

Introduction

Welcome to the Fitzwilliam Lawn Tennis Club (“the Club”) Data Protection Policy. Here you (the members and guests) can find all you need to understand about what the Club does with regard to data protection compliance. You can also find references to various other data protection-related documents and policies. This Policy will be updated from time to time to reflect changes in the law. You need to read this Policy.

The Club takes the protection of personal data very seriously. It is core to the way that we work as an organisation that we are transparent and lawful in the way we use personal data and, of course, is aligned with our purpose. With the implementation of the GDPR (‘EU General Data Protection Regulation’) in May 2018, and the world becoming ever more digitalised, the spotlight on data protection and the expectations on organisations to take steps to protect personal data have increased significantly and are expected to continue to do so.

If you have any queries about any of the information found in this Policy or in any related documents, please do not hesitate to contact the Financial Controller at admin@fltc.ie or phone 01-2815600.

1. The GDPR and our need to comply with it

The GDPR was established to provide a more up-to-date law for the protection of personal data as a result of the ever evolving digital economy and the way personal data is used in many aspects of life. It also looks at the security measures organisations have in place and strengthens the protections available for individuals in light of the value of personal data.

The correct and lawful treatment of personal data is critical to maintaining confidence in the Club and essential in providing a framework for successful operations. The Club aspires to implement best practice with regard to data protection.

2. Definitions

To assist you as a Member or Guest of our Club in understanding data protection and our obligations we have set out definitions below;

Term	Definition
Data Controller	A person who determines the purposes and means of the processing of personal data. A data controller is the individual or the legal person who controls and is responsible for the keeping and use of personal information.
Data Processor	A person who processes personal data on behalf of a data controller but does not include an employee of a data controller who processes such data in the course of employment. If an organisation or person holds or processes personal data, but does not exercise responsibility or control over the personal data, then they are deemed to be a "data processor".
Data Subject	A data subject is an individual who is the subject of personal data which is held by a data controller or processed by a data processor.
GDPR	The new EU General Data Protection Regulation (GDPR) - Regulation 2016/679 which comes into effect on the 25 th May 2018 and replaces the current Data Protection Directive 95/46/EC and the Irish Data Protection Act(s).
Personal Data	Data relating to an identified or identifiable natural person. Any piece of information, which can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context
Processing	Processing means performing any operation or set of operations on data, including: <ul style="list-style-type: none">• Obtaining, recording or keeping data;• Collecting, organising, storing, altering or adapting the data;• Retrieving, consulting or using the data;

Term	Definition
	<ul style="list-style-type: none"> • Disclosing the information or data by transmitting; • Disseminating or otherwise making it available; Aligning, combining, blocking, restricting, erasing or destroying the data.
Special Personal Data	<ul style="list-style-type: none"> • Data which concerns an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetics, biometrics, health, sex life or sexual orientation.

3. Core principles of the GDPR

Organisations must comply with the core principles of the GDPR which are:

- Personal data must be processed **lawfully, fairly and in a transparent manner**.
- Personal data must be collected only for **specified, explicit and legitimate purposes**.
- Personal data must be **adequate, relevant and limited** to what is necessary in relation to the purposes for which it is processed.
- Personal data must be **accurate** and where necessary **kept up to date**.
- Personal data must not be kept in a form which permits identification of individuals for longer than is necessary for the purposes for which the data is processed.
- Personal data must be processed in a manner that ensures its **security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage**.
- Personal data must not be transferred to another country without appropriate safeguards being in place.
- Personal data must be **made available to individuals** and individuals are allowed to exercise certain rights in relation to their personal data.

4. What type and Why Personal Data is collected by the Club:

Personal contact details collected by us includes name, title, addresses, telephone numbers and date of birth. We collect and process this data for registering you as a member of the club and to facilitate the use of the premises and facilities, for the performance of your contract and for management and administration purposes. Further details are provided in our Privacy Notice available at [insert link].

5. Legal Basis for processing:

To process your personal data we will rely most commonly on one or more of the following legal bases:

- To perform the contract we have entered into with you as a member or guest of the club.
- For our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

6. Sharing personal data with third parties (including suppliers)

Generally the Club is not allowed to share your personal data with third parties unless certain safeguards and contractual arrangements have been put in place.

We will only share your personal data with third parties, such as our service providers if:

- they have a need to know specific information for the purposes of providing the contracted services;

- the sharing complies with the Privacy Notice provided to the Data Subject and, if required the Data Subject's consent has been obtained;
- the third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place; and
- a fully executed written contract that contains GDPR approved third party clauses has been obtained.

Further details are provided in the Privacy Notice which is available on the Club website.

7. My personal data as a Member or Guest

The Club will process your personal data during the course of your application for membership and for the duration of your membership. As a guest we will process your data to ensure you can benefit from the facilities prior to and during your visit. We set out how we do this in our privacy notice, this helps us comply with our obligation to be transparent and gives you details on how you can exercise your rights as individuals in relation to your own personal data. You can find a copy of the applicable Privacy Notice [insert details].

8. Individual's Rights

You have certain rights under the Data Protection Legislation, (subject to some exemptions) where your Relevant Data is processed. These rights are to:

- a. Request access to your personal Data;
- b. Request the deletion of or correction of your personal Data;
- c. Object to the processing;
- d. Request that your personal Data be transferred to another person;
- e. Complain to the Data Protection Authority.
- f. Withdraw your consent to process the data (which will not affect the lawfulness of processing prior to that withdrawal).

If you wish to exercise these rights, please contact the data protection representative of the Club. All of these requests are handled by the Financial Controller admin@fltc.ie or phone 01-2815600.

9. Data security measures

The Club takes the security of your data very seriously and works to protect your data from loss, misuse and unauthorised access or disclosure. The Club has implemented security measure to ensure this and all staff and officers who handle personal data are aware of this policy and have been given training in how to correctly collect, process, store and delete data.

10. How long should the Club hold personal data for?

As part of our review process we have identified the different types of personal data processed by the Club. In broad terms the Club retains data:

- For as long as there is a reasonable and legally justifiable business need, such as managing our relationships with members and guests;
- For as long as we provide or receive services and for as long as someone could bring a legal or regulatory claim against us or investigation relating to our affairs; and
- In line with the applicable legal and regulatory retention periods that are prescribed for each category/data type.

Thereafter the Club will delete data in the following ways;

- paper – shredding
- Electronic – as per the Club's email deletion policy
- CCTV – backups overwritten after 14 days

11. Responsibilities of Members who process Data

If as a member of the Club you are requested to process personal data in your role as an Officer or as part of a team you have a responsibility to comply with this data protection policy and ensure compliance with the principles of data protection. You should;

- Read and understand the data protection policies, procedures and guidelines drawn up by the Club.
- Ensure that all data you access, manage and control as part of your duties is processed in accordance with data protection requirements.
- Return all personal data relating to Club members or guests upon termination of your role.

12. Data Breaches

All data breaches will be reported to the Data Protection Authority within 72 hours, unless the data was anonymised or encrypted or if it has a particularly high risk.

13. Data Protection Authority

The Irish Data Protection Commissioner is the Club's supervisory authority in the European Union. Any complaints should be made to the Data Protection Commissioner however we do recognise that other supervisory authorities may be involved we undertake to liaise with them also when required.