

Bangor RF&CC Privacy Policy

INTRODUCTION

Bangor RF&CC is a data controller in respect of personal information that we process under the new General Data Protection Regulation (GDPR) in connection with our business as a Community Amateur Sports Club. GDPR gives you more control over how your personal information is used and makes it easier for you to check and update the information we, and other organisations we work with, hold about you. Bangor RF&CC is committed to protecting your privacy and security and will continue to collect, use, store and share your data safely and securely.

This policy describes how Bangor RF&CC (also referred to as 'the Club', 'we' or 'us' or 'our') will make use of the data we handle in relation to our members and players, including our use of the IRFU Clubhouse GMS. It also covers how we will make use of the data we handle in relation to our employees and non-member volunteers.

It also describes your data protection rights, including a right to object to some of the processing which we carry out. For more information about your rights, and how to exercise them, please refer to **Section 5 'Your rights'**.

Our address is Upritchard Park, Bloomfield Road South, Bangor BT19 7RN and our contact details can be located at <http://www.pitchero.com/clubs/bangorrfc/> and <http://bangorcricquetclub.com/>.

1. (a) What information we collect from you

We collect and process personal data from you or your parent when you join the Club and when we carry out annual renewals of your membership. This includes, where relevant:

- your name, gender and date of birth;
- your IRFU ID as assigned in the IRFU Clubhouse General Management System (GMS) Player Registration database;
- your NCU URN as assigned by the NCU Player Registration database;
- your (or in the case of age-grade players, your parent's or guardian's) home address, email address and phone number;
- your medical conditions or disability, where you provide this to us with your consent (or your parent's consent) so that we are aware of any support you may need from us.
- your type of membership and involvement in particular teams, or any key role you may have, such as Chair, Club Welfare Officer (rugby), Child Welfare Officer (cricket), Membership Secretary etc.;
- your payment and/or bank account details, where you provide these to pay for membership;
- your marketing preferences, including any consents you have given us;

and, in the case of potential employees,

- your passport and NI details, where we have to check your eligibility or ability to work for us;

Some information will be generated as part of your involvement with us, in particular data about your involvement in particular matches in match reports and details of any disciplinary issues or incidents you may be involved in on and off the pitch, such as within health and safety records.

1. (b) What information we receive from third parties

Sometimes, we receive information about you from third parties. For example, if you are a child, we may be given information about you by your parents.

We may receive information relating to your existing registrations with other rugby or cricket clubs or governing bodies, or disciplinary history from the IRFU through the Clubhouse GMS, or the NCU/CI player registration system.

For certain role holders or those working with age-grade players, we may receive information from Access NI and the IRFU or NCU/CI on the status of any Access NI check you have been required to take.

2. (a) How we use this information, and the legal basis for this use

We process this personal data for the following purposes:

- To fulfil a contract, or take steps linked to a contract: this is relevant where you make a payment for your membership and any merchandise or enter a competition. This includes:
 - *taking payments;*
 - *communicating with you;*
 - *providing and arranging delivery or other provision of products, prizes or services;*
- As needed by us to conduct our business and pursue our legitimate interests, in particular:
 - *to manage and administer your membership and your involvement with our teams, our social activities, and to keep in contact with you for these purposes;*
 - *to maintain records of our performances and history, including match reports, scores and team sheets;*
 - *sharing anonymised data with a funding partner as a condition of grant funding;*
 - *we use CCTV cameras to maintain the security of our premises, and may use this video to investigate incidents at the Club or its premises;*
 - *we may choose to send you promotional materials and offers by post or by phone, or by email where we want to send you offers relating to similar products and services that you have already bought;*
 - *we use data of some individuals to invite them to take part in market research;*
- Where you give us consent:
 - *we will send you direct marketing or promotional material by email;*
 - *we may handle medical or disability information you or your parent provides to us, to ensure we support you appropriately;*
 - *on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.*
- For purposes which are required by law:
 - *we maintain records such as health and safety records and accounting records in order to meet specific legal requirements;*
 - *we ensure, where you will work with age-grade players, that you have undergone an appropriate Access NI check – this is also carried out with your consent.*
 - *where you hold a role at the Club requiring us to check your right to work, we may process information to meet our statutory duties;*
 - *we keep an alphabetical list of the names and addresses of every official and member of the Club on the Club premises to comply with the Registration of Clubs (NI) Order 1997.*

