

TRIPLE P – POSITIVE PARENTING PROGRAM[®]

PRIVACY NOTICE

GREYSTONES & DELGANY (IRELAND) PROJECT

Effective from 01/07/2024



for every parent

PRIVACY NOTICE

TRIPLE P GREYSTONES & DELGANY PROJECT

The Triple P Group (“TPG”) is committed to upholding principles of privacy and data protection. We are providing you with this Privacy Notice, to tell you about the information we will collect from you if you participate in our 2024 project to provide free access to Triple P to parents in the Greystones & Delgany areas of Ireland. This Privacy Notice explains who we are, why we are collecting your data, as well as how we will use, store, share and safeguard your data.

WHO WE ARE

Triple P UK Limited (“TPUK”) is a British company (our postal address is BM Box 9068, London, England, WC1N 3XX). We are part of a corporate group (The Triple P Group or “TPG”) which is comprised of our related bodies corporate, including, the Australian Triple P International Pty Ltd (“TPI”) whose postal address is PO Box 1300, Milton, QLD, Australia, 4064. Our corporate group is responsible for disseminating the Triple P-Positive Parenting Program® (“Triple P”) throughout the world. Triple P was developed by Professor Matthew Sanders and colleagues at The University of Queensland in Brisbane, Australia. Triple P is a parenting and family support strategy which aims to prevent behavioural, emotional and developmental problems in children by enhancing the knowledge, skills and confidence of parents.

THE PROJECT

We are offering parents in the Greystones & Delgany areas of Ireland, a unique opportunity to access Triple P for free. The offer includes 3 components:

1. Access to Triple P Seminars (“Seminars”)
2. Access to Triple P Online Programmes (“Online Programmes”)
3. Anonymous feedback survey(s) (“Surveys”)

The Seminars will be delivered in October and November 2024 and parents will be able to access the following Online Programmes for free, between 17 October 2024 and 31 March 2025:

1. Triple P Online (“TPOL”) which is suitable for parents of children aged 0-12;
2. Teen Triple P Online (“TTPOL”) which is suitable for parents of children aged 10-16; and
3. Fear-less Online (“FEAOL”) which is suitable for parents of children aged 6-14 with anxiety.

To deliver this project, we are working with “It Takes a Village” (“ITAV”). ITAV is a community-wide initiative dedicated to the well-being of primary school children in Greystones and Delgany. More information about the initiative is available on their website at [About | It Takes A Village \(ittakesavillagegreystones-delgany.com\)](http://ittakesavillagegreystones-delgany.com). None of your personal data will be shared with ITAV.

THE DATA CONTROLLERS

We are committed to upholding the rights and protecting the personal data of all parents who participate in our Greystones and Delangu Project. TPUK is the data controller of the information collected during seminar registration and via the surveys. TPI is the data controller of information collected and generated through the online programs. The data controllers decide how and why your personal data is processed. If you have any questions about our use of your personal data, please contact our Data Protection Officer by email at dpo@triplep.net or by post.

THE GREYSTONES AND DELGANY PROJECT LANDING PAGE

A landing pages has been created for this project. This is where parents in the Greystones and Delgany area may register for the Seminars or Online Programmes. This web page is designed so people who are eligible can apply to be part of the project. The data captured on our landing page is shared and processed, for administration purposes, with the EU based third-party service provider that manages TPG's websites. We have a legitimate business interest in processing the data in this way.

APPLICATION

This Privacy Notice is specific to the Greystones and Delgany Project. Once you have logged into one of the online programmes, you will be able to access the general Privacy Notice that applies to all our online programs. You only need to read this project specific Privacy Notice. We have included all relevant information here. If you participate in the Project, be registering for the Seminars, by accessing the online programmes and /or by responding to the surveys, you will be taken to have agreed (consented) to the use of your data as set out in this Privacy Notice.

THE PERSONAL DATA WE COLLECT & WHY

If you use participate in the project, you will provide us with your personal data in the following ways:

1. By registering for one of the Seminars.
2. By registering for one of the Online Programmes; and
3. By working through the Online Programme.
4. In addition, the system will generate information that relates to how you are using the online programme (the Online Management System data).

The surveys will be anonymous. Please do not provide your personal data to us, in your response to the survey questions e.g. through a free text box. If you do, we will rely on your consent for our holding that personal data.

