



Irish Association for Counselling and Psychotherapy (IACP) – Privacy Notice

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PRIVACY NOTICE

The IACP processes personal information regarding individuals (data subjects), in compliance with the General Data Protection Regulation (GDPR), Data Protection Acts 1988-2018 and any other relevant Data Protection regulations, to protect such information, and to obtain, use, process, store and destroy it, only in compliance with its rules and principles.

This Privacy Notice explains how and why we collect, use, store, share and protect your personal data, and outlines your rights under data protection law.

SCOPE

This Privacy Notice applies to visitors and users of the IACP website (www.iacp.ie) and individuals who interact with IACP online services, including members using our web portal.

PURPOSE

The purpose of this Notice is to ensure that the IACP meets its legal, statutory and regulatory requirements under the data protection laws and to ensure that all personal and special category information is processed compliantly and, in the individual's best interest.



The data protection laws include provisions that promote accountability and governance and as such the IACP has put comprehensive and effective governance measures into place to meet these provisions. The aim of such measures is to ultimately minimise the risk of breaches and uphold the protection of personal data.

The purpose of gathering data include, but is not limited to, the validation and accreditation of members, course accreditation, complaints, organisation and administration of seminars, research activities, the recruitment and payment of staff and compliance with statutory obligations.

WHO ARE WE?

We are the Irish Association for Counselling and Psychotherapy (IACP) of First Floor, Marina House 11-13 Clarence Street Dun Laoghaire, County Dublin. The IACP is the data controller in respect of personal data which we collect and process to provide our members.

This notice sets out the basis on which any personal data we collect from you, or from others, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Our Data Protection Officer (DPO) may be contacted at dpo@iacp.ie.

DETAILS OF PERSONAL DATA PROCESSING

In the course of our business, we collect and process the Personal Data as set out in this Notice. This may include data we receive directly from a Data Subject (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and data we receive from other sources (including, for example, business partners, sub-contractors in technical, payment and delivery services, government bodies and others).

We will only process Personal Data for the specific purposes set out in this Notice or for any other purposes specifically permitted by the applicable law. We will notify those purposes to the Data Subject when we first collect the data or as soon as possible thereafter.

The purpose of gathering data include, but is not limited to, the validation and accreditation of members, course accreditation, complaints, organisation and administration of seminars, research activities, the recruitment and payment of staff and compliance with statutory obligations.

We use third-party platforms and software tools to support our operations, communications and project management. These include Basecamp (project management software), YouTube, Meta, Instagram and LinkedIn. If you message us directly on these platforms, we'll use your details to reply and will not store them elsewhere unless we need to follow up. The platform providers' privacy policies apply to your use of those services.

SCOPE OF THIS PRIVACY NOTICE



This Privacy Notice applies to:

- Visitors to www.iacp.ie
- IACP Members and applicants
- Event attendees
- Course providers and suppliers
- Job applicants
- Individuals who contact us or engage with us via social media or surveys

WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

“**Personal data**” means any information relating to you which allows us to identify you, such as, your name, contact details, payment details and information about your access and use of the IACP’s platform.

“**Special category data**” refers to more sensitive personal data which requires a higher level of protection, such as data relating to your health, religious beliefs, or political opinions. This sensitive data can only be processed under strict conditions.

While registered with the IACP, we collect the following personal data:

| CATEGORY | PERSONAL DATA PROCESSED |
|----------------|--|
| Personal Data | <ul style="list-style-type: none">• Name• Address• Contact details• Date of Birth• Member indemnity insurance details• Copies of certifications |
| Financial Data | <ul style="list-style-type: none">• Membership fees and subscription payments• Event or training fees• Invoices issued and received• Refunds and credits• Payment status and transaction references• Bank account details (for suppliers, staff, or refunds)• Payroll-related payment information (for IACP Staff) |
| Medical Data | <ul style="list-style-type: none">• Member medical details |



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| Criminal Data | <ul style="list-style-type: none"> Garda vetting reports |
| Identity Data | <ul style="list-style-type: none"> Photographs |

