Supplementary Privacy Notice for the IOB AI Tutor Service

Effective 1st October 2026

1. Relationship with the IOB Data Protection Notice

The AI Tutor is an optional AI-enabled learning-support service that allows learners to ask questions about approved course materials and receive AI-generated responses with references to relevant source content. The AI Tutor is designed to support learning and does not replace lecturers, tutors, learner-support services or official course materials. The service does not make decisions about assessments, grades, progression, eligibility or disciplinary matters.

This supplementary privacy notice explains how IOB uses personal data when you use the AI Tutor service within the IOB Learning Management System. It should be read together with the IOB Master Data Protection Notice (https://iob.ie/data-protection).

The IOB Master Data Protection Notice contains general information regarding how IOB processes personal data, including information regarding categories of personal data, sources of personal data, lawful bases for processing, recipients, international transfers, retention principles, data security measures, data subject rights and how to contact the Data Protection Officer.

2. What is the purpose of the AI Tutor?

The AI Tutor is provided to:

- support learners with course-related questions;
- improve access to learning assistance outside normal support hours;
- help learners navigate approved course materials;
- provide course-specific learning support within Moodle;
- maintain, operate, improve and evaluate the effectiveness of the service.

The AI Tutor is not authorised to:

- grade or mark work;
- determine admission, progression or eligibility;
- make disciplinary decisions;
- profile, rank or score learners;
- perform emotion recognition or behavioural analysis.

3. What personal data is processed?

Information you provide

- questions submitted to the AI Tutor;
- conversation history within Moodle;
- information you choose to include in your questions.

Course information

- approved course materials;
- course metadata;
- information about resources you are authorised to access.

Technical and operational information

- authentication and access information;
- audit, support and security logs;
- incident reports and service-management records.

Learners should not submit personal, confidential, special-category or criminal-offence data through the AI Tutor unless specifically required and authorised for the learning activity. The service is not intended for that purpose.

4. What is the lawful basis for processing?

IOB relies on Article 6(1)(f) GDPR (Legitimate Interests) for the operation of the AI Tutor. The relevant processing activities are supported by a Legitimate Interests Assessment (LIA).

IOB's legitimate interests include:

- providing AI-enabled learning support;
- improving learner access to course-related assistance;
- operating, maintaining and improving the AI Tutor;
- evaluating service effectiveness;
- maintaining service security and reliability;
- investigating reported issues, complaints and incidents.

IOB has assessed these interests against the rights and freedoms of learners and has implemented safeguards including transparency measures, human support, restricted access controls, role-based administration, data minimisation and rights-handling procedures.

5. How does the AI Tutor work?

The AI Tutor uses a Retrieval-Augmented Generation (RAG) approach.

Approved course content is synchronised from Moodle and converted into searchable content. When a learner submits a question, the service retrieves relevant approved course material and uses AI technology to generate a response grounded in that content. Responses are returned with references to the relevant source materials where available.

You should always verify information against official course materials, which remain the authoritative source. AI-generated responses may be incomplete, inaccurate or out of date.

6. Human review and monitoring

IOB does not routinely monitor all learner conversations.

However, authorised personnel may access selected prompts and responses where necessary to:

- investigate a reported issue or complaint;
- address technical or security problems;
- undertake limited risk-based quality assurance;
- review service performance and safety;
- investigate suspected misuse or incidents.

Access is restricted to authorised personnel with a legitimate operational reason for review.

7. Who receives the information?

Personal data may be processed by:

- IOB staff with authorised access;
- Enovation as the AI Tutor service provider;
- Amazon Web Services (hosting and infrastructure services);
- OpenAI (AI response generation and related AI processing functions);
- Mistral AI (OCR processing of approved course materials);
- authorised support providers operating on behalf of Enovation.

Personal data, prompts, responses and course content processed through the AI Tutor are not used to train AI models. Neither IOB, Enovation nor the AI providers used by the service are authorised to use this information for model training or unrelated product-development purposes without a separate assessment, appropriate transparency measures and any required authorisation.

8. International transfers

The AI Tutor service is hosted within the European Union. AWS hosting is located in Ireland. OCR processing is performed within the European Economic Area (EEA). OpenAI processing for the AI Tutor service is configured using OpenAI's EU data-residency environment.

If any future change results in personal data being transferred outside the EEA, IOB will ensure that appropriate safeguards are implemented in accordance with Chapter V GDPR and will update this notice accordingly.

9. How long is information retained?

Retention periods vary according to the purpose of processing and the location of the information.

Retention may apply to:

- Moodle conversation history;
- operational and security logs;
- incident records;
- complaint and investigation records;
- backup and disaster-recovery records.

IOB operates retention schedules designed to ensure information is retained only for as long as necessary and is securely deleted when no longer required. Further details will be maintained in IOB's Records Retention Schedule.

10. Your rights

Depending on the circumstances, you have the right to:

- obtain information about processing;
- access your personal data;
- request correction of inaccurate data;
- request erasure where applicable;
- request restriction of processing;
- object to processing based on legitimate interests;
- lodge a complaint with the Data Protection Commission.

Because the AI Tutor relies on legitimate interests, you may object to processing relating to the operation of the service. IOB will assess any objection in accordance with Article 21 GDPR. Use of the AI Tutor remains optional and choosing not to use it will not affect access to your course or existing learner-support channels.

11. Further Information

Further information regarding how IOB processes personal data, including information regarding your rights, complaints procedures and how to contact the Data Protection Officer, is available in the IOB Data Protection Notice (at https://iob.ie/dataprotection)