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BALLINCOLLIG RUGBY FOOTBALL CLUB

"One Team, One Club"

Ballincollig Rugby Football Club (RFC)

Data Protection & GDPR Policy

1st May 2025

1. Introduction

Ballincollig RFC is committed to protecting the privacy and personal data of its members, employees, volunteers, supporters, and all other stakeholders. This policy outlines the club's obligations and approach to ensuring compliance with the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), the Irish Data Protection Act 2018, and all other relevant Irish data protection laws and regulations. Ballincollig RFC recognises the importance of maintaining the accuracy, confidentiality, and integrity of personal data.

2. Scope

This policy applies to all personal data processed by Ballincollig RFC, regardless of its format (electronic, paper-based, or other), and regardless of the individual it pertains to, including, but not limited to: members, players (including underage players), coaches, employees, volunteers, committee members, supporters, sponsors, and website users. This policy covers all processing activities, including collection, storage, use, transfer, and deletion of personal data.

3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing:** Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Data Controller:** The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State



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law. Ballinacollig RFC is the Data Controller in respect of the personal data it holds and processes.

- **Data Processor:** A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- **Data Subject:** The individual to whom the personal data relates.
- **GDPR:** The General Data Protection Regulation (Regulation (EU) 2016/679).
- **DPO:** Data Protection Officer.

4. Data Protection Principles

Ballinacollig RFC adheres to the principles relating to the processing of personal data as set out in Article 5 of the GDPR:

- **Lawfulness, Fairness, and Transparency:** Personal data shall be processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- **Purpose Limitation:** Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- **Data Minimisation:** Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy:** Personal data shall be 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.
- **Storage Limitation:** Personal data shall be 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of the data subject.

- **Integrity and Confidentiality:** Personal data shall be 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.
- **Accountability:** The controller shall be responsible for, and be able to demonstrate compliance with the principles.

5. Lawful Basis for Data Processing

Ballinacollig RFC processes personal data based on one of the following lawful bases as outlined in Article 6 of the GDPR:

- **Consent:** The data subject has given explicit consent to the processing of their personal data for one or more specific purposes.
- **Contract:** Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Legal Obligation:** Processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Vital Interests:** Processing is necessary in order to protect the vital interests of the data subject or of another natural person.
- **Public Interest:** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- **Legitimate Interests:** Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Specific examples of processing activities and their lawful basis:

- **Membership Administration (e.g., registration, renewals):** Contract (for members), Legitimate Interests (for the club)
- **Marketing & Communications (e.g., newsletters, event announcements):** Consent (where required), Legitimate Interests
- **Safeguarding (e.g., child protection):** Legal Obligation, Vital Interests
- **Financial Administration (e.g., payment processing):** Contract, Legal Obligation
- **Maintaining a database of members:** Legitimate interest.

- **Use of CCTV (if applicable):** Legitimate Interests.

6. Member and Data Subject Rights

Members and data subjects have the following rights under the GDPR and Irish Data Protection Act 2018:

- **Right of Access (Article 15):** Individuals have the right to obtain confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, access to the personal data and certain related information.
- **Right to Rectification (Article 16):** Individuals have the right to obtain the rectification of inaccurate personal data concerning them without undue delay, and to have incomplete personal data completed.
- **Right to Erasure ('Right to be Forgotten') (Article 17):** Individuals have the right to obtain the erasure of personal data concerning them without undue delay in certain circumstances.
- **Right to Restriction of Processing (Article 18):** Individuals have the right to obtain restriction of processing of their personal data in certain circumstances.
- **Right to Data Portability (Article 20):** Individuals have the right to receive the personal data concerning them, which they have provided to the controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.
- **Right to Object (Article 21):** Individuals have the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them which is based on legitimate interests or the performance of a task carried out in the public interest.
- **Right to Withdraw Consent (Article 7):** Where processing is based on consent, the data subject has the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- **Right to Lodge a Complaint (Article 77):** Individuals have the right to lodge a complaint with the Data Protection Commission (DPC) if they believe that Ballinacollig RFC has infringed their data protection rights.