The personal data we collect, details of the processing activity and the lawful basis is as follows:

| PROCESS | DESCRIPTION OF DATA, PURPOSE OF PROCESSING AND USE | LAWFUL BASIS |
|----------------------------|---|--|
| Member set-up | <p>name, address, contact details, date of birth, gender, financial information, medical details, garda vetting report, copies of certifications</p> <p>We use this data to set the member up on our systems and to liaise with you about your subscription.</p> <p>When corresponding with us by phone, e-mail or otherwise, we ask you to disclose only as much information as is necessary to provide you with information on your subscription.</p> | <p>Contract – to manage your membership</p> <p>Legal obligation (for Garda vetting and financial compliance)</p> <p>Legitimate interest (for the correspondence)</p> |
| Sales and marketing | <p>name, address, contact details, communication preferences.</p> <p>We use this data to deliver information about our products and services and subscribe you to publications where you have subscribed to receive same; to send you invites to events etc.</p> | Consent / legitimate interest |
| Supply Chain | <p>Supplier (and their employees’) names, contact details, financial information.</p> <p>We use this data to set you up as a supplier on our system; to liaise with you on projects that we are undertaking with you, to provide you with information and to process payment of your invoices etc.</p> | Contract |
| Recruitment/HR | <p>The type of information you may provide in your CV, a cover letter, your name, address, e-mail address and phone number. CVs should include information relevant to your employment history and education (degrees obtained, places worked, positions held,</p> | <p>Legitimate interest (to recruit suitable candidates) and</p> <p>Contract (to take steps before</p> |

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| | <p>relevant awards, and so forth). We ask that you do not disclose sensitive personal information (e.g., gender, height, weight, medical information, religion, philosophical or political beliefs, financial data) in your application.</p> <p>We use this data to screen candidates, to assess suitability for roles and to make offers to successful candidates.</p> | entering into an employment agreement). |
| Website data | <p>We collect data from cookies on our website. See our cookie policy for more information</p> <p>We use this data to administer and improve our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; as part of our efforts to keep our website safe and secure; to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.</p> | Legitimate interest and/or consent – depending on Cookie use |
| Special category data collected | We can collect medical details from our members | Explicit consent/legal claims |
| Annual survey and research feedback | <p>We may invite members or stakeholders to take part in annual surveys or feedback exercises to help us understand satisfaction, improve our services, and inform policy or professional development.</p> <p>Participation is always voluntary. Surveys may collect your name, contact details, role, and opinions about IACP services. Some surveys may be anonymous; where they are not, we use responses only for analysis and reporting.</p> | Legitimate interest (to evaluate and improve our services and operations) |
| Events | We collect your name, contact details, booking/register information, payment details (if applicable), and communication preferences to organise and manage IACP events. This includes | Contract (to manage event registration and attendance), Legitimate interest (to run and improve |



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| | registering attendees, providing access to venues or online platforms, sending event information or reminders, etc. | events and communicate essential updates), Legal obligation (for accounting or health and safety compliance), and Explicit consent (for photography, recordings, or any health information you choose to share). |
| Social media | <p>We maintain pages on platforms such as Basecamp, Meta (including Facebook and Instagram) and LinkedIn. If you contact us via these platforms, your data is processed in accordance with the platform's privacy policies.</p> <p>We do not extract or reuse social media data for other purposes unless necessary to respond or follow up.</p> | Consent |

When you become our member the processing of your personal data, will become a condition of the contract between us as we require certain information in order to be able to provide you with our services (e.g. contact information). In those circumstances, if you do not provide your information when requested, we may be unable to provide our services to you.

OBLIGATIONS AS DATA CONTROLLER

Anyone processing personal data must comply with the six Data Protection principles of good practice. These provide that personal data must be:

- Be obtained and processed lawfully and fairly.
- Be collected and kept only for specified, explicit and legitimate purposes and not be used or disclosed in a manner incompatible with those purposes for which it was given to you initially
- Be protected against unauthorised access, alteration, disclosure or destruction, or unlawful processing.
- Be accurate, complete and where necessary, kept up to date.
- Be adequate, relevant and not excessive in relation to the purpose for which they were collected.
- Not be kept for longer than is necessary.

WHAT INFORMATION ABOUT YOU DO WE OBTAIN FROM OTHERS?

