.

If you have any query or grievance in respect of our handling of your personal data in any way, you have the right to lodge a complaint to the Data Protection Commission, whose contact details are as follows:

Telephone: 1890 252 231
Email: info@dataprotection.ie
Address: Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2,
D02 RD28, Ireland.

3.2. Contact

Data subjects can contact the Institute in relation to the use of their personal data in the provision of Online Learning or to request assistance in enforcing their rights by contacting the Institute Privacy Manager, whose contact details are as follows:

Email: privacy@charteredaccountants.ie
Address: Privacy Manager
Chartered Accountants Ireland,
Chartered Accountants House,
47-49 Pearse Street, Dublin 2.