

Suncroft GFC

Personal Data Protection Policy



Data Protection Policy

Data Protection is about your fundamental right to privacy and your right to access and correct data about yourself.

The information below outlines Suncroft GFC's policy to help ensure that we comply with the Data Protection Acts 1988, the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) which govern the collection, processing, retention, use and disclosure of information relating to individuals.

It also intended to inform you of how Personal Information provided will be used, by whom and for what purposes.

Suncroft GFC, the GAA and/or the LGFA, as appropriate, are Joint Data Controllers of Personal Data. If you are unclear on any aspect, or want any further information, please contact Suncroft GFC's club secretary at 'secretary.suncroft.kildare@gaa.ie' or the GAA's Data Protection Officer at 'dataprotection@gaa.ie', or the LGFA's Data Protection Officer at 'dataprotection@lgfa.ie'.

Data Protection Principles

Suncroft GFC shall perform its responsibilities in accordance with the following Data Protection principles. They are:

- Obtain and process personal data fairly.
- Obtain personal data for one or more specified and lawful purposes.
- Use and disclose personal data only in ways compatible with the one or more purposes for which it was obtained.
- Ensure that personal data is adequate, relevant and not excessive in relation to the purpose for which it was obtained.
- Personal data will be kept accurate, complete and up-to-date.
- Personal data will be retained for no longer than is necessary for the purpose(s) for which it is obtained.
- Keep personal data safe and secure.
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to Personal Data.
- A copy of an individual's Personal Data in the possession of Suncroft GFC will be provided to the relevant individual, on request.

Responsibility

Suncroft GFC requires all members to comply with the legislation and this Data Protection Policy. Failure to do so, e.g. unauthorised, inappropriate or excessive disclosure of, or obtaining information about individuals, will be regarded as a breach of this policy and will be dealt with in accordance with the Suncroft GFC's, the GAA's and LGFA's official rules and Code of Best Practice or Code of Behaviour

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Suncroft GFC Obtains and Processes Personal Data that is necessary:

- To register teams, members, players, officials, coaches, mentors and officers with Suncroft GFC, the GAA and/or the LGFA, as appropriate, and for Garda vetting.
- For administrative purposes to contact members, players, player contacts, parents and guardians about club, GAA and LGFA related matters.
- For administrative purposes to coordinate teams, team sheets, referee reports, disciplinary matters, injury reports, transfers, sanctions, permits, statistical purposes and other Club, GAA and LGFA activities.
- To maintain a register of teams, members, players, officials, coaches, mentors, officers contacts, parents and guardians.
- To maintain club records to ensure participation at appropriate age levels and ensure appropriate levels of training and qualifications. Personal Data

Suncroft GFC Necessarily Obtains Personal Data by:

- Collecting and retaining Personal Data as part of the member registration process.
- Collecting and retaining further Personal Data as part of the process of attending courses, training and attaining qualifications, etc.
- Collecting Personal Data as part of the Garda Vetting process.

Sharing Of Personal Data Controlled by Suncroft GFC:

- Suncroft GFC not share Personal Data with any third-party other than as necessary with the GAA, LGFA and An Garda Síochána, or with another party if legally required to do so.
- Within Suncroft GFC, The GAA and LGFA Suncroft GFC will share Personal Data for administrative purposes to coordinate teams, team sheets, referee reports, disciplinary matters, injury reports, transfers, sanctions, permits, statistical purposes and other Club, GAA and LGFA activities.
- Team sheets for all game will be shared with opposing teams, referee's and Kildare county board.
- All Personal Data can be accessed by certain members of the County Boards, Provincial Boards and National administrative functions in the GAA and LGFA. This is only done in accordance with the GAA and LGFA's data protection policies.
- In the event of an injury or injury scheme claim, details of the claim, which will include Personal Data, will be passed to the GAA's and or LGFA's insurance underwriters as appropriate.
- Suncroft GFC will make available a full list of members of Suncroft GFC to members of Suncroft GFC. The personal information on any such list shall be limited to: Name, GAA and/or LGFA identification number, date of birth for all members under the age of twenty-one, address and telephone contact number. The telephone contact number for members under eighteen will be that of a parent and/or guardian or another number specifically agreed with the parent and/or guardian.