- *we may respond to requests by government or law enforcement authorities conducting an investigation.*

2. (b) How the IRFU uses any of my information (Rugby Section members of the Club)

The IRFU provides the Clubhouse GMS, but makes its own use of the following information:

- *your name, gender and date of birth;*
- *your IRFU Player Registration ID (as assigned in IRFU Clubhouse GMS);*
- *your home address, email address and phone number; and*
- *your type of membership and involvement in particular teams at the Club, or any key role you may have been allocated, such as Chairperson, Honorary Secretary, Fixtures Secretary, Club Welfare Officer (Rugby) and Child Welfare Officer (Cricket), etc.*

The IRFU uses this information as follows:

- As required by the IRFU to conduct its business and pursue its legitimate interests, in particular:
 - *communicating with you or about you where necessary to administer Rugby in Ireland, including responding to any questions you send to the IRFU about the IRFU Clubhouse GMS;*
 - *administering and ensuring the eligibility of players, match officials and others involved in Irish rugby – this may involve the receipt of limited amounts of sensitive data in relation to disabled players, where they are registered for a disabled league or team, or in relation to anti-doping matters;*
 - *maintaining records of the game as played in Ireland, in particular maintaining details of discipline and misconduct;*
 - *monitoring use of IRFU Clubhouse GMS, and using this to help it monitor, improve and protect its content and services and investigate any complaints received from you or from others about Clubhouse GMS;*
 - *maintaining stats and conducting analysis on rugby participants playing categories and coaches qualifications;*
 - *ensuring compliance with the current IRFU Rules and Regulations including those on the affiliation of clubs, referee societies, constituent bodies and other rugby bodies, and registration of players; and*
 - *communicating with you to ask for your opinion on IRFU initiatives.*
- For purposes which are required by law:
 - *The IRFU will ensure, where you will work with age-grade players and where this is required, that you have undergone an appropriate Access NI check – this is also carried out with your consent.*
 - *The IRFU may respond to requests by government or law enforcement authorities conducting an investigation.*

2. (c) How the NCU/CI uses any of my information (Cricket Section members of the Club)

The NCU/CI uses this information for the same purposes as specified for the IRFU as above:

3. Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or any profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below in **Section 6 'How you get in touch with us or the IRFU or NCU/CI'**.

4. Who we share this data with, where and when

In addition to sharing data with the IRFU and NCU/CI as appropriate, we will share your data with our club website hosts for communication, publicity and marketing purposes.

Some limited information may be shared with other stakeholders in rugby and/or cricket, such as other clubs, Constituent Bodies, referee/umpire societies, league organisers, so that they can maintain appropriate records and assist us in organising matches and administering the sports.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our or the IRFU's or CI/NCU's legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on our behalf for the purposes identified above. Such third parties include the IRFU as the provider of Clubhouse GMS, our UK based website hosts and our UK based direct debit membership subscription collection company.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by (a) EU Commission approved standard contractual clauses, (b) an appropriate Privacy Shield certification or (c) a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review on request.

5. Your rights

You have the right to **ask us for a copy** of your personal data; to **correct, delete or restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format**.

In addition, you can **object to the processing** of your personal data in some circumstances, in particular where we don't have to process the data to meet a contractual or other legal requirement or where we are using the data for direct marketing.

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

You have the same rights for data held by the IRFU for its own purposes on IRFU Clubhouse GMS or by the NCU/CI for its own purposes on their databases.

To exercise any of these rights, you can get in touch with us - or, as appropriate, the IRFU and/or NCU/CI and their respective Data Protection Officers - using the details set out in **Section 6** below.

If you have unresolved concerns, you have the **right to complain** to the Information Commissioner's Office – Northern Ireland, 3rd Floor, 14 Cromac Place, Belfast BT7 2JB.

Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by IRFU and/or NCU Rules and Regulations and Registration of Clubs (NI) Order 1996 as appropriate. We will inform you which information is mandatory when it is collected. Some information is optional, particularly information such as your medical information. If this is not provided, we may not be able to provide you with appropriate assistance, services or support.

6. How you get in touch with us or the IRFU or NCU/CI

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or if you would like to opt out of direct marketing, you can get in touch at bangorrfc@gmail.com or by writing to the Data Protection Officer, Bangor RF&CC, Bloomfield Road South, Bangor BT19 7RN. We will process your request accordingly in line with the steps outlined in the Club's 'Subject Access Request Flow Chart'.

If you have any concerns about how the IRFU processes your data, you can get in touch at info@IrishRugby.ie or by writing to the Data Protection Officer, IRFU, 10-12 Lansdowne Road, Dublin 4.

If you have any concerns about how the NCU or CI processes your data, you can get in touch as appropriate at info@cricketireland.ie; or by writing to the Data Protection Officer, NCU, The Pavilion, Stormont Estate, Upper Newtownards Road, Belfast, BT4 3TA or the Data Protection Officer, CI, Unit 22, Grattan Business Park, Clonsaugh, Dublin 17.

7. How long we retain your data for

We process the majority of your data **for as long as you are a member of the Club and for 1 year after this.**

Where we process personal data for marketing purposes or with your consent, we process the data **for as long as you are a member of the Club**, unless you ask us to stop, when we will only process the data for a short period after this to allow us to implement your requests. We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract or for a competition, we keep the data for **6 years from your last interaction with us.**

We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

The IRFU will maintain records of individuals who have registered on the IRFU Clubhouse GMS, records of Access NI checks and the resulting outcomes and other disciplinary matters for such period as is set out in the IRFU's privacy notice on <http://www.irishrugby.ie/legal.php>.

Records of your involvement in a particular match, on team sheets, on results pages or in match reports may be held indefinitely both by us and the IRFU in order to retain historical records of the sport.

The NCU will maintain records of individuals who are registered players, coaches or administrators in a similar vein to that used by the IRFU.

8. Security

We are committed to ensuring that your information is secure with us and with third parties who act on our behalf by following strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage. Paper versions of the data that you provide us are securely locked in a filing cabinet with access strictly limited to registered data holders within the Club on a strictly 'need to know' basis. The data you provide which is used by us for third parties is protected using password protected systems, with access permitted only on a strictly 'need to know' basis. We require all third parties to have appropriate technical and operational security measures using industry standard SSL technology to protect your personal data, in line with UK, Irish and EU law on data protection rules.

Where breaches of security occur, we will implement and follow through the procedures outlined on the Club's Data Breach Management Flow Chart to assess, and where appropriate, inform members affected by a breach, record the incident and mitigate the risk.

9. A summary of how we, the IRFU and NCU/CI use your data

- Bangor RF&CC uses your personal data to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes.
- Some data is shared with the IRFU and/or NCU/CI, as appropriate to each playing section of the Club, who use your data to regulate, develop and manage the game.
- Data is also shared with some governmental authorities and the PSNI with regard to Registration of Clubs, affiliation processes and applications for funding where anonymised data is shared with a funding partner as condition of grant funding e.g. Local Authority and where personal details of key officers of the Club may be required.
- Where we or the IRFU or NCU/CI rely on your consent, such as any consent we seek for email marketing, you can withdraw this consent at any time.
- Amongst the data we collect from you may be medical (including injury) information. We will hold this where you (or your parent) has given consent, so that we can ensure we are aware of your condition and that you are supported appropriately.
- Where you work in a particular role within rugby and/or cricket, you may be required to undergo an Access NI using the IRFU's and/or the NCU/CI's system via the Club's CWO's for rugby and cricket respectively. The result of this check will be input into the IRFU Clubhouse Game Management Service (GMS) record and/or the equivalent NCU/CI database as appropriate.

The specific detail of this Policy is subject to amendment and approval by Bangor RF&CC Management Committee.

Norman Gault (Hon Secretary Bangor RF&CC)

John McMaster (Chairman, Bangor RF&CC)

Dated: 22nd May 2018