



CLUB PERSONAL DATA PRIVACY POLICY (GDPR Policy)

16 August 2018

1. About This Policy.

1.1 This policy explains when and why we collect personal information about our members and coaches, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy, and as described when we collect data from you (and for which you give formal consent to us).

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website (www.clonakiltyrfc.com) or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the **General Data Protection Regulation (GDPR)** and supporting National Legislation when dealing with your personal data. Further details on the GDPR can be found at the website for the Data Information Commission (www.dataprotection.ie). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

2. Who Are We?

2.1 We are Clonakilty Rugby Football Club (RFC). We can be contacted at:

*Clonakilty RFC
The Vale
Shannonvale
Clonakilty
Co. Cork
P85 DR12*

E Mail: rfcclon@outlook.ie

*Details on the Club and its activities can be found at the Club Website:
www.clonakiltyrfc.com.*

3. What Information We Collect and Why.

3.1 Clonakilty RFC needs to collect and hold personal data on its members, players and coaches in order to effectively run its teams, coordinate club activities and communicate effectively with its members and players as part of our Club Mission to develop rugby at all ages and levels in the greater Clonakilty area. The type of information we collect and hold is detailed in the table below:

Type of information	Purposes	Legal Basis of Processing
Member's name, address, telephone numbers, e-mail address(s).	Managing the Member's membership of the Club.	Performing the Club's contract with the Member. Provision of data for Planning by Club Officers. For the purposes of our legitimate interests in operating the Club.
The names and ages of the Member's dependants where they are listed as Under-Age Members	Managing the Member's and their dependants' membership of the Club	Performing the Club's contract with the Member. Provision of data for Planning by Club Officers. For the purposes of our legitimate interests in operating the Club.
Emergency contact details	Contacting next of kin in the event of emergency	Protecting the Member's vital interests and those of their dependants
Date of birth / age related information	Managing membership categories which are age related	Performing the Club's contract with the Member.
Gender	Provision of Data for Female and Male Rugby Teams Administration Provision of adequate facilities for members.	In order to administer and manage male and female rugby development across the underage and adult sections of the Club. For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender. For the purposes of developing and maintaining diversity data

		for the strategic development of the Club
The Member's name and e-mail address	Creating and managing the Club's online Membership Database.	Consent. We will seek the Member's consent on their membership application form and each membership renewal form. The Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership List maintained by the Club.
Coaches names, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing coaching and instruction at the Club. Data for Development of Coaches and improving IRFU Coaching qualifications.	For the purposes of our legitimate interests in ensuring that we can contact those offering coaching and provide details of coaches' qualifications to members where appropriate.
Name, e-mail address and telephone number of each Club Officer	Information published on Club's website, in Club's newsletter and other publications, in the Club's marketing materials and made available to the Munster Branch and IRFU, in each case as a point of contact at the Club	For the purposes of our legitimate interests in operating and promoting the Club
Name, e-mail address and telephone number of each Club committee member	Information published on Club's website	For the purposes of our legitimate interests in operating and promoting the Club
Employees and representatives of suppliers to the Club	Entering into and managing arrangements with suppliers	Entering into and performing contracts with suppliers

4. How We Protect Your Personal Data.

4.1 We will not transfer your personal data to any other person or organisation without your written consent, or transmit it outside the EU (i.e. outside the jurisdiction of the EU GDPR and National Data Protection Legislation) without your specific written consent.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. This includes both physical password protection of the Club's official IT platform and secure backup of all databases held by the club.

4.3 Custody, Control and Administration of the of the Club Master Database, and the IT hardware on which it is held is restricted to a designated number of Club Officers. These are:

- Club President.
- Club Chairman.
- Club Vice- Chairman.
- Club Secretary.
- Club Treasurer
- Club Membership Secretary. (Club Personal Data Controller).
- Club Data Officer.

The Club Membership Secretary is the designated Data Controller for Clonakilty Rugby Club under the provisions of the GDPR.