When you use our services, we may obtain the following categories of personal data from others:



[BACP Membership, ACA Membership, IAHIP Membership, Garda Vetting Disclosures from the NVB]

WHO DO WE SHARE YOUR DATA WITH?

We share your personal data with our selected business associates/ suppliers and contractors to provide you with our services/products. For example, these business partners may include our web hosting provider and our IT service providers.

In addition, we may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or substantially all of our assets are acquired by a third party, in which case information held by us about our customers will be one of the transferred assets.
- If we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights, property, or safety, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We attach at **Schedule 1** a list of all data processors, who process data on our behalf, with whom your personal data is shared

HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?

We only collect the amount of personal data that is necessary for us to fulfil our obligations as your Service provider, Contractor or employer. We will only keep that data for certain periods. The time periods for which we retain your data depends on the type of personal data and the purposes for which we use it. We will keep your personal data for no longer than is required or permitted.

For further information on the periods for which your personal data is kept, contact our DPO on the details at the bottom of this policy.

DO WE TRANSFER YOUR INFORMATION OUTSIDE THE EUROPEAN UNION OR EUROPEAN ECONOMIC AREA?

Yes, we transfer data to the Australian Counselling Association (ACA)

The data that we collect from you may be transferred to, and stored at, Australia, outside the European Economic Area (“EEA”) for which there is not an adequacy decision relating to the safeguards for personal data from the European Commission.

We have put appropriate safeguards in place to protect your information by way of signed Standard Contractual Clauses (“SCCs”). Each 3rd party applicable will enter into an SCC with us to ensure your data is protected at all times.



DATA SECURITY

We will process all personal data we hold in accordance with our Data Security Policy.

We will put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to a data processor if he agrees to comply with those procedures and policies, or if he puts in place adequate measures himself.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

WHAT ARE YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA?

You have the following rights:

- to request access to any Personal Data held by us relating to you (a “Data Subject Access Request”). To make a Data Subject Access Request, please email us at dpo@iacp.ie
- to have any inaccurate or misleading data rectified, corrected or erased (subject to certain statutory restrictions).
- to restrict the processing of Personal Data in certain circumstances.
- not to be subject to a decision based solely on automated decision-making including profiling (subject to certain statutory restrictions).
- to data portability, which allows individuals to move, copy or transfer Personal Data from one IT environment to another. You can request to obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and move it.
- to object to processing of Personal Data based on public interest grounds or based on legitimate interest of the data controller (subject to certain statutory exceptions).



- where your data is processed based on your consent, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of processing based on consent before your consent was withdrawn.

Please note that these rights are not absolute rights and may be subject to statutory restrictions.

To avail of any of the rights set out above, you may write to us at the address above or by email at: dpo@iacp.ie. Suitable proof of identification may be required before a request can be processed.

You also have the right to make a complaint to a supervisory authority. You may contact the Irish Data Protection Commissioner. Contact details for the Irish Data Protection Commissioner, as well as information on the relevant Data Protection Laws and Regulations, may be found at the Data Protection Commissioner's website www.dataprotection.ie.

WHAT WILL HAPPEN IF WE CHANGE OUR PRIVACY NOTICE?

This notice may change from time to time, and any changes will be posted on our website and will be effective when posted. Please review this notice each time you use our website or our services. This notice was last updated on 25/03/2026

HOW CAN YOU CONTACT US?

Our DPO can be contacted by emailing to dpo@iacp.ie or phoning us at 01-2303536

Data Protection Officer

IACP

First Floor, Marina

House 11-13

Clarence Street

Dun Laoghaire

County Dublin

Or dpo@iacp.ie



SCHEDULE 1

We have set out below a list of third parties with whom we share your data.