7. Data Security

Ballinacollig RFC implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk of processing personal data. These measures are designed to protect personal data against unauthorized access, loss, destruction, alteration, or disclosure. These include, but are not limited to:

- **Access Controls:** Implementing strong password policies, limiting access to personal data to authorized personnel only, and using access logs.
- **Data Encryption:** Encrypting personal data both in transit and at rest where appropriate.
- **Data Backups:** Regularly backing up personal data and ensuring that backups are stored securely.
- **Security Audits:** Conducting regular security audits to identify and address vulnerabilities.
- **Staff Training:** Providing regular data protection training to all staff and volunteers who handle personal data, to ensure they understand their obligations under GDPR and this policy.
- **Physical Security:** Implementing appropriate physical security measures to protect against unauthorized access to premises and equipment.
- **Secure disposal:** Ensuring data is securely disposed of when it is no longer required.

8. Data Breach Management

Ballinacollig RFC has established procedures for managing data breaches in accordance with Article 33 and 34 of the GDPR. In the event of a data breach that is likely to result in a risk to the rights and freedoms of natural persons, Ballinacollig RFC will:

- **Assess the Risk:** Promptly assess the nature and severity of the breach, including the type of data involved, the number of individuals affected, and the potential impact on those individuals.
- **Contain the Breach:** Take immediate steps to contain the breach and prevent further unauthorized access or disclosure.
- **Notify the DPC:** Notify the Data Protection Commission (DPC) within 72 hours of becoming aware of the breach, unless the breach is unlikely to result in a risk to the rights and freedoms of natural persons.
- **Notify Affected Individuals:** Notify affected individuals without undue delay if the breach is likely to result in a high risk to their rights and freedoms.

- **Document the Breach:** Document the breach, including the facts relating to the breach, its effects, and the remedial action taken.

9. Data Retention

Ballinacollig RFC will retain personal data for no longer than is necessary for the purposes for which the personal data are processed, taking into account legal and regulatory requirements, and best practices. Specific retention periods will be documented in a separate Data Retention Schedule.

10. Data Transfers

Ballinacollig RFC will not transfer personal data to countries outside the European Economic Area (EEA) unless adequate safeguards are in place, as required by Chapter V of the GDPR. These safeguards may include:

- **Adequacy Decision:** Transferring data to a country that has been deemed by the European Commission to provide an adequate level of protection for personal data.
- **Standard Contractual Clauses:** Using standard contractual clauses approved by the European Commission.
- **Binding Corporate Rules:** Implementing binding corporate rules approved by a data protection authority.

11. Data Protection Officer

Ballinacollig RFC has appointed a Data Protection Officer (DPO) who is responsible for overseeing the club's data protection compliance and providing guidance on data protection matters. The DPO's contact details are:

- Morgan O'Donovan
- Ballinacollig Rugby Football Club
- DPO@BallinacolligRFC.ie
- 086 722 8305

12. Contact Information

For questions or concerns about this policy or data protection practices, please contact the DPO at the details above.

13. Training

Ballinacollig RFC will provide regular data protection training to all employees, volunteers, and committee members who handle personal data.

14. Policy Review and Amendments

This policy will be reviewed annually and updated as necessary to remain compliant with GDPR, the Irish Data Protection Act 2018, and other relevant data protection laws and best practices. Any changes to this policy will be communicated to all relevant stakeholders.

15. Responsibility

All members, employees, volunteers, and committee members of Ballinacollig RFC are responsible for complying with this Data Protection Policy.

16. Data Protection Impact Assessments (DPIAs)

Where Ballinacollig RFC undertakes new processing activities that are likely to result in a high risk to the rights and freedoms of natural persons, the club will carry out a Data Protection Impact Assessment (DPIA) in accordance with Article 35 of the GDPR.

17. Special Category Data

If Ballinacollig RFC processes special category data, it must comply with Article 9 of GDPR.

18. Data Processing Agreements

Where Ballinacollig RFC uses a data processor, the club must enter into a written contract (Data Processing Agreement) with the data processor. The Data Processing Agreement must contain the provisions in Article 28(3) of the GDPR.

Adoption Date: 01/05//2025 **Review Date:** 01/05/2026