Seminar Registration

When you register to attend one of the Seminars, we collect the following personal data:

1. Your first and last name
2. Your email address
3. Your phone number
4. The school your child(ren) attends
5. The details of seminar you have registered to attend

We will use your data for the following administrative and marketing/promotional purposes:

1. Facilitating your attendance at the event.
2. To communicate with you before and after the event. This will include:
 - sending you the Seminar details
 - sending you reminder emails in the lead up to the Seminar.
 - sending you information about the other aspects of the Project:
 - feedback surveys
 - information about how to access the online programmes for free
 - an invitation to share your story (media release).

There are two lawful bases for our processing the data this way:

1. Your consent – by registering to attend one of the seminars, you agree to participate in the project. As such you consent to our sending you information about the other aspects of the Project. This includes sending you information, feedback surveys and inviting you to share your story (media release).
2. Legitimate Interest - we have a legitimate business interest in communicating with participants in the Project, so they get the most out of the offer and so we can collect their feedback

We are asking parents to provide the name of the school their child attends. This information will be processed for the purpose of tailoring our program to specific regions and to track engagement at a community level. We rely on our legitimate interest as the lawful basis for processing this data. We will also process your personal data for the purposes of evaluating and reporting on the Project. We again rely on our legitimate interest to process the data for this purpose. Please note that any reports produced will not contain your personal data. If you agree to share your story, we may include your information in case studies demonstrating Triple P's impact and in presentations to (external) stakeholders. This will only happen if you complete the media release. If you choose to do so, you will be provided with another Privacy Notice that will explain in further detail, how your information will be used.

Online Programme Registration

When you register to use the online programs and activate your access code, we collect the following personal data:

1. Your first and last name
2. Your email address
3. The registration code
4. The school your child(ren) attends
5. Your IP address
6. We ask you to create a password

We rely on our legitimate interest, as the lawful basis for processing your data for administrative support purposes, including:

1. Creating your account to access the online programme.
2. Assisting you if you experience any difficulties in accessing your account.

We will use your data for marketing/promotional purposes, to communicate with you about other aspects of the Project. This will include sending you:

1. Information about the project
2. Feedback surveys
3. An invitation to share your story (media release)

The lawful basis for processing the data this way, is our legitimate interest in communicating with participants in the Project, so they get the most out of the offer and so we can collect their feedback.

We are asking parents to provide the name of the school their child attends. This information will be processed for the purpose of tailoring our program to specific regions and to track engagement at a community level. We rely on our legitimate interest as the lawful basis for processing this data. We will also process your personal data when

evaluating and reporting on the project. We rely on our legitimate interest to process the data for this purpose. Please note that any reports produced will not contain your personal data. If you agree to share your story, we may include your information in case studies demonstrating Triple P's impact and in presentations to (external) stakeholders. This will only happen if you complete the media release. If you choose to do so, you will be provided with another Privacy Notice that will explain in further detail, how your information will be used.

The IP address is collected for the purpose of identifying fraudulent use of the registration form. We have a legitimate interest in collecting and processing the IP address in this way.

The Information We Collect When You Work Through the Online Programme (Your Responses)

When you work through the program, you will have the opportunity to record your observations, answers to questions and to work through exercises. In doing so, you will provide us with personal data. We hold that data for the purpose of allowing you to work through the program and for you to refer back to your answers and observations. The lawful basis of our holding your personal data in this way, is our legitimate interest, to facilitate effective use of the online program(s). Access to this personal data will be restricted. It may be accessed by teams within TPI such as the IT and digital teams and other teams who access the data while implementing the uses of de-identified data outlined below. Program responses will be de-identified prior to any sharing of data outside the Triple P Group.

Uses of De-identified Data

Once de-identified, the information (which will not contain your or anyone else's personal data) may be used by TPG for various purposes, including but not limited to:

1. Program development; TPG uses a continuous improvement model. It looks for insight into users' interactions with the program, to inform future developments.
2. The marketing/promotion of the online programs and Triple P generally. Aggregate data and/or excerpts may be included in materials such as presentations, proposals or tenders provided to prospective customers. This allows us to demonstrate the online programs' results and the different ways that people are using Triple P and the benefits they experience. Further, we may use aggregate data or excerpts in advertising materials, marketing emails, on TPG websites and/or third-party websites promoting Triple P.
3. Reporting to clients on outcomes from the program.