4.4 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.5 Data Security Breaches. We will notify you promptly in the event of any breach of your personal data which might expose you or your dependants to serious risk. We will also promptly comply with the requirements of the GDPR to inform the Office of the Data Commissioner (within 72 hours) of any real or suspected accidental or deliberate breach of data security at the Club.

5. Who Else Has Access to the Information You Provide To Us?

5.1 Apart from the Club Officers listed at para 4.3 above, who have access to the Master Database, Individual Team Coaches and Managers are furnished with sections of the Club Database containing appropriate data pertaining to the players (and in the case of Under-Age players, the Parents/Guardians' data) for the purposes of contacting and co-ordinating events for the specific players and support staff of that particular team. In addition the Club Director of Adult Rugby and Club Director of Under-Age Rugby will also have access to the appropriate player data for planning and development purposes. A list of the designated Coaches and Managers who hold these qualified levels (Team/Squad Contact Data) of personal information will be held by the Club Membership Secretary and Club Data Officer.

5.2 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraphs 5.3 below.

5.3 We may also pass your personal data to the IRFU for the purposes of carrying out surveys only when it is in the legitimate interest of the club and the IRFU to do so. The IRFU may use third parties to carry out the surveys but disclose only the personal data that is necessary for the third party to do so and will have a contract in place that require the third party to keep your information secure and not to use it for their own purposes.

6. How Long Do We Keep Your information?

6.1 We will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as it is in the Clubs' legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

6.2 We securely destroy all information once we have used it and no longer need it.

7. Your Rights Explained.

7.1 It is important that you understand what rights you have in respect of the Personal Data and Special Category Personal Data that we hold about you. To let us know that you wish us to exercise any of your rights outlined above please contact our Club Membership Secretary or our Club Data Officer (contact details or email address available on the Club Website or from the Club Officers).

Your rights under GDPR are outlined as:

(a) **The right to be informed (knowing how we will use your data).**

You have the right to be told how we will use your Personal Data, which is set out in this policy.

(b) The right of access (being provided with copies of your data).

You have the right to ask us to provide you with a copy of your Personal Data. We will supply any information you ask for as soon as possible but may take up to 1 month once we are satisfied as to your identity. We will not charge you for this. This is called a data subject access request.

(c) The right to rectification (changing incorrect information we hold).

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. Contact details for any requests can be found above.

(d) The right to be forgotten (erasure) (requesting deletion of your Personal Data).

In some cases, you have the right to be forgotten (i.e. to have your Personal Data deleted from our database).

(e) The right to restrict processing (limiting how we use your data).

In certain situations you have the right to ask for processing of your Personal Data to be restricted because there is some disagreement about its accuracy or legitimate usage.

(f) The right to data portability (moving your data in a useable format).

You have the right to request the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party - in certain situations.

(g) The right to object (when we must stop processing your data).

You have the right to object to us processing data purely for our legitimate interests. If you make such a request, we must stop processing your Personal Data unless: we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or the processing is for the establishment, exercise or defence of legal claims.

(h) The right not to be subject to automated decision making including profiling (making a decision solely by automated means without any human involvement).

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

N.B. Clonakilty RFC does not undertake automated decision making or profiling.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

www.dataprotection.ie

Telephone +353 57 8684800 09:15 - 17:30hrs (17.15
+353 (0)761 104 800 Friday)

**Lo Call
Number** 1890 252 231

Fax +353 57 868 4757

E-mail info@dataprotection.ie

**Postal
Address** **Data Protection
Commission**

Canal House
Station Road
Portarlinton
R32 AP23 Co. Laois

7.3 For further information on each of those rights, including the circumstances in which they apply, please see the Guidance from the Data Commissioners Commissioner's Office (www.dataprotection.ie) on individuals' rights under the General Data Protection Regulation.

If you have any queries, questions or comments on the information contained in this policy document, kindly contact the Club at:

*Clonakilty RFC
The Vale
Shannonvale
Clonakilty
Co. Cork
P85 DR12*

E Mail: rfcclon@outlook.ie