



Policy number: Policy 05

Policy Name: Data Protection Policy

Policy Owner: Data Protection Officer

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## Preface

This version of the Data Protection Policy has emerged from the periodic review of the policy and the introduction of a single sports management platform. What follows is the Data Protection Policy as it relates to all systems that are operated and used by Irish Squash.

## Introduction.

The data protection laws include the Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679 (GDPR) which both came into effect on the 25<sup>th</sup> May 2018 (together referred to in this policy as the Data Protection Laws) in the Republic of Ireland. There is an equivalent set of laws relating to this in Northern Ireland.

Having completed a self-assessment guide, Irish Squash Federation CLG (Irish Squash) register with the Data Protection Office (the DPO) and the Information Commissioner's Office (ICO) as a controller of personal data and we are required to comply with the data protection principles set out in the Data Protection Laws.

As a controller of the personal data that we hold, Irish Squash determines the purpose for which, and the manner in which, any personal data are, or are to be, processed.

Irish Squash is fully committed to complying with the requirements of the Data Protection Laws and recognises the importance of protecting the rights of individuals on whom Irish Squash processes personal data.

## Key Definitions

Irish Squash – means Irish Squash Federation CLG.

The Office of the Data Protection Commissioner (the DPC) and the Information Commissioner's Office (the ICO) – are the supervisory authorities responsible for enforcing and monitoring compliance with Data Protection Laws in Ireland & the UK.

Controller – the organisation that determines the purposes for which and manner in which personal data is used, in our case, Irish Squash.

Data subject – a living individual who is the subject of personal data, for example, our members, current, past and prospective employees, members of our clubs, athletes, coaches, volunteers, etc.

Personal data – any information relating to an identifiable person who can be directly or indirectly identified from that information, in particular by reference to an identifier.

Special categories of personal data is defined as personal data revealing a data subject's:

- Racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade Union membership;
- Health;
- Sex life or sexual orientation; and
- Genetic or biometric data where processed for the purpose of uniquely identifying a data subject.

Responsible person – means Irish Squash's Data Protection Officer.

Register of Systems – means a register of all systems or contexts in which personal data is processed by Irish Squash.

Processing – any operation performed on personal data, including collecting, recording, storing, using, disclosing and deleting.

Processor – means a third party who processes personal data on behalf of a controller.

## Section 1: The Policy

### Data Protection Principles

Irish Squash is committed to processing personal data in accordance with its responsibilities as set out in the Data Protection Laws. Irish Squash will ensure that personal data shall be:

- i. “Processed lawfully, fairly and in a transparent manner in relation to the data subject;
- ii. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- iii. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

- iv. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- v. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
- vi. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

## General Provisions

- a) This policy applies to all personal data processed by Irish Squash.
- b) The Responsible Person shall take responsibility for Irish Squash’s ongoing compliance with this policy.
- c) Irish Squash shall register with the Data Protection Commission (Republic of Ireland) & ICO (Northern Ireland) as an organisation that processes personal data.
- d) Irish Squash shall take reasonable steps to ensure personal data is accurate and, where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## Basis and Purposes for Processing Personal Data

- a) To ensure its processing of personal data is lawful, fair and transparent, Irish Squash shall maintain a Register of Systems (See Appendix A).
- b) Before any personal data is processed by Irish Squash for the first time, Irish Squash will review the purposes of the particular processing activity and select the most appropriate lawful basis under the Data Protection Laws, namely:
  - i. Consent;
  - ii. Contract;
  - iii. Legal obligation;
  - iv. Vital interests;
  - v. Public task; or
  - vi. Legitimate interests.
- c) As well as a lawful basis, before any special categories of personal data are processed by Irish Squash for this first time, Irish Squash will select a special condition under the Data Protection Laws, namely:

- i. The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;
- ii. The processing is necessary for Irish Squash to perform our obligations or exercise rights under employment law – this would apply to staff personal data, for example, to maintain attendance and performance records;
- iii. Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- iv. The processing is necessary for substantial public interest reasons – for example, equality monitoring, anti-doping and standards of performance in sport.

d) Irish Squash shall note the appropriate lawful basis and special condition in the Register of Systems.

e) Irish Squash shall include information about the purposes and lawful basis of the processing within our privacy notice provided to individuals.