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Retention Of Personal Data Controlled by Suncroft GFC:

- Personal Data is retained for the duration of membership and will be deleted in the event that membership is resigned or the member is expelled.
- For underage members, Personal Data of Parents and/or Guardians is retained for the duration of the underage membership. It will be deleted if the membership is resigned or the member is expelled and/or it will be deleted within twelve months of the underage member reaching their 18th birthday.

Storage Of Personal Data Controlled by Suncroft GFC:

- Electronic data is stored in secure systems with current security software and login protections, at table of systems is include on page 4. Any hard copy of any personal data is stored under lock and key always.

Access to Personal Data Controlled by Suncroft GFC:

- All parties have a right to a copy of all their Personal Data held by Suncroft GFC. A copy of Personal Data can be acquired by submitting a request to Suncroft GFC's Secretary. The information will be provided within one month of receipt of the request.

The privacy rights relating to Personal Data Controlled by Suncroft GFC include:

- Suncroft GFC acknowledgement of the personal privacy rights of all its members. E.g. their right to subject access, to have inaccuracies corrected, to have information erased, to object to direct marketing, to restrict the processing of their information, including automated decision-making and data portability.
- Should any individual, or individual's legal representative, parent or guardian, wish to have an issue or issues addressed under their personal privacy rights they should bring it to the attention of the Suncroft GFC's Secretary.

Further information:

- Further information regarding your rights can be obtained through the Office of the Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois, or on the website www.dataprotection.ie

Making a complaint or reporting a breach:

- Should you wish to make a **complaint or report a breach** in relation to your Personal Data, you can do so by emailing the Office of the Data Protection Commissioner using the following email address: info@dataprotection.ie

Suncroft GFC is continually trying to improve its policies and procedures. If you have any suggestions or as to how this policy could be improved please e-mail them to 'secretary.suncroft.kildare@gaa.ie'. If there are any conflicts between this policy document, the GAA or LGFA's policies and procedures or the relevant legislation the latter take precedence.

