

General Data Protection Regulation (GDPR)

This document contains important information on members rights under the Data Protection legislation.

Introduction

The following Privacy Information is being provided to you as outlined in the General Data Protection Regulation (GDPR). It is intended to inform you of how the Personal Information provided will be used, by whom and for what purposes.

GDPR is often perceived as a restrictive legislation, however it is designed as a support – to support a functioning economy & society. A reasonable and practical approach therefore underpin data handling.

What is Personal Data?

Any information relating to a living person that could directly or indirectly lead to identifying them, including amalgamated data –

Name, Address, Date Of Birth, Photographic image, Phone number, PPS number, Location data, IP address, Biometric Data, Finger print.

What are the principles of GDPR?

GDPR is based on the following principles

- Lawful, Fairness & Transparent (importantly you must positively consent to us having your data i.e. the default on a form cannot be that you automatically “opt-in”)
- Purpose limited (data is only used for the intended purpose)
- Data minimisation (the minimum amount of relevant data is obtained)
- Accuracy (data records are up to date)
- Storage limitation (data is only retained whilst necessary)
- Integrity & Confidentiality (appropriate security protocols are in place)

Why does the club have my personal data?

In order to efficiently run a functioning club, the club must know who its membership is, and hence certain specific details which identify you. Your membership is your contract with the club. The associated information is held by a designated club person deemed the Data Controller.

Who are the data controllers, and why are there more than one?

Our games are governed by three separate associations – The GAA (catering for male football & hurling), the Camogie Association and the Ladies Gaelic Football Association (LGFA). Our club is therefore affiliated to each of these three separate bodies, and consequently is required to share certain information with each association.

Therefore, the Club and the relevant authority (GAA, Camogie & LGFA) are Joint Data Controllers of the Personal Data in question. The contact details for the Club are as follows: The Secretary, Shankill GAA Club, Shankill, Co. Dublin, email: secretary.Shankill.dublin@gaa.ie.

Who are the Data Protection Officers for the Club and the associations?

Entity	Data Protection Officer	Contact Details
GAA	Gearoid Ó Maoilmhichil	dataprotection@gaa.ie 01 8658600
LGFA	Paula Prunty	dataprotection@lgfa.ie 01 8363156
Camogie	Data Protection Officer	dataprotection@camogie.ie 01 8658651
Shankill GAA	John Doherty	chairperson.shankill.dublin@gaa.ie 086 3215087

What personal data does the Club, and/or the associations hold?

Only basic, high-level data is shared with the governing bodies (e.g. name, gender, DOB & Address). The club will hold additional personal data – examples are given below

- Membership data: name, date of birth, address, telephone number(s), next of kin details
- Financial transactions you process in relation to club membership fees
- Any health-related notes which you have provided (remember this is provided for your safety)
- Attendance at training sessions, matches (where you appear on the team sheet), or other club events e.g. seminars, workshops, meetings, fundraising events etc.
- Names of groups / teams
- Communications where you may be mentioned by name
- Photographs, and although less common voice-recordings (if you participated in an interview or discussion)
- Notes, comments recorded about a player or member

Attendees of the club academy/nursery must be registered for the purpose of insurance, hence the requirement for the club having basic personal data.

Photos or video of juvenile or academy players cannot be taken and cannot be shared by the club on social media or by any other means without the express consent of the parent of guardian of the juvenile or academy member. This consent is captured and documented by the club.

What is “data processing”, and why is it necessary re my Personal Data?

Data processing is another way of saying – “using”, or “handling” data.

The purpose for processing your Personal Data is that it is necessary for the performance of a contract with the Club and the relevant governing bodies – GAA, Camogie & LGFA.

The personal data of all members including senior, juvenile and academy is used for club administrative purposes and activities;

- To register and maintain your club membership (including registrations),
- Teamsheets, and Training/Match attendance lists,
- Communication purposes (parent/guardian for juvenile/academy members),
- Referee reports,

- Disciplinary matters,
- Injury reports,
- Club transfers,
- Sanctions
- Permits, and
- Statistical purposes in relation to the club development (and history)
- Promotion of club events and activities in the community.

The purpose of promotional activities is to keep you informed of club events including fundraisers. We will only use your personal data for the purpose of promotional activities undertaken by the club if you have provided your explicit consent for this (usually by agreement on the registration from).

Will anyone else receive a copy of my Personal Data?

Your Personal Data can be accessed by certain members of the relevant governing bodies - County Boards, Provincial Boards and National Administrative function in Croke Park. This will be done in accordance with our data protection policy only, and pertains to very basic data.

In the event of an injury or insurance claim, details of your claim which will include your Personal Data will be passed to the GAA's Insurance underwriters, Willis Insurance, Elm Park, Merrion Road, Dublin 4, Ireland.

Where is my Personal Data stored?

The club holds physical forms (or scanned versions thereof), where applicable e.g. club membership applications, camp application forms, team sheets and in the instance of coaches/mentors the associated Garda Vetting forms are also retained. Key club officers hold internal, password protected spreadsheets / files – all necessary information in order to properly run the club.

Team coaches may store team members contact details (parents or guardians in the case of juvenile teams) and use services such as text message, phone call, emails etc, in order to contact team members e.g. re training and match schedules or other club events.

As we engage a third party specialist service provider – ClubForce, to collect annual membership and fees associated with club related purchases by members, personal data is by necessity shared with ClubForce.

Additionally your membership data will be stored electronically on the GAA Central Membership Database which is provided by Servasport Ltd, 11th Floor, Causeway Tower, 9A James Street South, Belfast, BT2 8DN.

Who is Servasport Limited?

Servasport Limited is a “data processor” who hosts the database on which your information is stored. They are the official database management company employed by our governing sports bodies through which our membership details are collected by the governing associations to which we are affiliated (GAA, Camogie & LGFA). The club in

turn, have a contract in place with Servasport Limited to ensure your Personal Data is stored safely and securely.

How long will my Personal Data be stored for?

Personal data will be held, at a minimum, for the duration of your membership and it may be deleted by us in the event that you resign your membership or you are expelled in accordance with the official guide. The retention of personal data after membership ceases may also occur where we decide that it is necessary to do so e.g. for the purpose of club history, as well as assisting with club development it may be deemed essential. Note many sports clubs and organisations retain data a period in excess of 100 years.

How can I obtain a copy of the Personal Data held by the Club/GAA/LGFA?

You have the right to request a copy of your personal data. In accordance with the governing legislation we shall endeavour to provide this information to you within one month. Please note that for an initial data request there is no charge, but burdensome requests may incur an administrative fee. It is important that in support of any such request you state the rationale behind this request.

What are my rights relating to my personal data?

You have the right to have your personal data updated, rectified, or erased if you so wish. You have the right to object to your personal data being processed and to withdraw your consent to processing. However, again for practical purposes of running the club, and in line with the governing legislation the club does have the right to retain data, regardless of the request to delete.

Data Breaches - Club Obligation:

A data breach is understood to include any, or all of the following – data destruction, data loss, data alteration, unauthorised access/disclosure.

In accordance with the governing legislation, the club has an obligation to report a breach within 72hrs of it becoming known. The key consideration in relation to a breach is to determine if there is a risk to the individual, if there is no risk, then no breach has occurred.

How do I make a complaint or report a breach?

Should you wish to make a complaint or report a breach under in relation to your Personal Data, you can do so by contacting the Office of the Data Protection Commissioner.

Where can I get further information?

Further information regarding your rights pertaining to personal data can be obtained through the Office of the Data Protection Commissioner, Canal Houpe, Station Road, Portarlington, Co. Laois, or on the website www.dataprotection.ie