### Documentation and Records

a) Irish Squash's Register of Systems (Appendix A) records details of all processing activities, including:

- i. A description of the categories of individuals and categories of personal data processed by Irish Squash;
- ii. As per 3. d), the lawful basis and special condition (if applicable) of the processing of personal data by Irish Squash;
- iii. Categories of recipients of personal data with whom Irish Squash shares personal data;
- iv. A description of technical and organisational security measures put in place to keep personal data secure;
- v. Details of how long Irish Squash keeps personal data; and
- vi. Where relevant, details of transfers to countries out with the EU, including documentation of the transfer mechanism safeguards in place.

### Contracts

a) If the data held by Irish Squash is passed to a third party who uses that personal data on behalf of Irish Squash as a 'processor' (for example, to provide services to Irish Squash), the third party must sign a data processing agreement or an agreement with a data processing clause included.

Such agreement or clause must include, as a minimum that the third party shall:

- i. Only act on the written instructions of Irish Squash (unless required by law to act without such instructions);
- ii. Ensure that people processing personal data on behalf of Irish Squash are subject to a duty of confidence;
- iii. Only engage a sub-contractor to process personal data on behalf of Irish Squash with the prior consent of Irish Squash and a written contract;

- iv. Assist Irish Squash in responding to requests from data subjects seeking to exercise their rights under the Data Protection Laws;
- v. Assist Irish Squash in meeting its obligations under the Data Protection Laws in relation to security of processing, the notification of personal data breaches and data protection impact assessments where applicable;
- vi. Delete or return all personal data to Irish Squash as requested at the end of the contract;
- vii. Allow data protection audits and inspections by Irish Squash of personal data held on its behalf (if requested) to ensure that both parties are meeting their requirements under the Data Protection Laws and tell Irish Squash immediately if asked to do something that infringes that Data Protection Laws; and
- viii. Indemnify Irish Squash against any prosecutions, claims, proceedings, actions or payments of compensation or damages, without limitation.

### Security

- a) Irish Squash shall ensure that personal data is stored securely using modern software that is kept up to date.
- b) Access to personal data shall be limited to personnel who need access and appropriate security will be in place to avoid unauthorised sharing of information.
- c) When personal data is deleted, this will be done safely such that the data is irrecoverable.
- d) Appropriate back-up and disaster recovery solutions shall be in place.

### Archiving/Removal

- a) To ensure that personal data is kept for no longer than necessary, Irish Squash shall put in place a process for archiving data in each area of personal data processed. This process will be reviewed annually.
- b) The archiving process shall consider what personal data should/must be retained, for how long, and why.

### Transfer of Data

- a) All personal data held by Irish Squash will not be transferred 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 or a safeguard is put in place.
- b) The safeguards that Irish Squash normally use are:
  - i. Where the recipient is based in the US and are certified under the EU-US Privacy Shield framework; or
  - ii. Where the recipient enters into a contract with Irish Squash including the EU Commission's approved standard contractual clauses.

### The Rights of Individuals

a) Individuals can exercise any of the following rights by writing to us at

[info@irishsquash.com](mailto:info@irishsquash.com)

or

Irish Squash

Irish Sport HQ

Sport Ireland Campus

Blanchardstown

Dublin 15

D15 DY62

b) Data subjects have the following rights under the Data Protection Laws:

- i. A right to request access to the personal data that Irish Squash holds by making a “subject access request”;
- ii. A right to request that Irish Squash corrects or completes personal data;
- iii. A right to request that Irish Squash restricts the processing of personal data for specific purposes;
- iv. A right to request that Irish Squash deletes personal data;
- v. A right to request that Irish Squash deletes personal data; and
- vi. A right to ask Irish Squash to provide personal data for the data subject's reuse for their own purposes.

c) Any requests received by Irish Squash will be considered under the Data Protection Laws as certain rights only apply in specific circumstances.

d) If the data subject is dissatisfied with how Irish Squash has handled their request, they have a right to raise a complaint with the <https://www.dataprotection.ie/en/contact/how-contact-us> in Ireland or the ICO at [www.ico.org.uk](http://www.ico.org.uk) (for Northern Ireland)

### Data Breaches

a) In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Irish Squash shall notify:

- i. The DPC or the ICO within 72 hours where the breach puts individuals’ data at risk
- ii. The individuals concerned as soon as possible where there is a high risk to them as a result of the breach.



b) Data Breaches can be communicated to Irish Squash by email and postal mail - see detailed in Section 8 below.

