

Arklow Tennis Club Policy and Procedures

Data Protection/GDPR Policy

April 2023

Document History

Date	Description	Approved by	Version
16/04/2023	Document created	ALTC Committee	1.0

Document Scope and Purpose

The policy covers both personal and sensitive personal data held in relation to data subjects by Arklow Lawn Tennis Club. The policy applies equally to personal data held in manual and automated form. All Personal and Sensitive Personal Data will be treated with equal care by Arklow Lawn Tennis Club. Both categories will be equally referred-to as Personal Data in this policy, unless specifically stated otherwise.

The purpose of this document is to provide a concise policy statement regarding the Data Protection obligations of Arklow Lawn Tennis Club. This includes obligations in dealing with personal data, in order to ensure that the organisation complies with the requirements of the relevant Irish legislation, namely the Irish Data Protection Act (1988), and the Irish Data Protection (Amendment) Act (2003) and General Data Protection Directive 2016.

Rationale

Arklow Lawn Tennis Club must comply with the Data Protection principles set out in the relevant legislation. This Policy applies to all Personal Data collected, processed and stored by Arklow Lawn Tennis Club in relation to its staff, service providers and members in the course of its activities. Arklow Lawn Tennis Club makes no distinction between the rights of Data Subjects who are employees, and those who are not. All are treated equally under this Policy.

Arklow Lawn Tennis Club as a Data Controller

In the course of its daily organisational activities, Arklow Lawn Tennis Club acquires, processes and stores personal data in relation to:

- Employees/Contractors of Arklow Lawn Tennis Club
- Members of Arklow Lawn Tennis Club
- Committee Members of Arklow Lawn Tennis Club
- Volunteers of Arklow Lawn Tennis Club
- Third party service providers engaged by Arklow Lawn Tennis Club

In accordance with the Irish Data Protection legislation, this data must be acquired and managed fairly. Not all staff, volunteers and committee members will be expected to be experts in Data Protection legislation. However, Arklow Lawn Tennis Club is committed to ensuring that these personnel have sufficient awareness of the legislation in order to be able to anticipate and identify a Data Protection issue, should one arise. In such circumstances, personnel must ensure that the Committee is informed in order that appropriate corrective action is taken. Due to the nature of the services provided by Arklow Lawn Tennis Club, there is regular and active exchange of personal data between Arklow Lawn Tennis Club and its Data Subjects. In addition, Arklow Lawn Tennis Club exchanges personal data with Data

Processors on the Data Subjects' behalf. This is consistent with Arklow Lawn Tennis Club's obligations under the terms of its contract with its Data Processors. This policy provides the guidelines for this exchange of information, as well as the procedure to follow in the event that a Arklow Lawn Tennis Club member, committee member or volunteer is unsure whether such data can be disclosed. In general terms, the person involved should consult with the Committee to seek clarification.

Subject Access Requests

Any formal, written request by a Data Subject for a copy of their personal data (a Subject Access Request) will be referred, as soon as possible, to the Committee, and will be processed as soon as possible. It is intended that by complying with these guidelines, Arklow Lawn Tennis Club will adhere to best practice regarding the applicable Data Protection legislation.

Third-Party processors

In the course of its role as Data Controller, Arklow Lawn Tennis Club engages a number of Data Processors to process Personal Data on its behalf. In each case, a formal, written contract is in place with the Processor, outlining their obligations in relation to the Personal Data, the specific purpose or purposes for which they are engaged, and the understanding that they will process the data in compliance with the Irish Data Protection legislation. These Data Processors include but are not limited to:

- Website maintenance company
- Bank of Ireland for payment processing
- Any governing body
- Other tennis clubs

Data Protection Principles

The following key principles are enshrined in the Irish legislation and are fundamental to the Arklow Lawn Tennis Club's Data Protection policy. In its capacity as Data Controller, Arklow Lawn Tennis Club ensures that all data shall:

