# **Mullingar Sailing Club**

# Data Protection Policy and Privacy Policy Revised 12<sup>th</sup> March 2020

"Member" in this document includes all the categories of membership defined in the Club Constitution.

#### The data we will collect

On remaining/becoming a member, the club will need to collect certain information about you which will include your name, date of birth, gender, email address, address, telephone number, details of any coaching or officiating licenses you hold. We will also collect the full name and telephone number of the emergency contact(s) nominated by you, as well as details of injuries or medical conditions as provided by you. You may also choose to provide us with other information. The above is referred to as your Sailing Club Data (SCD).

#### Why we will collect it

We will collect and process your SCD for the purposes of registering you as a member of Mullingar Sailing Club and administering your involvement in the club and the sport of sailing. We will process it on the basis of legitimate interests. The legitimate interests are the interests of registering you as a member and to administer the activities of the Club. We will only use your SCD for the purposes your involvement in the Club and the sport of sailing. You can opt out at any time by notifying us.

#### Guidance on how long the club we will keep your data

We will retain your SCD for such time as you are a member registered with us and will then delete your information on a staged basis as follows:

| Type of Data           | When Deleted   |
|------------------------|--|
| Name, date of birth,   | Three years after an individual has last renewed their membership with |
| gender, email address, | the club.  |
| address, telephone     |  |
| number                 |  |
| Data on any injuries,  | One year or on the receipt of a new club annual membership form or as  |
| medical conditions etc | specifically directed by you if a longer retention period is required  |
| as provided by you to  |  |
| the club               |  |
| Membership forms       | Three years  |
| Vetting data, ID forms | Four years after the receipt of a vetting application or on its expiry |
| and application forms  |  |

| Competition results                             | Indefinite as a record of competition results and for historic archive |
|---|--|
|   | purposes   |
| Summer Camp or other training camp applications | Two years or on the receipt of an amended version/new application      |
| Text or messaging                               | Two years (rolling twelve months)                                      |
| systems   |  |

#### Club use of WhatsApp

WhatsApp groups and messages are used for efficient, quick and casual communication of current and sometimes urgent information between members (e.g. notice of cancellation of sailing due to excessive wind) subject to the following rules and guidelines (which are not exhaustive):

- Written consent as provided for at the foot of this policy is in place from the individual to join/be included in a Group.
- A member can choose to leave a group at any time.
- Only members of Mullingar Sailing Club (MSC) can be in any MSC group.
- At least one committee member should be an administrator of a group.
- Avoid having a conversation that's only relevant to one other person in the group.
- WhatsApp alone is not to be used as a substitute for conveying important formal Club information (e.g. Notices of AGM or EGM)
- Note that not all members are on WhatsApp therefore SMS, email or postal communication should be used where necessary for communication with members who do not avail of WhatsApp.
- Complaints about the use of WhatsApp can be made to the Secretary.
- No person under the age of 18 can be part of a group without parent/guardian consent.
- Group members give permission to allow the sharing of their WhatsApp details with other club members and new members of an evolving group, provided always that no club member, whether or not he/she is a member of a Club WhatsApp group may share the details of any club member (data Subject) with any other person who is not a club member without the specific permission of the member (data subject) concerned.
- Members are advised and encouraged to check and adjust their own privacy settings within WhatsApp to meet their own individual requirements.
- Participation in any WhatsApp group is entirely at the member's discretion.

#### **Sharing your data**

We <u>may</u> share your Data with other sailing clubs for the purposes of competition and event participation.

We <u>may</u> share your Data with sailing partners. We will not transfer your data to any other third parties without obtaining your consent and, where possible, will anonymise your data before sharing.

We will not share any other personal data you provide to us that is not Sailing Club Data.

#### **Privacy policy**

All of the personal data we acquire from you will be collected, stored and processed in accordance with the terms of this privacy policy.

#### **Complaints**

If you have any concerns or complaints in relation to how the club collects and/or processes your personal data, you should contact the Club Secretary in the first instance.

If you are dissatisfied with how your concern/complaint is dealt with by Mullingar Sailing Club you have the right to report your concern/complaint to the Data Commissioner (www.dataprotection.ie).

#### **Breaches of this Policy**

This Data Protection Policy and the Privacy Policy (below) form part of the Club Rules/Code of Conduct. Breaches of these policies may result in the imposition of a sanction by the Club Committee, up to and including cancellation of Club membership. Members are also advised that certain serious breaches of Data Protection and Privacy laws may result in criminal prosecution.

# Mullingar Sailing Club GDPR Privacy Policy

#### Introduction

The website/social media page is maintained by Stuart McCormick on behalf of the CLUB for the purposes of data protection legislation Stuart McCormick is the data controller.

Mullingar Sailing Club is committed to protecting your privacy and processing your personal data in accordance with the Data Protection Acts1988 -2018 and the General Data Protection Regulations (GDPR). This policy explains how the information we collect about you is used and kept securely. It also explains your privacy choices when using our website as well as your right to access your information under Data Protection Legislation.

#### The information we collect about you

We may collect the following information about you through our membership process and our website/social media:

Your name, email address, postal address and any other information you voluntarily provide to us via our online and hardcopy forms for the purpose of registering you as a member of our club or/and entering you in an event that you have chosen to participate in

## The information provided to us

We may be provided with information about you from clubs with which you are registered. That information may include: name, date of birth, gender, email address, address, telephone number, name of the Sailing Ireland affiliated clubs with which you are registered and any coaching qualifications or officiating licenses that you hold.

#### How we use your information

We may use your personal information for a number of purposes, including, but not confined to:

To process and manage your membership.

To deal with your requests and enquiries.

To contact you for reasons related to your enquiry.

To notify you about sailing events.

To notify you about changes to the Club calendar

## Our legal basis for processing your information

We will process your Sailing Data on the basis of the following legitimate interests:

To provide selected external providers with a facility to check and validate data to support administrative processes. For example: To issue confirmation of sailing levels achieved; Transfer of name and date of birth to check membership validation at point of entry to sailing events.

Providing relevant and necessary information via email, text and post to you about the following:

Changes to rules and regulation

Updates to advice and guidance relating to specific roles held within this club

The club may also share your personal information with An Garda Síochána and other Statutory Agencies for the purposes of crime prevention, crime detection or the safety of our members.

This is done on a strictly case by case basis and through a tightly controlled process to ensure we comply with Data Protection Legislation.

#### **Protecting your information**

We will not transfer your SCD outside of the European Economic Area.

By submitting your SCD you agree to its storing or processing. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy. The Internet is not generally a secure medium for communication and therefore we cannot guarantee the security of any information you send to us over the Internet.

#### Finding out what information this club holds about you

Under the Data Protection Legislation, you can ask to see any personal information that we hold about you. Such requests are called subject access requests. If you would like to make a subject access request, please contact the Club Secretary.

#### **Data retention**

Any data that we collect from you will be deleted in accordance with timescales set out above.

### **Changes to our Privacy Policy**

We regularly review our Privacy Policy and updates will appear on this page when necessary. This Privacy Policy was last updated in March 2020.

# FORM OF ACCEPTANCE AND CONSENT

This is to confirm that I have been provided with a copy of the Club's Data Protection and Privacy Policy which I have read and understand. I also understand that by becoming a member or renewing my annual subscription to Mullingar Sailing I thereby agree to accept and be bound by the terms of the Policy without condition or reservation as a condition precedent to my becoming/remaining a member of the Club.

| Signature of Member: <sub>.</sub> |  |
|-----------------------------------|--|
|                                   |  |
| Dated:                            |  |
| Witnessed by:                     |  |