### Policy Review

a) This policy shall be reviewed at least annually.

b) This policy/function will have no impact on people from any of the equality groups and an Equality Impact Assessment is not required.

## Section 2: Data Privacy Statement/Notice

### 1. Introduction.

This section is an intrinsic part of our policy, and is to be used when consent is being asked of Player, Coach, Referee and Volunteer.

### 2. Declaration.

Irish Squash is committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership or your child's membership with us and/or your relationship with us as a Member/Volunteer/Customer/Participant.

This Privacy Notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

This notice applies to you if you are either:

1. An individual Player of Irish Squash 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 referral;
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. A coach, technical official, teacher, team manager, committee member, volunteer who has registered for membership; or
4. A customer, fan, participant or supporter of Irish Squash 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 Irish Squash.

References to 'we', 'our' or 'us' in this Privacy Notice are to the **Irish Squash T/A Irish Squash, registered in Dublin, Registered Office: Irish Sport HQ, Sport Ireland Campus, Blanchardstown, Dublin 15.**

We have not appointed a Data Protection Officer to oversee our compliance with Data Protection laws as we are not required to do so, but our Data Protection Compliance Committee has overall responsibility for data protection compliance in our organisation.

Contact details are set out in the "**Contacting Us**" section at the end of this Privacy Notice.

### 3. Personal Information we may collect from 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 you or your child:

- i. personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- ii. date of birth;
- iii. gender;
- iv. details of family members and emergency contacts;
- v. bank account details for payment of any out of pocket expenses;
- vi. records of your volunteering history
- vii. any identification documents
- viii. all information included as part of the volunteering application or education process; o referee details and any references provided;
- ix. performance including any feedback provided to us by yourself, members of staff or other third parties; o the location in which you are volunteering;
- x. use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, usernames and other IT system identifying information;
- xi. membership details including start and end date;
- xii. records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- xiii. 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;
- xiv. use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- xv. information obtained through electronic means such as swipe card and key fob records; o records of your attendance at any events or competitions hosted by us;
- xvi. images in video and/or photographic form and voice recordings; and
- xvii. your marketing preferences so that we know whether and how we should contact you.

## Players/Participants

If you are a Player 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:

- i. identification documents such as passport and identity cards;
- ii. details of any club membership and school/university being attended;
- iii. details of next of kin, family members, coaches and emergency contacts;
- iv. records and assessment of any player rankings, grading or ratings, competition results, details regarding events/games attended and performance (including that generated through player pathway programme);
- v. any disciplinary and grievance information;
- vi. any details required for the purposes of awarding scholarship funding or grants (including any means testing);

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

If you have registered with/involved with us/partaking in our ***coaching/teaching 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:

- i. any coaching code or official number;
- ii. your current affiliated club or other organisation (if applicable);
- iii. coaching/teaching qualification and/or officiating history (if any);
- iv. accreditation/qualification start and end date;
- v. information legally required for Child Protection/Safeguarding purposes;
- vi. Identification documents such as passport, utility bills, identity cards, Garda Vetting Disclosure etc.

## 4. Special Categories of Personal Information

We may also collect, store and use some or all of the following “**special categories**” of more sensitive personal information regarding your:

- I. information about your race or ethnicity, religious beliefs and sexual orientation;
- II. information about your health, including any medical condition, health and sickness records, medical records and health professional information;
- III. biometric information about you, for example fingerprints, retina scans; and
- IV. Information about your criminal history, if any.

In relation to the special category personal data that we do process we do so on the basis that:

- I. the processing is necessary for reasons of substantial public interest, on a lawful basis;
- II. it is necessary for the establishment, exercise or defence of legal claims;

- III. 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
- IV. based on your explicit consent.

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 on the basis of legal obligations or based on your explicit consent.

## 5. 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 Irish Squash 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.

If you are a Player, Coach, Manager, Administrator, Volunteer, participant we also may collect personal information about you from any club, school, third level institution 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. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

### 1. Uses made of the 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.

<b>All Members/Volunteers/Customers/Participants</b>		
Purpose	Personal information used	Lawful basis

