

# Canoeing Ireland GDPR Privacy Policy Introduction

The Irish Canoe Union (T/A Canoeing Ireland) CI and its subsidiaries for the purposes of data protection legislation is the data controller. The company registration is 118443 and our address is Sport HQ, National Sports Campus, Blanchardstown, Dublin 15.

Canoeing Ireland is the owner of <a href="www.canoe.ie">www.canoe.ie</a> and we are committed to protecting your privacy and processing your personal data in accordance with the Data Protection Act (DPA) 1998 up to 24 May 2018 and the General Data Protection Regulation (GDPR) on and from 25 May 2018 (Data Protection Legislation). This policy explains how any information we collect about you is used and kept securely.

This policy applies to you if you are either:

- 1. An individual participant paddlesport who has registered as a member of our organisation and/or whose details we have collected from you directly or from one of our affiliated clubs, schools, universities, or other third-party referrals.
- 2. An individual participant in one of our events/programmes who is not a member of our organisation but whose details we have collected from you directly.
- 3. An instructor, coach, technical official, teacher, team manager, committee member, volunteer who has registered for membership.
- 4. A customer, fan, participant, or supporter of Canoeing Ireland who has contacted us to purchase any of our online merchandise, signed up for any of our training courses and/or qualification programmes and/or signed up to receive updates about upcoming events, offers and ways to get involved further with Canoeing Ireland.

We are committed to respecting your privacy. This policy document explains how we may use personal information we collect before, during and after you participate with us and how we comply with the law on data protection, what your rights are for the purposes of data protection. In some/most instances we will be the data controller but in others we may be the data processor of your personal information.

It also explains your privacy choices when using our website as well as your right to access your information under Data Protection Legislation.

Our privacy policy relates only to information that we obtain from you. If you visit a website operated by a third party through a link included on this Website, your information might be used differently by the operator of the linked website.

This privacy policy outlines how Canoeing Ireland upholds the following data protection principles:

- 1. Obtain and process information fairly.
- 2. Keep it only for one or more specified, explicit, and lawful purposes.
- 3. Use and disclose it only in ways compatible with these purposes.
- 4. Keep it safe and secure.
- 5. Keep it accurate, complete, and up to date.
- 6. Ensure that it is adequate, relevant, and not excessive.
- 7. Retain it for no longer than is necessary for the purpose or purposes.
- 8. Give a copy of his/her personal data to than individual, on request.



# The information we may collect about you.

When you sign up for membership with us or for your child, or as a volunteer with us, or as a customer/participant for one of our programmes, you may provide us with or we may obtain personal information about you or your child, such as information regarding your or your child.

- 1. Personal contact details that allow us to contact you directly such as name, title, email addresses, home address and telephone numbers; Date of birth; Gender.
- 2. Details of family members and emergency contacts.
- 3. Membership details including start and end date.
- 4. All information included as part of the volunteering application or education process.
- 5. Any identification documents.
- 6. Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us.
- 7. Records of your volunteering history.
- 8. Performance including any feedback provided to us by yourself, members of staff or other third parties.
- 9. Referee details and any references provided.
- 10. Any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you.
- 11. Use of and movements through our online portal, passwords, personal identification numbers, IP addresses, usernames and other IT system identifying information.
- 12. Records of your attendance at any activities, events and/or competitions hosted by us or our affiliated clubs or recognised programme providers.
- 13. Images at events and/or competitions in video and/or photographic form and voice recordings.
- 14. Your marketing preferences so that we know whether and how we should contact you.

# Athletes/Participants

If you are a participant who has registered his/her interest in participating in the sport competitively, you may also provide us with, or we may obtain the following additional personal information from you:

- Identification documents such as passport and identity cards.
- Details of any club membership and school/university being attended.
- Details of next of kin, family members, coaches, and emergency contacts.
- Records and assessment of any athlete rankings, gradings or ratings, competition results, details regarding events attended and performance.
- Any disciplinary and grievance information.
- Any details required for the purposes of awarding scholarship funding or grants.

