



## Data Protection Policy

### Who are we?

Swords Sailing and Boating Club 'SSBC' is situated on Broadmeadows Estuary, Malahide, Co Dublin. It is a club run by volunteers 'the Committee' for the benefit of its members. This SSBC Committee is elected annually and contains the Flag Officers and General Committee members of SSBC.

This Committee has an obligation to perform their duties for the proper management and governance of the Club for the benefit of the members and to comply with the Rules of the Governing Bodies and other authorities. To fulfil this role, the SSBC Committee will collect and use personal data.

The Committee has overall responsibility for ensuring compliance with the Data Protection legislation when handling this personal data. All Officers or other designated persons of the Club who collect and/or control the contents and use of personal data are also responsible for compliance with the Data Protection legislation.

### About this Policy

This policy explains when and why SSBC collects personal information about its members and instructors, how we use it, how we keep it secure and club member's rights in relation to it.

We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

We will always comply with Data Protection Legislation and 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 Data Protection Commissioner [www.dataprotection.ie](http://www.dataprotection.ie)

For the purposes of the GDPR, SSBC Committee will be the "controller" of all personal data we hold about you.

### Principles of Data Protection

#### There are 8 fundamental principles when processing personal data

1. Personal data shall be processed fairly and lawfully
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. 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.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

## Collection of Data

All Data collected by SSBC will be processed fairly and in keeping with the purposes for which it was obtained. Data will be kept only for clear, legal and legitimate purposes.

### Schedule 1

#### Information we collect and why.

| Type of information                                       | Purpose/Use   | Legal Basis  |
|---|---|--|
| Member's name, address, telephone numbers, e-mail address | Managing the Member's membership of the Club.<br><br>Managing the Pen facilities and allocation of space.<br><br>Managing the duty roster.<br><br>Managing club events.<br><br>Training registers.<br><br>Register as a volunteer.<br><br>Merchandise Purchase.<br><br>Communication about club matters eg by newsletter or text. | For the purposes of our legitimate interest in operating the club.   |
| Member's name, telephone numbers, e-mail address          | Sharing with other club members to facilitate duty roster swaps, training, volunteer duties.  | The club will seek consent in the renewal/application form before sharing members contact information with other club members.<br><br>Members may withdraw this consent at any time by contacting us by e-mail or letter. <a href="mailto:info@swordssailing.ie">info@swordssailing.ie</a> |
| The names and ages of the Member's dependants.            | Managing the Member's and their dependants' membership of the Club.   | Provision of sufficient and suitable facilities.<br><br>For the purposes of our legitimate interest in operating the club.   |
| Emergency contact details.                                | Contacting next of kin in the event of emergency.   | Protecting the members vital interests and those of their dependants.  |
| Date of birth / age related information.                  | Managing membership categories which are age related.   | For the purposes of our legitimate interest in operating the club.   |

|   |  |  |
|---|--|--|
| Gender.   | Provision of adequate facilities for members.  | Provision of sufficient and suitable facilities.<br><br>For the purposes of our legitimate interest in operating the club.   |
| The Member's name, boat name and sail number  | Managing/Publishing race entries and race results.<br><br>Managing/Publishing archived race entries and race results.<br><br>Managing/Publishing the club duty roster.<br><br>Supplying race results to local and national media.<br><br>The management and allocation of pen spaces within the club compound. | For the purposes of our legitimate interests in holding races for the benefit of members of the Club.<br><br>For the purposes of our legitimate interests in promoting the Club.<br><br>For the purposes of our legitimate interests in operating the Club.<br><br>For the purposes of our legitimate interest in archival of historical research. |
| Members Names, Photos of members, videos of members and their boats                                       | Publishing on the Club's website, social media pages, notice board within clubhouse and press releases.  | The club will seek consent in the application /membership form to publishing same.<br><br>Members may withdraw this consent at any time by contacting us by e-mail or letter. <a href="mailto:info@swordssailing.ie">info@swordssailing.ie</a>   |
| Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience. | Managing instructors and parents or guardians at the club. So that we can contact those offering instruction and provide details of instructors to members.  | For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members.   |

## Schedule 2

### How is the information stored and who has access to it?

| Format  | Location Held | Format      | Who has access to it                           | Third Party Access |
|---|---------------|-------------|--|--------------------|
| Membership Application and Renewal Forms      | Club house    | Paper files | Treasurer, Hon Secretary, Sailing Secretary    | NO                 |
| Membership Application and Renewal Forms data | Google Drive  | Electronic  | Treasurer and Hon Secretary -Read/Write access | NO                 |

|                   |            |             |  |    |
|-------------------|------------|-------------|--|----|
|                   |            |             | All other members of the committee -Read access only |    |
| Event Entry Forms | Club house | Paper files | Treasurer and Sailing Secretary                      | NO |

### How we protect your personal data

We have implemented generally accepted standards of technology and operational security in order to protect personal data.

We will not transfer your personal data outside the EU without your consent.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

### How we share your personal data

Data will not be used, disclosed or processed in any manner incompatible with the purposes for which it was obtained.

Save as required by law or in the case of an emergency (e.g. criminal investigations, accidents) no disclosure of Data will be made to third parties' without members consent.

Under no circumstances will lists of member data/information (i.e. mailing lists or database information) be disclosed to third parties

### Retention of information

We will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as it is in the Clubs' legitimate interest to do so or for as long as is necessary to comply with our legal obligations.

We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form for legitimate interest.

We securely destroy all financial information once we have used it and no longer need it.

## **Your 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
- to have your personal data transferred to yourself or to another business in certain circumstances.

You can exercise these right at any time by contacting us at by e-mail at [info@swordssailing.ie](mailto:info@swordssailing.ie)  
We will respond within a reasonable period but not more than one month.

You also have the right to take any complaints about how we process your personal data to the Data Protection Commissioner 'DPC';

### **DPC Dublin Office Address**

**21 Fitzwilliam Square**

**Dublin 2**

**Ireland**

## **Cookies**

The SSBC websites use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to make improvements.

For detailed information on the cookies we use on our websites and the purposes for which we use them, please refer to the clubs cookie policy.

## **Changes to this policy**

Any changes we may make to our privacy policy in the future will be posted on the SSBC website. Please check back frequently to see any updates or changes to our privacy policy.

## **Contact details**

Questions, comments and requests regarding this privacy policy are welcomed and should be sent by email to [info@swordssailing.ie](mailto:info@swordssailing.ie)