



Baldoyle District Badminton Club Privacy Policy

Revision 1

'A Privacy Policy document, detailing how the Club uses members Data on the Club Website, the types of data and the purposes for and uses of such data'

[Effective May 2018]



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1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 In this policy, "we", "us" and "our" refer to *Baldoyle District Badminton Club*. [For more information about us, see Section 12.]

2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

We must retain the above credit. Use of this document without the credit is an infringement of copyright. However, we can purchase from SEQ Legal an equivalent document that does not include the credit.

3. How we use your Personal Data

- 3.1 In this Section 3 we have set out:
 - (a) The general categories of personal data that we may process;
 - (b) The purposes for which we may process personal data; and
 - (d) The legal bases of the processing.
- 3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.

This usage data may be processed for the purposes of analyzing the use of the website and services. The legal basis for this processing is consent and/or our legitimate interests, namely monitoring and improving our website and services.
- 3.3 We may process your contact data ("**contact data**"). The contact data may include your name, mobile/home phone number/s and email address/s.



The source of the contact data is you. The contact data may be processed primarily for the purposes of contacting you regarding Teams, facilitating you to contact your respective team-mates/subs and secondarily for sharing Club News, Updates, operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent and/or our legitimate interests, namely the proper administration of our website and business.

- 3.4 We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent and/or our legitimate interests, namely the proper administration of our website and business.
- 3.5 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and facilitating the ordering of relevant goods and/or services to you. The legal basis for this processing is consent.
- 3.6 We may process information relating to placing an order for Club Team Wear, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, email/phone number details and the transaction details. The transaction data may be processed for the purpose of supplying the ordered goods and services and keeping proper records of those transactions.

Please Note! We do NOT facilitate payment for goods on the website and no Debit/Credit card data is currently asked for or stored.

The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.

- 3.7 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.
- 3.8 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.

The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

- 3.9 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.



The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

- 3.10 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.11 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.12 Please **do not** supply any other person's personal data to us, unless we prompt you to do so.

4. Providing your Personal Data to Others

- 4.1 We **DO NOT** disclose your personal data to anyone/3rd parties outside of the Club

5. Retaining and Deleting Personal Data

- 5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 5.3 **We will retain your personal data as follows:**
- (a) *Your Name, Contact Number/s, and Email Address/s* will be retained for a minimum period of *3 months* from commencement of your membership and for a maximum period of *12 months*.
 - (b) Upon commencement of the new season you will be asked once again to either Give or Withdraw your Consent to our holding of your data.
 - (c) Once you leave the Club your data will be deleted within a reasonable timeframe.
- 5.4 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.



6. Amendments

- 6.1 We may update this policy from time to time by publishing a new version on our website.
- 6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 6.3 We may and/or will notify you of changes OR significant changes to this policy by email or through the private messaging system on our website.

7. Your Rights

- 7.1 In this Section 7, we have summarized the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 7.2 Your principal rights under data protection law are:
 - (a) The right to access;
 - (b) The right to rectification;
 - (c) The right to erasure;
 - (d) The right to restrict processing;
 - (e) The right to object to processing;
 - (f) The right to data portability;
 - (g) The right to complain to a supervisory authority; and
 - (h) The right to withdraw consent.
- 7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data.

Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. Please contact the Club Committee through the Club Email: baldoyle_district_bc@yahoo.ie
- 7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.



- 7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 7.9 To the extent that the legal basis for our processing of your personal data is:
- (a) Consent; or
 - (b) That the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7.10 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection.



You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

- 7.11 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 7.12 You may exercise any of your rights in relation to your personal data by written notice to us and/or by email or text.

8. About Cookies

- 8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.
- 8.4 When a visitor first accesses our site, they will receive a cookie notification which they are asked to agree with.

9. Cookies that we use

- 9.1 We use cookies for the following purposes:
 - (a) Authentication - we use cookies to identify you when you visit our website and as you navigate our website. Cookies used for these purpose are as follows: See Cookie List on the following page.
 - (b) Status - we use cookies to help us to determine if you are logged into our website. See cookie list
 - (c) Personalisation - we use cookies to store information about your preferences and to personalise the website for you. Cookies used for this purpose are: See cookie list
 - (d) Security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally. Cookies used for this purpose are: See cookie list



- (e) Advertising – ***Note! We currently do not display advertising on our website but hereby advise that we may exercise this right at any time in the future.*** If and when we choose to advertise we will use cookies to help us to display advertisements that will be relevant to you. Cookies used for this purpose are: See cookie list
- (f) Analysis - we use cookies to help us to analyse the use and performance of our website and services. Cookies used for this purpose are: See cookie list
- (g) Cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally. Cookies used for this purpose are: See cookie list

Cookie List

Cookie name	Life span	Purpose
svSession	Permanent	Communication between site owner and visitor (Wix Chat)
hs	Session	Security
XSRF-TOKEN	Persistent cookie	Security
smSession	Two weeks	Identifies logged in site members
TSxxxxxxxx (where x is replaced with a random series of numbers and letters)	Permanent	Security
TSxxxxxxxx_d (where x is replaced with a random series of numbers and letters)	Permanent	Security

10. Cookies used by our Service Providers

- 10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 10.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies.