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The following is a log of processing activities undertaken by Suncroft Gaelic Football Club (Suncroft GFC), as defined under the General Data Protection Regulation											
Suncroft GFC, Askiraw Lane, Suncroft, Kildare (email: secretary.suncroft.kildare@gaa.ie)											
Ref	Processing Activity	Purpose	09/01/2018	Categories of data subject	Categories of Recipient	Format	Location Held	Accessible by	Retention Period	09/01/2019	Third Party Access
			Category of data processed Personal Details including Name, Date of Birth, Address Contact details including Phone Number & Email address	Members & prospective members of Suncroft GFC Adult, Children and Juvenile players, Parents & Guardians.	Membership Forms are used internally within the club only	Paper	Club Registrar and/or club treasurer.	Club Executive	1 year	None	None
1	Membership Forms	To capture personal information and contact details for new and renewing members of Suncroft GFC.			Electronic Membership Forms are used internally within the club. As part of the process of completing the online membership form a hyperlink is created to direct the form filler to PayPal to make the associated payment. No personal data is processed in activating the hyperlink.	Electronic	POWR Inc., 177 29th St, San Francisco CA, 94110, United States of America, E-mails associated with these online membership forms are held in Sharepoint on the GAA's Office 365 environment	Authorised users on the system. These are limited to Registrar, Treasurer and Secretary	1 year	POWR Inc., which is located at 177 29th St, San Francisco CA, 94110, United States of America is the data processor and a contract in place between Suncroft GFC and POWR to manage access.	
2	Online Membership Forms	To create and manage online accounts and to capture personal information and contact details for new and renewing members of Suncroft GFC and to facilitate the payment of relevant membership fees online	Personal Details including Name, Date of Birth, Address Contact details including Phone Number & Email address	Members & prospective members of Suncroft GFC Adult, Children and Juvenile players, Parents & Guardians.	Units within the GAA and LGFA at County, Provincial and National Level Insurance Providers	Electronic	Hosted in BT Data Centre in Belfast	Units within the GAA and LGFA at County, Provincial and National Level Insurance Providers. Club Registrar, Treasurer and/or secretary.	All categories of information are held for the Duration of membership. Contact Details are deleted one year after membership ends Personal Details including Name, DOB and Address are held for 7 additional years	Servasport Ltd of 11th Floor, Causeway Tower, 9A James Street South, Belfast, B12 8DN is the data processor and contracts are in place between the GAA and Servasport to manage access	
3	GAA and/or LGFA Registrations	To register members of Suncroft GFC with the GAA And LGFA on an annual basis for purposes including eligibility, insurance and other club rights. Also to facilitate communications through SMS	Personal Details including Name, Date of Birth, Address Contact details including Phone Number & Email address Membership details including Membership Number	Members & prospective members of Suncroft GFC Adult, Children and Juvenile players, Parents & Guardians.	N/A	Electronic	Vodafone Webtext system	Authorised users on the system. These are limited to Registrar and Secretary	1 year	Vodafone are the data processor for webtext	
4	SMS / Text	To notify Club Members and parents or guardians of Club Members of club events - meetings, matches, training, etc	Personal Details including Name Contact Details including Phone Number	Members and parents and guardians of members of Suncroft GFC	N/A	Electronic	Whatsapp	All members of the whatsapp group	1 year	Whatsapp are the data processor	
5	Whatsapp	To notify Club Members and parents or guardians of Club Members of club events - meetings, matches, training, etc	Personal Details including Name, Date of Birth, Address Contact details including Phone Number & Email address Membership details including Membership Number Proof of Address including Utility Bills Proof of Identity including Passport or Driver's Licence	Members of Suncroft GFC involved in coaching and any non members of Suncroft GFC involved in coaching.	An Garda Síochána The National Child Welfare Office, Crole Park	Paper	These are held in the home of the Club's children's officer.	Club Children's Officer	Duration of Vetting process (typically 2-3 weeks)	None	
6	Garda Vetting - paper based	To facilitate compliance with Child Safeguarding and Welfare legislation	Personal Details including Name, Date of Birth, Address Contact details including Phone Number & Email address Membership details including Membership Number Proof of Address including Utility Bills Proof of Identity including Passport or Driver's Licence	Members of Suncroft GFC involved in coaching and any non members of Suncroft GFC involved in coaching.	An Garda Síochána The National Child Welfare Office, Crole Park	Electronic	These are held in Sharepoint on the GAA's Office 365 environment	GAA Vetting unit	Duration of membership or involvement with the club	None	
7	Garda Vetting - eVetting	To facilitate compliance with Child Safeguarding and Welfare legislation	Personal Details including Name, Date of Birth, Address Contact details including Phone Number & Email address Membership details including Membership Number Coaching Details including qualifications obtained, courses attended and relevant dates	Members of Suncroft GFC involved in coaching and any non members of Suncroft GFC involved in coaching.	N/A	Electronic	These are held in Sharepoint on the GAA's Office 365 environment	Authorised users on the system. These are limited to Registrar, Treasurer and Secretary	Duration of membership or involvement with the club	None	
8	Coaching Register	To record the coaching qualifications of members of the Suncroft GFC			Electronic Purchase Forms are used internally within the club. As part of the process of completing the online membership form a hyperlink is created to direct the form filler to PayPal to make the associated payment. No personal data is processed in activating the hyperlink.	Electronic	POWR Inc., 177 29th St, San Francisco CA, 94110, United States of America, E-mails associated with these online membership forms are held in Sharepoint on the GAA's Office 365 environment	Authorised users on the system. These are limited to Registrar, Treasurer and Secretary	Duration of membership or involvement with the club	POWR Inc., which is located at 177 29th St, San Francisco CA, 94110, United States of America is the data processor and a contract in place between Suncroft GFC and POWR to manage access.	
9	Online Shop	To capture personal information and contact details for persons procuring an item or items from Suncroft GFC.	Personal Details including Name & purpose of booking Contact details including Phone Number & Email address	Members of Suncroft GFC & members of the public who purchase from Suncroft GFC.	Electronic	Electronic					