



## **Data Protection Policy**

### **About this policy**

This policy explains when and why BSTC collect personal information about our members and how we use it; keep it secure and club member's rights in relation to it. This includes probationary members, visitors and guests. We will collect, use and store personal data, as described in this Data Protection Policy when people engage in activities at the club. Normally this will be through some level of membership.

We reserve the right to amend this Data Protection Policy from time to time without prior notice. You are advised to check our Club website regularly for any updates. We will only share your personal data with any third parties as outlined below.

We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)).

### **Responsible person**

For the purposes of the GDPR, The Club Membership Officer will be the "controller" of all personal data we hold about club members and others. The Membership Officer is responsible for making sure the club complies with the General Data Protection Regulation (GDPR) which applies from 25 May 2018. We will review personal data every year to establish whether we are still entitled to process it or not.

### **Member's rights**

You have rights under the GDPR:

- To access your personal data
- To be provided with information about how your personal data is processed
- To have your personal data corrected
- To have your personal data erased in **certain circumstances**
- To object to or restrict how your personal data is processed in **certain circumstances**

For more details, please address any questions, comments and requests regarding our data processing practices to the Membership Officer.

### **Specific use and sharing of personal information**

In general, your personal data will only be used for the purposes of membership management (renewals etc.) and your email and telephone numbers may be used for communication about news, competition entries/results and other important notices etc. Your name/address and email address may be shared with our current National Governing Body Triathlon Ireland. Your personal data will not be passed to anyone else outside the club and your email will only be given to someone outside the club with your permission.

### **The Lawful reasons for processing your data.**

We have two lawful reasons for processing your data, which are:



(a) Processing of your data is necessary for the administration of your membership contract.

(b) You have given consent to the processing of your data by signing our privacy statement for the specific purposes set out in this policy.

The tables below give further explanation of which lawful reason applies to which data, why we collect it and who we may be required to share it with. The club will make every effort to ensure data is only shared with organisations that are GDPR compliant.

**What Information we collect, why we collect it, and who we share it with**

In addition to the reasons stated below we may have to disclose your data where we have an inescapable legal obligation.

**Data processed as a requirement of managing your membership**

Type of information	Purpose	Shared with
Member's, probationary members and guests, address, telephone numbers, e-mail address	Managing the Member's membership of the Club and club insurance purposes.	Committee and associated working groups
Dates full and probationary membership commenced and ended.	Managing the Member's membership of the Club and club insurance purposes.	
Date of birth / age related information.	Managing membership categories which are age related.	
Gender.	Provision of adequate facilities for members.	
Disabilities	Provision of adequate facilities for members.	
Emergency contact details.	Contacting next of kin in the event of emergency.	Emergency services
First Aiders names	To provide a contact point in case of emergency	Members and probationary members
Qualifications	Coaching qualifications for quality assurance purposes	

Please note data processed for compliance with insurance purposes must be kept for 7 years from the end of your membership and is therefore exempt for your right to erasure under GDPR.



### **Data processed with your consent**

The club will seek consent in the application form before processing any information as outlined below.

<b>Type of information</b>	<b>Purpose</b>	<b>Shared with</b>
Member's, probationary members and guests, address, telephone numbers, e-mail address	Managing the Member's membership of the Club.	Triathlon Ireland / ITU / other National Governing Body
Date of birth / age related information.	Managing membership categories which are age related. Age related competition opportunities	
Gender.	Provision of adequate facilities for members. Gender related competition opportunities For the purposes of Reporting gender data.	
Disabilities	Provision of adequate facilities for members. Providing competitive and other opportunities.	
Competency	For accreditation and issue of competency cards	
Qualification	Coaching qualifications for quality assurance purposes	
Event time	For performance measures related to competition and selection. For media publicity of events	
Photos and videos of members	Putting on the Club's website and social media pages and using in press releases.	With permission of the members.
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing coaching, instruction and supervision of activities	Members, probationary members, other clubs and associations and NGBs
Member's name, address, telephone numbers, e-mail address	Website access and newsletter distribution	Web and newsletter publishers – members consent will be requested separate to membership/renewal



The club may be asked to share personal information we process about an individual and the name, address and email address with an appropriate National Governing Body (NGB). These include, but are not limited to, Triathlon Ireland and the ITU.

### **Enquiries and other communications with the club**

When enquiring about the club we may hold your details for a period of time to deal with the enquiry. Any emails and other communications with the club will only be retained for a period of time appropriate to the content or request. Club emails will be purged on a regular basis. People added to a club waiting list for membership will be informed and asked for permission to store that data at that point.

### **Children**

Parents or guardians signing the probationary or full membership form are giving their permission for the data to be used as described elsewhere in this policy.

### **How we protect your personal data**

The Data Controller will process membership information electronically and hold all information on a secure database on the BSTC Google Drive).

Coaches and instructors will also process and hold information pertaining to people under their instruction and necessary information will be made available to coaches and instructors only as required.

For any on-line payments which we take from members, probationers, visitors and guests we will use a recognised online secure payment system.

In the unlikely event of a breach of the security of data we will notify members promptly and we will never sell or pass on your personal data.

### **Request to see your personal information**

If you wish to know what personal data the club holds please email the Membership Officer and he/she will respond within 14 days of the request (depending on availability).

### **Accuracy and retention of data**

Each individual member is responsible for keeping the Membership Officer informed of changes to their data (e.g. address/telephone number etc. and this is updated at least once a year at renewal and you are at that time authorising the club to hold such data on file.

The data is kept on file on the BSTC Google drive. The data will be normally be kept for up to 7 years. It may be kept for a longer period for reasons of legal and civil action or other ongoing case management. Name, address and length of membership will be kept for up to 30 years for management of historical insurance claims. Names and event times may be kept indefinitely for reason of historical significance – e.g. on trophies, plaques and other awards.