#### Coaches/Teachers, Officials/Team Managers, Customers, Participants

If you have registered with/involved with us/partaking in our coaching/Instructing accreditation/qualification scheme and/or any of our education and teaching programmes you may also provide us with, or we may obtain the following additional personal information from you: Your current affiliated club or other organisation (if applicable).

Coaching/teaching/Instructing qualification and/or officiating history (if any).

- Accreditation/qualification start and end date.
- Identification documents such as passport, utility bills, identity cards, etc.



#### Special Categories of personal information

We may also collect, store, and use the following "special categories" of more sensitive personal information regarding you:

Information about your race or ethnicity, religious beliefs, and sexual orientation.

Information about your health, including any medical condition, health and sickness records, medical records, and health professional information.

Information about your criminal history, if any.

We may not collect all the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that:

- The processing is necessary for reasons of substantial public interest, on a lawful basis.
- It is necessary for the establishment, exercise, or defence of legal claims.
- It is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law, OR
- Based on your explicit consent.

Members/Volunteers/Customers/Participants 3 of 10 In the table below, we refer to these as the "special category reasons for processing of your personal data". We may also collect criminal records information from you. For criminal records history, we process it based on legal obligations or based on your explicit consent.

# Where we collect your information

We typically collect personal information about our members/volunteers/customers/participants when you become a member/volunteer/customer/participant of Canoeing Ireland or engage with us to purchase/avail of any services or products we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you from any club, school, or other organisation you are affiliated with or from other referrals such as from coaches.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it.

#### How we use your information

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

All Members/Volunteers/Customers/Participants			
Purpose	Personal information used	Lawful basis	
To comply with health and safety requirements	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport	
Deciding about your appointment as a volunteer and managing the appointment process	All the personal information we collect from you as part of the application process. Records of volunteering history. Referee details and any references. relationship with us as a volunteer.	We need this information to be able to perform and administer your relationship with us as a volunteer.	



Paying you for any out-of-pocket expenses	Transaction and payment information	Where you have given us your consent to do so.
Dealing with legal disputes involving you, or any other volunteers, including accidents	All non- 'special categories' of personal information.	We also have a legal obligation to report any accidents at a workplace in accordance with health and safety legislation.
To prevent and detect criminal or improper acts	Identification documents.	We may have a legal obligation to do so; otherwise, we have a legitimate business interest to protect our organisation against criminal or improper acts.
Storage of records relating to you and records relating to our organisation	All non- 'special categories' of personal information.	We need this information to be able to fulfil our obligations to you.
To administer and process your event entry.	Personal details, health, and emergency contact details. To allow us to process your entry and safely manage the running of the event.	Legitimate Interest to ensure we can process your entry and manage an event safety and effectively.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your attendance at any activities, events or competitions hosted by us or through our programmes delivered by Canoeing Ireland affiliated clubs, our Training Centre and recognised programme providers.	We have a legitimate interest in doing so to ensure that we can monitor participation trends and monitor the success of our event-based programmes
To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about Membership, events, participation products and information about our commercial partners	All contact and membership details and marketing preference	Where you have given us your explicit consent to do so
To answer your queries or complaints	Contact details and records of your interactions with us.	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership/relationship with us
To administer any membership account/s you have with us and managing our relationship with you, (including arranging for any insurance) and dealing with payments and any support, service or product enquiries made by you properly manage and administer your membership contract with us.	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
To publish event results	Your name, age category and event result published on the Canoeing Ireland website.	Where you have given us your explicit consent to do so
Retention of records	Personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records to



		properly administer and manage your membership/relationship in some cases, we may have legal or regulatory obligations to retain records. We process special category personal data based on the "special category reasons for processing of your personal data" For criminal records history we process it based on legal obligations or based on your explicit consent.
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure
For the purposes of promoting the sport, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.
	Competitive/Performance Athlet	
Purpose	Personal information used	Lawful basis
To conduct performance reviews, manage performance and determine performance requirements and administer your development and training requirements on any player pathway programme	All performance and attendance data and information about your health and medical condition. Details of any affiliated club membership	This is necessary to enable us to properly manage and administer your development through the performance programme.
To make decisions about your progression and development through any performance pathway programme and to assist with the delivery of rankings and ratings	All performance and attendance data and information about your health. Details of any affiliated club membership.	This is necessary to enable us to properly manage and administer your development through the performance programme.
To administer and monitor your attendance at events and competitions	All non-medical performance and attendance data.	This is necessary to enable us to register you on to and properly manage and administer your development through the performance programme.
To arrange for any trip or transportation to and from an event	Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health, and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event.
To administer any drug and alcohol testing	Health and medical	Health and medical information We process special category personal data based on the "special category reasons for processing of your personal data"
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate, to provide appropriate adjustments to our sports facilities and to	Health and medical information.	We process special category personal data based on the "special category reasons for processing of your personal data".



