



# OLYMPIC FEDERATION OF IRELAND PRIVACY POLICY

## 1. INTRODUCTION

The Olympic Federation of Ireland (“OFI”, “us”, “we” or “our”) is the International Olympic Committee’s recognised national Olympic committee for Ireland with responsibility for developing and promoting the Olympic movement in Ireland.

We are committed to protecting and respecting your privacy and our use of your personal information is governed by this Privacy Notice. This Policy explains how we collect, use, process, and disclose any personal data that you provide to us, including personal information collected on our website [www.olympics.ie](http://www.olympics.ie) (the “Website”) and how we keep it secure. We may also, in the future, interact with you via social media channels (such as LinkedIn, Twitter, Facebook etc). If you submit any information to us via social media facilities controlled by us, we shall deal with it according to this Privacy Policy.

This complies with new laws that came into effect from May 2018 (“GDPR”).

This policy does not apply to third-party websites, products, or services, even if they link to our services or website, and you should consider the privacy practices of those third-parties carefully before you submit any personal data to these websites. The OFI does not accept any responsibility for these policies.

Please read the following carefully to understand our practices regarding your personal data.

## 2. INFORMATION WE COLLECT

During the course of our activities the OFI will collect, store and process personal information and the OFI recognises the need to treat it in an appropriate and lawful manner.

Personal information is any information that tells us something about you (“Personal Data or “Personal Information”). This could include information such as name, contact details, date of birth or any information about your needs or circumstances which would allow us to identify you. The types of information that the OFI may be required to handle include details of current, past and prospective athletes, employees, volunteers, management, members, suppliers and others that we communicate with. That information may be held on paper, on a computer or other media. You also have certain rights in relation to personal data we hold.

We have set out our practices and your rights in further detail at Schedule 1 below.

## 3. CONTACT US

We have appointed a Data Protection Liaison (“DPL”) who has overall responsibility for data protection compliance in our organisation. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [admin@olympicsport.ie](mailto:admin@olympicsport.ie).

If you have any concerns or complaints about how we are handling your data please do not hesitate to get in touch. More information about your legal rights can be found on the Office of the Data Protection Commissioner’s website at <http://gdprandyou.ie/>

## SCHEDULE 1



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<b>Categories of Personal Data we collect</b>	<p>You may provide us with or we may obtain <b>personal information</b> about you, such as information regarding your:</p> <ul style="list-style-type: none"><li>• name, title, gender, date of birth, email addresses and telephone numbers, signatures, membership affiliations, passport copies, PPS / social services numbers, driver's license or other forms of identification;</li><li>• details of next of kin, contacts and emergency contacts;</li><li>• images or videos or other details from any competitions, events or training sessions;</li><li>• payment or bank details so that we can receive payments from you for OFI activities or you can receive funding from us and details of the financial transactions with you;</li><li>• your computer's IP address, and other browsing data that allows us to track your usage of our website.</li></ul>
<b>Special Categories of personal data</b>	<p>We also store and use "<b>special categories</b>" of more sensitive personal information regarding your medical history and specifically any condition that might affect your performance, including details of allergies, vaccinations, and medications taken, and data gathered for anti-doping purposes.</p> <p>Please note that where you give us any sensitive personal data, including but not limited to medical data, we will treat this with the utmost confidentiality and only disclose it where we have a legal obligation to do so, or where you have explicitly consented to it.</p> <p>This means that if you are travelling to a competition or event, and we need to share your sensitive personal data with any third party, we will seek your consent in advance.</p>
<b>Our sources of the personal data</b>	<p>We obtain personal data when you:</p> <ul style="list-style-type: none"><li>• fill in forms on our Website or otherwise including (but not limited to) entry forms, medical forms and assessment forms;</li><li>• contact us by phone, email or in any other means;</li><li>• browse our Website;</li><li>• make a query on our Website;</li><li>• compete on Irish representative teams at Olympic events, or partake in trainings;</li><li>• engage with us as a contractor, employee, volunteer or supplier;</li><li>• purchase any tickets or services from us;</li><li>• register to attend an event / workshop that is run or promoted by us;</li><li>• become involved in any dispute, tribunal, complaints or disciplinary issue under our rules;</li><li>• Partake in any online and email marketing campaigns related to our services or an event that you might receive or subscribe to.</li></ul>
<b>Automated decisions</b>	None
<b>Purposes and basis for processing personal data</b>	<p>We may use Personal Data for the following purposes:</p> <ul style="list-style-type: none"><li>• To maintain a record of your relationship with the OFI and your participation in any event, competition, training, or otherwise with or on behalf of the OFI; and for</li></ul>