<p><b>Making a decision about your appointment as a volunteer and managing the appointment process</b></p>	<p>All the personal information we collect from you as part of the application process. Records of volunteering history. Referee details and any references.</p>	<p>We need this information to be able to perform and administer your relationship with us as a volunteer.</p>
<p><b>Paying you for any out of pocket expenses</b></p>	<p>Transaction and payment information.</p>	<p>Where you have given us your consent to do so.</p>
<p><b>Dealing with legal disputes involving you, or any other volunteers, including accidents</b></p>	<p>All non-‘special categories’ of personal information.</p>	<p>We have a legitimate business interest to ensure that all legal claims are managed effectively. We also have a legal obligation to report any accidents at a workplace in accordance with health and safety legislation.</p>
<p><b>To prevent and detect criminal or improper acts</b></p>	<p>Identification documents.</p>	<p>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.</p>
<p><b>Storage of records relating to you and also records relating to our organisation</b></p>	<p>All non-‘special categories’ of personal information.</p>	<p>We need this information to be able to fulfil our obligations to you.</p>
<p><b>To send you information we think that you might find useful or which you have requested from us, including our newsletters, information about volunteering opportunities and other ways of supporting our organisation or the sport, provided that you have indicated that you are happy to be contacted for these purposes.</b></p>	<p>Personal contact details such as name, title, email addresses and telephone numbers.</p>	<p>Where you have given us your consent to do so.</p>

<p><b>To arrange and administer your attendance at an event for which you have volunteered.</b></p>	<p>Personal contact details. Details of family members and emergency contacts.</p>	<p>This is necessary to enable us to register you on to and properly manage and administer your attendance at the event.</p>
<p><b>To assess your performance as a volunteer</b></p>	<p>Performance including any feedback provided to us by yourself, members of staff or other third parties.</p>	<p>We may have a legitimate interest to ensure your suitability for any future volunteering roles and to ensure that your volunteering experience with us is positive and worthwhile.</p>
<p><b>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</b></p>	<p>All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.</p>	<p>This is necessary to enable us to properly manage and administer your membership contract with us.</p>
<p><b>To arrange and manage any contracts for the provision of any merchandise, products and/or services.</b></p>	<p>All contact and membership details. Transaction and payment information.</p>	<p>This is necessary to enable us to properly administer and perform any contract for the provision of merchandise/products/services.</p>
<p><b>To send you information which is included within your membership benefits package, including details about your insurance, competitions and events, partner offers and discounts and any updates on the organisation, events, programmes available.</b></p>	<p>All contact and membership details</p>	<p>This is necessary to enable us to properly manage and administer your membership contract with us.</p>

<p><b>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</b></p>	<p>All contact and membership details and marketing preferences.</p>	<p>We have a legitimate interest in ensuring that you are informed about the organisation and what is going on to enable the Club and affiliated members to avail of what is on offer..</p>
<p><b>To answer your queries or complaints</b></p>	<p>Contact details and records of your interactions with us.</p>	<p>We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership/relationship with us.</p>
<p><b>Retention of records</b></p>	<p>All the personal information we collect.</p>	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership/relationship and in some cases, we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent</p>
<p><b>To arrange, administer and manage your involvement in one of our programmes, events, courses for which you have registered</b></p>	<p>All contact and membership details. Transaction and payment information.</p>	<p>This is necessary to enable us to properly administer and perform any contract for the provision of merchandise/products/services.</p>

<b>The security of our IT systems</b>	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
<b>To conduct data analytics studies to better understand event attendance and trends within the sport</b>	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
<b>For the purposes of promoting the sport, our events and membership packages.</b>	Images in video and/or photographic form.	We have a legitimate interest in ensuring that you are informed about the organisation and what is going on.
<b>To comply with health and safety requirements</b>	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.
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b>	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
<b>Players</b>		
Establish nationwide register of Players to calculate rating and ensure player is affiliated to National Body & Insured.	Player Name, Date of Birth, email.  Please see Appendix A	This is necessary to manage the sport, support funding models and support applications for funding and provide grants.



<p>To conduct performance reviews, manage performance and determine performance requirements and administer your development and training requirements on any player pathway programme</p>	<p>All performance and attendance data and information about your health and medical condition. Details of any affiliated club membership.</p>	<p>This is necessary to enable us to properly manage and administer your development through the performance programme. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p>To make decisions about your progression and development through any player pathway programme and to assist with the delivery of rankings and ratings</p>	<p>All performance and attendance data and information about your health. Details of any affiliated club membership.</p>	<p>This is necessary to enable us to properly manage and administer your development through the performance programme. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p><b>To administer and monitor your attendance at events and competitions</b></p>	<p>All non-medical performance and attendance data. Details of any affiliated club membership.</p>	<p>This is necessary to enable us to register you on to and properly manage and administer your development through the performance programme.</p>
<p><b>To arrange for any trip or transportation to and from an event</b></p>	<p>Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.</p>	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>