monitor and manage sickness absence		
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect including any disciplinary and grievance information.	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications. For criminal records history we process it based on legal obligations or based on your explicit consent.

For some of your personal information we will have a legal, contractual, or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information, we may not be able to administer your event entry and/or be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as at <a href="mailto:info@canoe.ie">info@canoe.ie</a> Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent.

#### Cookies

Information may be sent to your computer in the form of an Internet "cookie" to allow the CI servers to monitor your requirements. The cookie is stored on your computer. The CI server may request that your computer return a cookie to it. These return cookies do not contain any information supplied by you or any personally identifiable information about you. Such measures are necessary to allow the CI to measure the usability of the systems, which will help to continually improve user experience of our websites. Your browser software should however enable you to block cookies if you wish to. For more information about cookies, please visit <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a>

## Protecting your information

By submitting your personal data, you agree to this transfer, 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. We use up-to-date industry procedures to protect your personal information.

#### Sharing your information

We share personal information with the following parties:

Any party approved by you.

To our staff, coaches, officials, managers: to allow them to properly administer the sports on a local, regional, and national level.



Service providers: for example, email marketing specialists, payment processors, data analysis, promotional advisors, contractors or suppliers and IT services (including CRM, website, video, and teleconference services).

Our Commercial/Event Partners: for the purposes of providing, you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners relevant to the events you have participated where you have given your express consent for us to do so.

The Government or our regulators (for example: Sport Ireland, Sport Ireland Coaching, Institute of Sport, Sport NI Institute) or where we are required to do so by law or for the purposes of funding requirements or/and to avail of their services; or/and to assist with their investigations or initiatives.

Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above.

# Transferring your personal information internationally

The personal information we collect may be transferred to and stored in countries outside of Ireland and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this Privacy Notice and applicable data protection laws and is respected and kept secure and where a third part processes your data on our behalf, we will put in place appropriate safeguards as required under data protection laws.

# Finding out what information CI 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 Canoeing Ireland's Data Protection Officer. Email: <a href="mailto:info@canoe.ie">info@canoe.ie</a> You will also need to provide two forms of identification, for example, driving licence, utility bill or passport and, if appropriate, any particulars about the source or location of the information you are requesting. Canoeing Ireland has 30 days to respond to your subject access request.

#### Data retention

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period of six years after your last contact with us. Exceptions to this rule are:

Information that may be relevant to personal injury claims or discrimination claims may be
retained until the limitation period for those types of claims has expired. For personal injury
or discrimination claims this can be an extended period as the limitation period might not
start to run until a long time after you have been involved with us.



It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. If you are a member of Canoeing Ireland, then you can update your personal information that we hold about you through our Membership Database.

#### Your rights in relation to personal information

- You have the following rights in relation to your personal information:
- The right to be informed about how your personal information is being used.
- The right to access the personal information we hold about you.
- The right to request the correction of inaccurate personal information we hold about you.
- The right to request the erasure of your personal information in certain limited circumstances.
- The right to restrict processing of your personal information where certain requirements are met, The right to object to the processing of your personal information.
- The right to request that we transfer elements of your data either to you or another service provider.
- The right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights. Whilst this Privacy Notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Data Protection Commissioner's (DPC) website at

https://www.dataprotection.ie/docs/GDPR/1623.htm or if you are based in Northern Ireland at https://ico.org.uk/for-the-public/

If you are unhappy with the way we are using your personal information, you can also complain to the Data Protection Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

## 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 June 2020.