Sensitive Information/Special Category Personal Data

The questions or exercises within our online programs will not ask for information about you or your family's:

1. Racial or ethnic origin;
2. Political opinions;
3. Religious or philosophical beliefs;
4. Trade union membership;
5. Genetic data;
6. Biometric data;
7. Data concerning health;
8. Data concerning a natural person's sex life; or
9. Sexual orientation

The above types of personal data are treated differently under the GDPR. They are considered to be “special category” personal data, and we are prohibited from processing that data (including recording or storing it) except in very limited circumstances. These include where you have given your express consent.

We therefore ask that you not to enter any special category personal data into the platform (i.e. in your responses to the program). If you, against this direction from TPI, decide to enter either your special category personal data or the special category personal data of a child, where you are the child’s parent or legal guardian, you will be taken to have given your explicit consent to TPI collecting and processing that special category personal data, in line with this Privacy Notice, by your act of volunteering the information (entering it). We will rely on that as the exception permitting the collection/processing of special category personal data under the GDPR, or any other data protection laws that contain similar requirements. The lawful basis of our collecting and processing the data will also be your consent. You can withdraw your consent at any time, by deleting the data from your responses to the online program. You can edit your responses via your program account. Please note that you must not, under any circumstances, enter another person’s special category personal data into the online program, unless it is your child’s personal data.

We also ask that you do not enter any information about criminal history/criminal convictions into the platform.

Your Progress through the Online Program (the Online Management System)

The Online Management System will capture the following information:

1. Your first and last name;
2. Your e-mail address;
3. Your mobile number*;
4. The module you are up to in the program (current module);
5. The topic you are up to within that module (current topic);
6. When you registered for the online program (registration date);
7. The date you last logged into the online program;
8. How many times you have logged into the online program; and
9. When your access to the program will expire (account expiry date).

*Provision of your mobile number is discretionary (except in limited circumstances). You may also choose to provide a mobile telephone number to receive reminders via SMS text messages. In those circumstances, your mobile number will appear in the Online Management System. Provision of a mobile number is only mandatory for participants in specific projects. In those cases it will be collected at registration and appear in the Online Management System.

The Online Management System captures program information, in order to send you reminders and track your progress. For example, the system is designed to send you reminder emails if you haven’t logged into the program in a while. The lawful basis of our holding and using your personal data in this way, is for the performance of a contract, in providing you access to the online program. Further, we have a legitimate interest in collecting information about how users interact with our online programs, for the purposes of continuously improving the programs.

In addition, we may use your personal data to contact you in order to provide you with relevant information, such as program updates, or to seek your feedback including through surveys and testimonials. By using the online program, you consent to our contacting you to seek your feedback. Further, we have a legitimate interest in communicating

with users of our online programs, so that they get the most out of the online programs and so that we can collect their feedback.

You can unsubscribe from receiving both our email and SMS text messaging services at any time, within the settings of your online program account. Occasionally the online program experiences a technical issue which prevents people from subscribing or unsubscribing to emails and/or text messages. Should that occur, we apologise and ask that you contact our Data Protection Officer, who will ensure the issue is promptly addressed.

PAYMENT INFORMATION NOT COLLECTED

The Seminars and Online Programmes are being made available to parents in the Greystones and Delgany are for free. As such we will not be collecting any payment information from parents who wish to participate in the project.

WEBSITE RECORDING

We use Hotjar, a third-party technology service provider, in order to better understand our Online Programme users' needs and to optimise this service and experience. Hotjar helps us better understand our users experience (e.g., how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices (in particular device's IP address (captured and stored only in anonymised form), device screen size, device type (unique device identifiers), browser information, geographic location (country only) and the preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. TPI has a Data Processing Agreement with Hotjar. Neither Hotjar nor TPG will ever use this information to identify individual users or to match it with further data on an individual user. For information about how Hotjar protects the data it holds, please consult their Privacy Statement that is available here: <https://www.hotjar.com/privacy>. We note that the user and usage data that Hotjar collects through its software is stored on the Amazon Web Services infrastructure in the Republic of Ireland (EU). Further information about data storage and compliance with data protection standards is available at <https://help.hotjar.com/hc/en-us/articles/115011639887-Data-Safety-Privacy-Security#data-storage>

HOW WE STORE YOUR INFORMATION

We are doing our utmost to protect your information and have put robust security mechanisms in place for the transfer and storage of your data. The personal data collected from parents participating in this project, is stored in private databases hosted on Amazon's global infrastructure. The individual storage locations are set out in the following table.