1. ... be obtained and processed fairly and lawfully. For data to be obtained fairly, the data subject will, at the time the data are being collected, be made aware of:
 - The identity of the Data Controller (Arklow Lawn Tennis Club)
 - The purpose(s) for which the data is being collected
 - The person(s) to whom the data may be disclosed by the Data Controller
 - Any other information that is necessary so that the processing may be fair. Arklow Lawn Tennis Club will meet this obligation in the following way.
 - Where possible, the informed consent of the Data Subject will be sought before their data is processed;
 - Where it is not possible to seek consent, Arklow Lawn Tennis Club will ensure that collection of the data is justified under one of the other lawful processing conditions – legal obligation, contractual necessity, etc.;
 - Processing of the personal data will be carried out only as part of Arklow Lawn Tennis Club's lawful activities, and Arklow Lawn Tennis Club will safeguard the rights and freedoms of the Data Subject;

- The Data Subject's data will not be disclosed to a third party other than to a party contracted to Arklow Lawn Tennis Club and operating on its behalf. This will be with the full knowledge and consent of the Data Subject.
2. be obtained only for one or more specified, legitimate purposes. Arklow Lawn Tennis Club will obtain data for purposes which are specific, lawful and clearly stated. A Data Subject will have the right to question the purpose(s) for which Arklow Lawn Tennis Club holds their data, and Arklow Lawn Tennis Club will be able to clearly state that purpose or purposes.
 3. not be further processed in a manner incompatible with the specified purpose(s). Any use of the data by Arklow Lawn Tennis Club will be compatible with the purposes for which the data was acquired.
 4. be kept safe and secure. Arklow Lawn Tennis Club will employ high standards of security in order to protect the personal data under its care. Appropriate security measures will be taken to protect against unauthorised access to, or alteration, destruction or disclosure of any personal data held by Arklow Lawn Tennis Club in its capacity as Data Controller. Access to and management of staff and customer records is limited to those staff members who have appropriate authorisation and password access.
 5. ... be kept accurate, complete and up-to-date where necessary. Arklow Lawn Tennis Club will:
 - ensure that administrative and IT validation processes are in place to conduct regular assessments of data accuracy;
 6. ... be adequate, relevant and not excessive in relation to the purpose(s) for which the data were collected and processed. Arklow Lawn Tennis Club will ensure that the data it processes in relation to Data Subjects are relevant to the purposes for which those data are collected. Data which are not relevant to such processing will not be acquired or maintained.
 7. ... not be kept for longer than is necessary to satisfy the specified purpose(s). Arklow Lawn Tennis Club has identified an extensive matrix of data categories, with reference to the appropriate data retention period for each category. The matrix applies to data in both a manual and automated format. Once the respective retention period has elapsed, Arklow Lawn Tennis Club undertakes to destroy, erase or otherwise put this data beyond use.
 8. ... be managed and stored in such a manner that, in the event a Data Subject submits a valid Subject Access Request seeking a copy of their Personal Data, this data can be readily retrieved and provided to them. Arklow Lawn Tennis Club has implemented a Subject Access Request procedure by which to manage such requests in an efficient and timely manner, within the timelines stipulated in the legislation.

Data Subject Access Requests

As part of the day-to-day operation of the organisation, Arklow Lawn Tennis Club's Committee engage in active and regular exchanges of information with Data Subjects. Where a formal request is submitted by a Data Subject in relation to the data held by Arklow Lawn Tennis Club, such a request gives rise to access rights in favour of the Data Subject. There are specific time-lines within which Arklow Lawn Tennis Club must respond to the Data Subject, depending on the nature and extent of the request. Arklow Lawn Tennis Club's Committee will ensure that they are processed as quickly and efficiently as possible, but within not more than 40 days from receipt of the request. A copy of all the data held in relation to the Data Subject, both hard-copy paper records as well as any electronic records, will be provided to meet this request.

Retention Periods

Arklow Lawn Tennis Club will retain personnel information for the following periods:

- Membership forms will be retained for a minimum period of 1 year following the commencement of your membership and for a maximum period of 5 years following the termination of your membership.
- Membership details be retained in our membership database for a minimum period of your membership and for a maximum period of 5 years following the termination of your membership.
- Competition and league result sheets will be retained for a maximum period of 3 years following the completion of the competition or league.

After the specified period all electronic data will be deleted from the appropriate databases. All paper-based documentation will be shredded. Notwithstanding the other provisions of the above retention periods Arklow Lawn Tennis Club may retain personal data where such retention is necessary for compliance with a legal obligation to which we are subject (for example Revenue Commissioner regulation where a member also acted as an employee of the club), or in order to protect vital interests or the vital interests of another natural person.