The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:

<https://www.google.com/policies/privacy/>. The relevant cookies are available to view on: <https://policies.google.com/technologies/types>

- 10.3 We may in the **future** publish Google AdSense interest-based advertisements on our website. These are tailored by Google to reflect your interests. To determine your interests, Google will track your behaviour on our website and on other websites across the web using cookies.

To determine your interests, Google will track your behaviour on our website and on other websites across the web using cookies. This behaviour tracking allows Google to tailor the advertisements that you see on other websites to reflect your interests (but we do not publish interest-based advertisements on our website). You can view, delete or add interest categories associated with your browser by visiting: <https://adssettings.google.com>.

You can also opt out of the AdSense partner network cookie using those settings or using the Network Advertising Initiative's multi-cookie opt-out mechanism at: <http://optout.networkadvertising.org>.

However, these opt-out mechanisms themselves use cookies, and if you clear the cookies from your browser your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-ins available at: <https://support.google.com/ads/answer/7395996>

11. Managing Cookies

- 11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

- 11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

- 11.3 If you block cookies, you will not be able to use all the features on our website.



12. Our Details

- 12.1 This website is owned and operated by the committee of *Baldoyle District Badminton Club*
- 12.2 We are registered with Badminton Ireland, under Leinster on behalf of Dublin District Leagues & Cups and are a Sporting Association, as noted in our Memorandum of Association
- 12.3 Our principal place of play/business is at *Baldoyle Badminton Centre, Grange Road, Baldoyle, Dublin 13*
- 12.4 You can contact us:
 - (a) Using our website contact form
 - (b) By email, using the email address published on our website.

13. Data Protection Officer/s

- 13.1 Our data protection officer's contact details are:
John Bruun: **Website Administrator**
Michael Smith: **Club Chairman**

Contact either by:

- (a) Using our website contact form
- (b) By email, using the email address published on our website.

14. Your Consent

- 14.1 Upon the return of Club Nights in each and every year, the 'Club' will ask members to Consent to the use of and us holding their information (**Name, Email, Phone Number, Images**). Furthermore they will be asked to agree to abide by the 'Club Rules' (Rules that Govern Membership of Baldoyle District Badminton Club).

The Form also briefly explains why we need to ask for Consent (General Data Protection Regulations GDPR) and that members must abide by 'Club Rules' as a condition of membership. The form also advises members that the full Privacy Policy Statement & Club Rules are available to view/read in the club cabin.

14.1.1 Method

To minimize the amount of paperwork, we have devised a simple 'Form' that allows a member to Consent to the club holding Members Data & Agreement to abide by the 'Club Rules'. Members only need to tick (☒ Yes), Sign and Date the document, **IF** they Consent & Agree. (See screenshot of 'Form' on the following page)



Baldoyle District Badminton Club



Data Protection:

Under the new General Data Protection Regulations (GDPR), ALL organisations, including sporting clubs, are required to have **Consent** to hold information from the persons affiliated with the organisation/club. You are asked below, to give **Consent**, to Baldoyle District Badminton Club holding/using the following types of information about you:

1) Your Name 2) Your Phone Number 3) Your Email 4) Your Image/s (from social events/matches etc.) A full copy of the Clubs 'Privacy Protection Policy' Document is available to view in the Club Cabin and this will also be emailed to members who have consented.

Club Rules:

Please note, to be a member of Baldoyle District Badminton Club, you must agree to abide by Club Rules. Please indicate your intention below.

A full copy of the Club Rules Document will be available for viewing in the Club Cabin and will also be emailed to members who have consented.

I agree to abide by the 'Club Rules' <u>and</u> Consent to the Club holding the types of information listed above	MEMBER NAME IN BLOCK CAPITALS	MEMBER SIGNATURE	DATE
Consent & Agreement ☒			

[Screenshot of Form to capture Data Consent & Agreement to Abide by Club Rules]

14.1.2 Duration

We will hold this 'Form' on file for a period of 12 months and repeat the process annually.

14.1.3 Withdrawal of Consent (Data Holding) and/or Agreement to Abide by Club Rules

A member who has previously Consented and Agreed to our holding of their Data and Agreement to Abide by Club Rules, may, at any time withdraw that Consent and or Agreement.

However, the member will be advised, that both Data Consent & Abiding by 'Club Rules' are an **irrevocable pre-requisite** of membership and if either/both are withdrawn, the Club will have no choice but to rescind their membership.



15. Declaration

- 15.1 We, the committee of Baldoyle District Badminton Club, have created this Privacy Policy, for the sole purpose of meeting the legal requirements around the use of our Members Data on our website.
- 15.2 We have done so, in good faith and to the best of our abilities.
- 15.3 If errors and omissions are noticed or notified, we will, as a committee, endeavor to rectify as soon as possible within a reasonable given timeframe.
- 15.4 If errors and omissions are noticed or notified, we will, as a committee, update this Privacy Policy as soon as possible within a reasonable given timeframe and notify all members of the revision.

Signed on behalf of the Club Committee:

Michael Smith (Club Chairman)

May 2018