<p><b>To administer any drug and alcohol testing</b></p>	<p>Health and medical information</p>	<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p><b>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 monitor and manage sickness absence</b></p>	<p>Health and medical information</p>	<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p><b>To gather evidence for possible grievance or disciplinary hearings</b></p>	<p>All the personal information we collect including any disciplinary and grievance information.</p>	<p>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. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p><b>To assess your eligibility for and to provide any scholarship funding and/or grants</b></p>	<p>All details required for the purposes of awarding scholarship funding or grants (including any means testing)</p>	<p>This is necessary to enable us to properly administer and perform any contract for the provision of funding.</p>

<b>Record Player History over time.</b>	All details relating to any event, and records the results of the game and venue.	To record these results for the history of the sport. Retention is indefinite as a record of club sporting results.
<b>Coaches, Officials, Customers</b>		
<b>To administer your attendance at any courses or programmes you sign up to</b>	All contact and other details, transaction and payment data. Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history.	This is necessary to enable us to register you on to and properly manage and administer your development through the course and/or programme.
<b>To conduct performance reviews, managing performance and determining performance requirements</b>	All performance and attendance data and information about your health. Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history. qualification start and end dates.	This is necessary to enable us to properly manage and administer your development through the course and/or programme. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>To make decisions about your progression and accreditation status</b>	As above.	As above.
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to</b>	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

comply with our safeguarding requirements		
To administer any drug and alcohol testing	Health information	We have a legal obligation and a legitimate interest to provide you & other members of our organisation with a safe environment in which to participate in sport. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
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. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.

For some of your personal information you 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 admit you as a member or at one of our courses, events or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your position as a member or not allow you to participate on our course/programme/event. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not 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 described in the “**Contacting Us**” section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdraw 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. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

## 2. Marketing

**Email and Post Marketing:** from time to time, we may contact you by email, post or other means with information about products and services that we deliver that we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by contacting us at [info@irishsquash.com](mailto:info@irishsquash.com). You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

## 3. Disclosure of your personal information

We share personal information with the following parties:

- i. **Any party approved by you.**
- ii. **To our staff, coaches, officials, managers:** to allow them to properly administer the sports on a local, regional and national level.
- iii. **Other service providers:** for example payment processors, data analysis, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
- iv. **Our supply chain partners and subcontractors,** such as couriers, import/export agents, shippers;
- v. **Our Commercial Partners:** for the purposes of providing you with special offers, opportunities, products and services and other commercial benefits provided by our commercial partners;
- vi. **The Government or our Regulators (for example: Sport Ireland, Coaching Ireland, Institute of Sport, Sport NI Institute):** 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.
- vii. **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.
- viii. **National Governing Bodies & other Squash Bodies:** to enable Irish Players, Coaches and Team Managers to enroll and participate in international tournaments and events.

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

#### 4. 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 party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "**Contacting Us**" section below.

#### 5. How long do we keep personal information for?

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:

- i. 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 Irish Squash then you are able to update your personal information that we hold about you through our 'Go Membership' Database. Alternatively, you can contact us by using the details set out in the "**Contacting Us**" section below.

#### 6. Your rights in relation to personal information

You have the following rights in relation to your personal information:

- i. the right to be informed about how your personal information is being used;

- ii. the right to access the personal information we hold about you;
- iii. the right to request the correction of inaccurate personal information we hold about you;
- iv. the right to request the erasure of your personal information in certain limited circumstances;
- v. the right to restrict processing of your personal information where certain requirements are met;
- vi. the right to object to the processing of your personal information;
- vii. the right to request that we transfer elements of your data either to you or another service provider; and
- viii. 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/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting Us**" section below.

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.