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	<p>statistical purposes;</p> <ul style="list-style-type: none"><li>• To ensure your safe participation in any Olympic related event;</li><li>• To carry out our obligations arising from any contracts or agreements entered into between you and us.</li><li>• For inclusion in international and/or national ranking lists (as required).</li><li>• To promote any campaigns or work undertaken by OFI</li><li>• To deal with your queries and provide you with information or services</li><li>• To notify you about changes to our services.</li><li>• To optimise team preparation and training for Olympic events.</li><li>• Retention of records</li><li>• To receive or make payments re: entry into events or otherwise:</li><li>• To administer any selection disputes or gather evidence for possible grievance or disciplinary hearings</li><li>• To protect and enhance the security of our IT systems</li><li>• To comply with legal obligations, for example, the prevention of fraud or complying with Garda vetting requirements</li><li>• To improve our service offering to you and to send you communications which you have requested and / or that may be of interest to you.</li></ul> <p>Our legal bases for this processing are generally either (i) the consent that you provided (ii) the fact it is necessary for the performance of a contract with you, or (iii) the fact that we have legitimate interests in the processing.</p>
<b>Who we will disclose your personal data to</b>	<p>We may disclose your personal data to:</p> <ul style="list-style-type: none"><li>• Sport Ireland, Sport NI or the Irish Institute of Sport/SINI</li><li>• Any party approved by you;</li><li>• Staff and Volunteers who work at venues to support the delivery of OFI or Olympic events;</li><li>• Business partners in order to provide services as required and/or requested by OFI or our Olympic partners;</li><li>• Other service providers for example our IT advisors;</li><li>• Other government bodies or regulators or companies, where we are required to do so by law or for the prevention of fraud / credit risk reduction;</li><li>• Any international based service providers who process competition and statistical data</li><li>• Third parties who run events, in order to facilitate your entry and participation in that event or competition.</li><li>• In order to enforce or apply our Terms and Conditions and other agreements; or to protect the rights, property, or safety of the OFI, our members, or others.</li></ul>
<b>Your rights and choices</b>	<p>We want to be as transparent as possible in our processing.</p> <p>You have the right of access to your personal data and, in some cases, to require us to restrict, erase or rectify it (if it is inaccurate or out of date, for example if you change your email address) or to object to our processing it, and the right of data portability. We endeavour to keep your data accurate, complete and up to date.</p> <p>Where you have given your consent to any processing of personal data, you have the right to withdraw that consent at any time. If you do, it will not affect the lawfulness of</p>



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	<p>any processing for which we had consent prior to your withdrawing it. The withdrawal of consent may impact on our ability to perform certain administrative and other functions for you. You have the right to ask us not to process personal data for our marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we to collect data or by opting-out at the end of any marketing communication we send you.</p> <p>If you have any questions about your rights or want to exercise any of these rights, please contact our DPL at <a href="mailto:admin@olympicsport.ie">admin@olympicsport.ie</a> for further details.</p> <p>More information about your legal rights can be found on the Office of the Data Protection Commissioner's website at <a href="http://gdprandyou.ie/">http://gdprandyou.ie/</a></p>
<b>Location of your personal data &amp; Security</b>	<p>We will keep your personal data within the EEA to the extent possible. However, where you participate in an event that is run by a third party outside of the EEA, we may transfer limited personal data to facilitate your entry and participation in that event or competition. Where this occurs, we will endeavour to take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.</p> <p>We store information on our secure cloud-based server. The security of your Personal Information is important to us. It is important to note that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.</p>
<b>How long we will keep your personal data for</b>	<p>We will not retain your personal data for longer than is reasonable and necessary for the purposes for which it was collected.</p> <p>The specific length of time will depend on the type of information and the reason we collected it from you. See Schedule 2 for further details. In the absence of any legal or regulatory requirement, we generally retain all physical and electronic records for a period of five years after your last contact with us. In the case of Garda Vetting information, we will retain it for 12 months after the renewal period has expired. Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired.</p>
<b>Changes to this Notice</b>	<p>Any changes we may make to this policy in the future will be posted on this page.</p>

### SCHEDULE 2



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### RETENTION PERIODS

The following are our maximum data retention periods which should be calculated from the end of the calendar month following the last entry or activity on the file or document:

TYPE OF INFORMATION	MAXIMUM RETENTION PERIOD	HOW TO DESTROY/ARCHIVE
Participant data including contact details, emails and correspondences	5 years from departure from active competition	<ul style="list-style-type: none"><li>• Archive in a secure location with limited access after 12 months since previous competition</li><li>• Shred physical files and delete from IT systems, address books, mobile phones after 5 years</li></ul>
Medical Records	2 years	<ul style="list-style-type: none"><li>• Shred physical files and delete from IT systems after 2 years</li></ul>
Documents relevant to current or potential litigation, investigations, inquiries	DO NOT DESTROY	<ul style="list-style-type: none"><li>• CEO retains</li><li>• Copies of Identification documents, 'Garda Vetting applications' and positive disclosures</li><li>• Under Irish Law there is a positive obligation to preserve documents where litigation is anticipated or ongoing. These documents must be preserved and not destroyed</li></ul>

### SCHEDULE 3

#### COOKIES

Cookies are pieces of information that a website transfers to your internet browsing device to store and sometimes track information about you. Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that. However, you may not be able to take full advantage of a website if you do so. Cookies are specific to the server that created them and cannot legally be accessed by other servers, which means they cannot be used to track your movements around the web. We use cookies to estimate our audience size and patterns; control how often visitors see similar ads; and track preferences and to improve and update our Site.

Our website may use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

*Updated: 5 February 2019*