

## **DUFC PRIVACY STATEMENT**

As you would reasonably expect, D.U.F.C. has a legitimate interest in obtaining and holding certain of members' and employees' personal data, processing it and sharing it with other members, coaches, club management, Trinity College entities and the IRFU (and affiliates including the Leinster Branch IRFU and the Irish Universities Rugby Union) for the purpose of maintaining a sustainable, effective and successful College rugby club.

We respect and value your privacy and this statement is therefore your guide to the principles of privacy and confidentiality which govern the collection, use, strategic disclosure and retention of your Personal Data by the Club.

### **Personal Data**

Personal Data is data that identifies you or can be used to identify or contact you.

We may collect, store and process personal data about you which we may obtain either directly from you, from Trinity College or from public information sources.

This may include Personal Data about you such as your name, address, contact details, gender, date of birth, occupation, nationality, image and your next of kin or any other information the Club might reasonably be expected to need for its effective management.

We may collect and process some special categories of Personal Data about you with regard to health and fitness. This may include any information relating to injuries you receive while playing rugby at any level, general fitness information, information on any pre-existing medical conditions you may have, information obtained in the course of anti-doping measures and information on any disability or mobility requirements you may have.

### **Legal Basis for Collecting, Storing and Processing your Personal Data**

#### ***Legitimate interest***

It is in our legitimate interest to collect and process your Personal Data for a range of operational, business and organisational purposes as you would reasonably expect of a rugby club:

##### **(a) Administration of Rugby**

Tracking statistics and performance details across all rugby union matches played in the club; maintaining records of those involved with rugby at all levels, including referees, coaches, volunteers and others engaged in the running of the club, including preparing public facing directories of certain of this information.

Recording injury data for the management of player welfare and reporting serious injuries to the IRFU.

Preparing handbooks of contact information of committee members and others involved in the administration of rugby at provincial and national level.

To register you as a player, member or volunteer with the club; and to maintain your registration within the database of registered players.

(b) Business and Operational

- To develop and maintain our relationship and engagement with you or your organisation
- To utilise your personal data for the purposes of communicating with you and others about club news as well as activities and fundraising, all via social media, email or website platforms.
- To invite you to and host you at our events and meetings;
- To facilitate purchase, subscription and marketing activities:
- To process and respond to any enquiries, requests and complaints

When we process your Personal Data, based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not process your Personal Data for activities where our interests are overridden by the impact on you.

***Compliance with a Legal Obligation***

We may process your Personal Data where it is necessary:

(1) to comply with legal obligations to which we are subject:

- To comply with our obligations under Irish and EU laws, including but not limited to safeguarding and complying with law enforcement requests; and
- in particular to comply with our obligations under the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012-2016.

(2) To Defend, Establish or be a Party to Legal Claims

We may process your Personal Data as necessary in order for us to establish, investigate, institute or defend a legal claim to which you are a party.

**Sharing and Disclosure of Your Personal Data**

We may disclose your personal data to the Leinster Branch, the IRFU, IURU, relevant entities of Trinity College and, as required for the effective running of the Club, to coaches, management, volunteers of the Club and any outside agency as necessary to facilitate support services for the club.

We may share your Personal Data to facilitate rugby games and competitions at provincial and national level.

We will only disclose your personal information to Regulatory Authorities, Law Enforcement Agencies, Public Bodies and third party Companies to comply with any applicable legal

obligation, court order, summons, search warrants, or any other legal or regulatory obligation or request to which D.U.F.C. is subject.

## **Data Retention**

In accordance with our policy on data retention we shall keep your Personal Data which we process on the basis of your involvement with D.U.F.C. for a period of time after your engagement with the Club and depending on why you have interacted with us. Please note that in certain circumstances, we may hold your Personal Data for a longer period if we believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your Personal Data. Where you have registered as a rugby player, we may also retain some of your Personal Data within our player registration database unless you request us to delete such information. We may also continue to hold your Personal Data if we understand that you wish to receive ongoing communications concerning D.U.F.C., such as through receipt of the Mailchimp E-Bulletin.

## **Processing your Personal Data for Purchase, Subscription and Marketing purposes**

### ***How we process your Personal Data for Purchase, Subscription and Marketing Purposes***

We may process your Personal Data in connection with purchase, subscription and marketing purposes whenever you purchase match tickets, merchandise or other products from the Club or our authorised sellers or when you subscribe to the Mailchimp E-Bulletin.

You may opt out of receiving the Mailchimp E-Bulletin by following the unsubscribe instructions therein.

We may process your payments through our third party payment providers

### ***What Personal Data we process for Purchase, Subscription and Marketing Purposes***

We may collect and process the following Personal Data about you to:

- enter you into competitions and contests
- conduct surveys, which you can opt-out of;
- gain an insight into the preferences and behaviour of our members
- better understand where we can make improvements; and
- invite you to give feedback and to analyse same

Individual Details: This may include general Personal Data as described above

Customer Account Information: This is information that you provide to us when creating an account with the club and subsequently make purchases. This information may include your name, date of birth, phone number, email address, billing address, shipping address, phone number and credit card information.

If you choose to purchase any items from club shop for a third party beneficiary, you need to provide us with information about the beneficiary during the purchase process. In such

circumstances, it is your responsibility to make sure the beneficiary or beneficiaries would have no objection to you sharing their Personal Data for the purposes set out in this Notice.

### **Storing of and Transfer of Your Personal Data**

Your Personal data may be stored and transferred inside or outside the European Economic Area (“EEA”). We only transfer your Personal Data outside the EEA where the EU Commission has decided that the third country in question ensures an adequate level of protection in line with EU data protection standards or if there are appropriate safeguards in place to protect your data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will always do our best to protect your Personal Data, we cannot guarantee the security of any information you transmit to us; any transmission is at your own risk. Once we have received your information, we will endeavour to use strict procedures and security features to try to prevent unauthorised access.

### **Your Rights and How to Exercise Them**

You have a number of rights regarding access to and control of your personal data, including:

- Right of Access
- Right to Complain
- Right of Erasure
- Right to Object
- Right to Portability
- Right to Rectification
- Right to Restriction

You can exercise any of these rights by submitting a request to the Club Chairman whose contact details are set out at the bottom of this statement.

If you have any concern in relation to how your Personal data is being used or processed please contact the Club Chairman as above. If you have continuing concerns with regard to how your Personal Data is used or processed you have the right to lodge a complaint with the Data Protection Regulator.

### **John Boyd**

Chairman,

Executive Management Committee, D.U.F.C.

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