## 7. Changes to this notice

We may update this Privacy Notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

## 8. Contacting us

In the event of any query or complaint in connection with the information we hold about you, please email [info@irishsquash.com](mailto:info@irishsquash.com) or write to us at

Paul Nugent  
Chief Operating Officer  
Irish Squash  
Irish Sport HQ,  
Sport Ireland Campus,  
Blanchardstown,  
Dublin 15,  
Ireland



## Appendix A : Register of Systems

The following register of Systems used by Irish Squash operates within this policy

Ref	System/Service Name	Manufacturer	Purpose	Comments	Data Categories
1	SportyHQ	SportyHQ	<p>Sports Management Platform for Community that manages affiliation, events, club administration and player rating/ranking.</p> <p>www.sportyhq.com</p>	<p>Support service provided by SportyHQ based on a five year term set out in the Service Agreement and is available to any club and province as part of their affiliation to Irish Squash.</p> <p>This is Governed by this Data Privacy Agreement and that of SportyHQ Data Privacy Agreement</p>	<p>Data that is captured;</p> <ol style="list-style-type: none"> <li>1. Subject Name (First, Middle &amp; Second),</li> <li>2. Date of Birth,</li> <li>3. Postal Address,</li> <li>4. Email Address,</li> <li>5. Squash Rating &amp; Ranking,</li> <li>6. Phone Number,</li> <li>7. Irish Squash Membership Number,</li> <li>8. WSF SPIN #,</li> <li>9. Irish Squash Membership History (Date &amp; Type),</li> <li>10. Playing History (Event, Date &amp; Result),</li> <li>11. Affiliated Club &amp; Province</li> <li><b>12. Next of Kin and/or Guardian Details (for Child) - Name &amp; Mobile Number</b></li> <li><b>13. Photograph (in play and presentation) &amp;</b></li> <li><b>14. Video (in play and presentation)</b></li> </ol>

2	Google Drive	Google	Suite of productivity tools for the Irish Squash Board and Management Team including email, contacts and file repository  @irishsquash.com	Licences changed on a monthly basis, and technical support provided by iPlanit www.iplanit.ie	Irish Squash Policies & Procedures  Information on projects  Board Matters
3	Irish Squash Website	Iplanit	Provide an on-line resource and used as a communication resource on the web.  www.irishsquash.com	Maintained by iPlanit on behalf of Irish Squash.	Competition Results Names and pictures of winners of tournaments Various stories relating to Irish Squash events
4	Tournament Software	Visual Reality	Laptop based application used to setup and run tournaments.  <a href="http://www.tournamentsoftware.com">www.tournamentsoftware.com</a>	Maintained by Visual Reality	Names, email address, DOB, club, of persons who have entered competitions
5	ClubForce	Clubforce	Cloud based application that manages the club affiliations  <a href="http://www.clubforce.com">www.clubforce.com</a>	Maintained by Clubforce to be superseded by SportyHQ	Name, email address, membership type, age grade, club
7	Excel	Excel	Rating for Junior, Senior & Masters	File based system store on Website and in a variety of administrators PCS.....	Name, DOB, Tournament results
9	Coaching Laptop	Dell	Administration of coaching secretary	Managed by Coaching Secretary	Information on coaching matters including , names of coaches, persons who have done

					courses and general information relating to coaching matters and administration
10	Irish Squash Laptop e	Dell	Administration of Operating Officer	Managed by Chief Operating Officer (COO)	Information on Irish Squash administration matters including , names of coaches, persons who have done courses and general information relating to coaching matters and administration
11	YouTube	You Tube	Library of past matches from tournaments	Managed by You Tube & Irish Squash	Past matches from Irish Squash tournaments
11	Facebook	Facebook	Promote squash events and news to our followers	Managed by You Facebook & Irish Squash	News from Irish Squash related events/tournaments/general squash stories
12	Twitter	Twitter	Promote squash events and news to our followers	Managed by Twitter & Irish Squash	News from Irish Squash related events/tournaments/general squash stories
13	Board Member Mail Accounts	Gmail	Provide capacity for the Board Member to communicate, store and manage information to fulfil their role on the board.	Comprehensive Cloud Based Solution with password and auditing capability governed by Irish Squash	Information relating to board matters and in relation to the particular brief of that board member
14	Mobile Phone	Samsung	General communication with members and persons about Irish Squash matters	Managed by Irish Squash COO	Contacts
15	Paper Folders	N/A	Records of administrative matters for Irish Squash	Managed by Irish Squash Personnel	Various information/files on Irish Squash administration
16	Tablets	Samsung	Used by referees to score matches with the SportyHQ app	Managed by Irish Squash Personnel	No data stored. Exclusive use for scoring matches via the app only and is secured by the secure web based SportyHQ service.
17	Squash Levels	Squash Levels Ltd.	Facilitates the seeding of tournaments based on results	Squash Ireland Entry Conditions as agreed by players	Tournament results including name, club and N.G.B. affiliation transferred through SportyHQ