| <i>Third party name</i> | <i>Description of services provided</i> | <i>Transfer Mechanism for ex-EEA transfers</i> |
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| BACP | Reciprocal membership verification under formal agreement between IACP and BACP. | UK adequacy decision under Article 45 GDPR (no SCCs required) |
| ACA | Reciprocal membership verification and professional recognition arrangement. | Standard Contractual Clauses (SCCs) in place (Australia does not benefit from an EU adequacy decision). |
| SalesForce | Cloud-based Customer Relationship Management (CRM) system used to manage membership records, accreditation data, complaints administration, communications, events, and operational records. | Where data is processed within the EEA, no transfer mechanism is required. Where data is accessed or transferred outside the EEA (e.g., to the United States), Standard Contractual Clauses (SCCs) and supplementary safeguards apply. |
| SurveyMonkey | Online survey and feedback platform used for member surveys, research and stakeholder engagement. | SCCs and supplementary safeguards apply where data is transferred outside the EEA (including US infrastructure access). |
| MailChimp | Email communications platform used to distribute newsletters, member updates and event invitations. | SCCs and supplementary safeguards apply. May also rely on EU-US Data Privacy Framework certification (if applicable). |

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| Laya Healthcare | Private health insurer. Membership verification is provided where required for clients claiming reimbursement under their insurance policy. | Not applicable - processing takes place within the EEA. |
| Irish Life | Insurance and/or pension provider where applicable for employee benefits or membership-related schemes. | Not applicable – processing takes place within the EEA. |
| Gardaí/Solicitors | Statutory authorities and legal advisers involved in complaints handling, regulatory compliance, legal proceedings or safeguarding matters. | Not applicable – processing takes place within the EEA. |
| VOSoft | Event registration and booking platform used to manage seminar and training registrations. | Where data is hosted or accessed outside the EEA, SCCs apply. |
| Character Print | Printing and mailing services (e.g., membership materials, communications). | Not applicable – processing takes place within the EEA. |
| Enclude | Salesforce CRM helpdesk and embedded support services, including case support (remote and/or onsite), system troubleshooting, minor system adjustments and enhancements, and SMS service support. | Not applicable - processing takes place within the EEA. |
| Therapy Academy | Training and professional development partner. Limited membership verification or event-related data shared where required. | Not applicable – processing takes place within the EEA (unless otherwise agreed). |
| IACP Complaints Extern | External complaints or professional conduct | Not applicable – processing takes place within the EEA. |

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| | support services where required. | |
| Keith Walsh Solicitors | Legal advisory services including complaints, regulatory or employment matters. | Not applicable – processing takes place within the EEA. |
| Hackett’s Printers (accreditation certificates) | Printing of accreditation certificates and official documentation. | Not applicable – processing takes place within the EEA. |
| Hospital Saturday Fund | Insurance reimbursement verification where required. | Not applicable – processing takes place within the EEA. |
| Irish Life | Insurance and/or employee benefit provider. Processes employee or member insurance-related information where applicable (e.g., group schemes, benefits administration, claims verification). | Not applicable – processing takes place within the EEA. |
| New Ireland (Pension) | Administration of employee pension schemes, including processing of salary, contribution, and employee identification details. | Not applicable – processing takes place within the EEA. |
| Finlay & Mulligan (payroll) | Payroll processing and statutory employment reporting services. | Not applicable – processing takes place within the EEA. |
| Countdown Ireland | Event management and/or venue services provider assisting with the organisation and administration of seminars, conferences or professional events. | Not applicable – processing takes place within the EEA. |
| Tusla | Statutory authority involvement where required by law (e.g., | |

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| | safeguarding or regulatory matters). | |
| Xero – accounting | Cloud-based accounting software used for financial administration and reporting. | Where data is accessed or transferred outside the EEA, SCCs and supplementary safeguards apply. |
| DEXT – accounting | Digital expense and invoice management system integrated with accounting software. | Where data is accessed or transferred outside the EEA, SCCs apply. |
| Sentenial - IT | Payment processing and direct debit management services. | Where data is accessed or transferred outside the EEA, SCCs apply. |
| World Pay - banking | Payment processing provider for card and online transactions. | Where data is accessed or transferred outside the EEA, SCCs apply. |
| Azets Audit Services Ireland Limited | External audit and financial compliance services. | Not applicable – processing takes place within the EEA. |
| Basecamp | Cloud-based project management and collaboration software used for internal project coordination, complaints handling administration, operational management, document sharing and internal communications. | SCCs and supplementary safeguards apply (US-based provider). |
| Nostra | IACP Outsourced IT Dept. | Not applicable – processing takes place within the EEA. |