DATA SET	STORAGE LOCATION (AMAZON INFRASTRUCTURE)
Triple P Online (programme responses and OMS data)	Republic of Ireland
Teen Triple P Online (programme responses and OMS data)	United States of America
Fear-Less Triple P Online (programme responses and OMS data)	Australia

DATA SET	STORAGE LOCATION (AMAZON INFRASTRUCTURE)
Data collected via the Landing Page (Seminar & Online Programme registration data)	United States of America

In addition to the above, any data contained in emails sent to and within the TPG’s email network, is stored on the Amazon data warehouse in Sydney, Australia.

The data stored with Amazon is encrypted in transit and in backups. TPG believes Amazon has sufficient security mechanisms in place and is appropriate for the storage of our data. The personal data will be encrypted in transit and in back-up. Further information about how Amazon secures the data stored in its data warehouses is available at:

- <https://aws.amazon.com/compliance/>; and
- <https://aws.amazon.com/blogs/security/all-aws-services-gdpr-ready/>.

The registration and demographic data may also be stored on TPG’s private Microsoft SharePoint accounts. TPUK personnel’s files are stored on SharePoint’s infrastructure in the UK. TPI personnel’s files are stored on SharePoint’s infrastructure in Australia. Information regarding how Microsoft safeguards the data stored in SharePoint, is available on its website: [Cloud data security measures in SharePoint & OneDrive - SharePoint in Microsoft 365 | Microsoft Learn](#). We note the section which sets out that they use “best-in-class encryption” for data in transit and also encrypt data at rest.

We are using the third-party email provider, SocketLabs, to send out emails about the project. SocketLabs store data in the United States of America. Information about how they comply with the GDPR is available on their website [SocketLabs and the GDPR](#). We are also using another third-party (Alchemer) platform to collect information via the anonymous feedback survey. The surveys are not capturing personal data so your personal data will not be stored or processed via their platform.

INTERNATIONAL TRANSFERS OF DATA

The personal data collected from you when you register for the Seminars and/or Online Programmes, as part of the Greystones and Delgany Project, will be stored and/or processed in the USA, Australia, UK and elsewhere in the world. By choosing to participate in the Project, you agree to the use of your personal data as outlined in this Privacy Notice, including the international transfer/storage/processing of your data to/in countries other than your own, including countries who do not have comparable data protection laws and as such do not provide comparable levels of protection to the rights of data subjects as is provided under the laws of Ireland.

Whilst we rely on your consent as the lawful basis for the international transfer of your personal data, we also note Amazon, Microsoft and SocketLabs all have appropriate safeguards in place, in line with the EU’s data protection laws. They have included the EU’s Standard Contractual Clauses, in their terms and conditions. If for any reason we are unable to rely on your consent as the basis for the transfer of your personal data out of the EU, we rely on the appropriate safeguard of the Standard Contractual Clauses as the lawful basis for transferring your personal data outside the EU.

AUTOMATED DECISIONS

Automated decisions are decisions made without human involvement. Whilst we utilise some automated actions, for example sending automated reminder emails to online programme users if they have not logged-in in a while, generally your personal information will not be used to make any automated decisions that might affect you.

HOW WE SHARE YOUR INFORMATION

We will always treat your information with respect. We will not sell, rent or license your personal data. Your personal data may be shared within TPG, to the limited number of TPG personnel who need access to perform the processing activities described in this Privacy Notice. For example, to provide you with administrative support. All TPG personnel have undertaken training on the data protection requirements under the EU's data protection laws (the GDPR), which we recognise as the international gold standard. Further, all TPG personnel are subject to confidentiality obligations and are only authorised to process personal data if it is necessary for the performance of their role. We have access restrictions in place regarding the data associated with our online programs, so only authorised personnel have access to your private information. Please refer to the "How We Store Your Information" section above for information about data storage. De-identified or anonymous data may be shared for a variety of purposes, both within and outside of TPG. This information, by its nature, will not contain your personal data. We note that the feedback surveys that will be sent to parents participating in the project, will be anonymous.

Your identifiable personal data may be shared outside of TPG in very limited circumstances, where there is a lawful basis to do so. The lawful basis would be your consent, compliance with a legal obligation or our legitimate business interests.

The University of Queensland – The Creators of Triple P

Some personal data relating to the use of the online programs, may be shared with the University of Queensland's Parenting and Family Support Centre ("UQ"), who are the creators of Triple P. This would not include responses within the program (except in de-identified form). As the global disseminators of Triple P, we have a legitimate business interest to share limited data with UQ.

Service Providers

We may disclose your personal information to service providers where it is necessary for the collection and/or storage of the data. We will disclose your personal data to Amazon and Microsoft, for data storage purposes and rely on our legitimate interests as the lawful basis for doing so.

We may disclose your personal information to service providers where it is necessary for the provision of our services and for running our business. For example, if our in-house IT personnel required the services of IT contractors, database designers and/or developers to maintaining and/or improve the online programme/platform, your personal data may be shared with them. We have a legitimate business interest to use IT industry experts as needed to improve and deliver our services to you. Another example is the use of SMS text message distributors, should you elect to receive program reminders by text message.

In addition, we may disclose your personal data to service providers for communication and/or promotional purposes, such as sending you a feedback survey to collect your opinions and experiences. These service providers may include communications consultants, email distributors and survey software providers whose software is used to capture survey responses. We have a legitimate interest in using third party service providers for this purpose. For this project, we will utilise the following third-party service providers for this purpose:

- Socket Labs (email distributor)
- Alchemer (survey software provider – although we note they will not process any of your personal data)
- Bureau Blanco (the EU based service provider that manages TPG's websites)

We will not provide your personal data to service providers, where we have concerns about their data protection practices. Any Service Provider will be subject to confidentiality obligations and will only be authorised to process your personal data on our behalf and in accordance with our instructions.

Legally Required Disclosures

We may disclose any of your personal data to a third party, including a lawyer, when necessary to enforce our legal rights or if legally compelled to do so by a court or government entity.

HOW LONG WE KEEP YOUR INFORMATION

TPG holds personal data for business purposes and to meet our legal obligations. The registration data collected via the landing page will be held for 1 year + 1 month. The demographic data exported and stored in SharePoint will be held, in identifiable form, for the same period. The retention period for online programme data is different. All users of the online programmes will have access to the platform for a period of at least 12 months. If a longer access period is requested by an individual user, the access period may be extended at TPI's discretion. The personal data will be kept for the duration of that person's access to the online program(s). After access to the online program(s) expires, TPI will retain the data in identifiable form for a period of between 1 and 2 years. In line with our data retention practices, the data will then be deidentified.

YOUR RIGHTS REGARDING YOUR INFORMATION

Under EU data protection laws, you are entitled to certain information and have various rights regarding how we use your data. These include the right to:

- Access the personal data we hold about you;
- Rectification (amend or update the personal data we hold about you if it is incomplete or inaccurate);
- Erasure (destroy/delete the personal data we hold about you);
- Restrict the processing of all or some of your personal data (in certain circumstances);
- Object to our processing your personal data (in certain circumstances);
- Data portability;
- Not be subjected to automated decision making;
- Withdraw your consent; and
- Make a complaint about us to a relevant Supervisory Authority.

ANY QUESTIONS OR COMPLAINTS

For more information about your rights under the GDPR, or if you have any other questions or a complaint, please contact our Data Protection Officer (dpo@triplep.net) or by post (email will allow for a quicker response).

If you wish to contact a Supervisory Authority, their details are below:

- You can contact the UK's Information Commissioner's Office via their website at <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/> or write to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, United Kingdom, SK9 5AF.

- You can contact Ireland’s Data Protection Commission (“DPC”) via their website at [How to contact us | Data Protection Commission](#). Alternatively, you can phone them using the numbers provided on this webpage or write to them at 21 Fitzwilliam Square, South Dublin 2, D02 RD28, Ireland. Please note, the DPC advise that the most effective and efficient way to contact them regarding queries or complaints is by means of the [webforms](#).

UPDATES

We may update this Privacy Notice at any time. The "Effective From" section on the title page lists when this Privacy Notice was last revised. Any changes to the Privacy Notice will become effective when it is published on our website.