

Erins Own Ladies GAA Club	Policy
	Policy Number: POL-
	Effective Date;
Title: Data Protection Policy	
Prepared by: Daphne O'Neill	Date:
Next Review Date	Date:

1. INTRODUCTION

EO needs to gather and use certain information about individuals.

These include members, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the club's data protection standards and to comply with the law.

Why this policy exists:

This data protection policy ensures EO:

- . Complies with data protection law and follow good practice
- . Protects the rights of staff, members and partners
- . Is open about how it stores and processes individuals' data
- . Protects itself from the risks of a data breach

Data Protection Law:

The General Data Protection Regulation 2016/679 describes how organisations – including EO – must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The General Data Protection Regulation is underpinned by eight important principles.

These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the EU, unless that country or territory also ensures an adequate level of protection.

People, risks and responsibilities:

Policy Scope

This policy applies to:

- . The Head office of EO
- All branches of EO

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All staff and volunteers of EO

All members, contractors, suppliers and other people working on behalf of EO

It applies to all data that the company holds relating to living individuals, even if that information technically falls outside the General Data Protection Regulation 2016/679.

This can include:

- . Names of individuals
- . Postal addresses
- . Email addresses
- . Telephone numbers
- . Bank/Credit Card details
- . plus any other information relating directly or indirectly to individuals

Data Protection risks:

This policy helps to protect EO from some very real data security risks, including:

- . **Breaches of confidentiality** For instance, information being given out inappropriately
- . **Failing to offer choice** For instance, all individuals should be free to choose how the company uses data relating to them
- . **Reputational damage** For instance, the company could suffer if hackers successfully gained access to sensitive data.

Responsibilities:

Everyone who works, volunteers for or with EO has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- . The **Executive Committee** is ultimately responsible for ensuring that EO meets its legal obligations.
- . The **Data Protection Compliance Officer, Daphne O'Neill** is responsible for:
 - . Keeping the board updated about data protection responsibilities, risks and issues.
 - . Reviewing all data protection procedures and related policies, in line with an agreed schedule
 - . Arranging data protection training and advice for the people covered by this policy
 - . Handling data protection questions from members, staff and anyone else covered by this policy.
 - . Dealing with requests from individuals to see the data EO holds about them (also called "Subject Access Requests")

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General Guidelines:

- . The only people able to access data covered by this policy should be those who **need it for their work.**
- . Data **should not be shared informally.** When access to confidential information is required, employees can request it from their line managers.
- . **EO will provide training** to all members, if required, to help them understand their responsibilities when handling data.
- . Executive and members should keep all data secure, by taking sensible precautions and following the guidelines below.
- . In particular, **strong passwords must be used** and they should never be shared.
- . Personal data **should not be disclosed** to unauthorised people, either within the company or externally.
- . Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of.

Data Storage:

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the data controller.

- . When data is **stored on paper** it should be kept in a secure place where unauthorised people cannot see it.
- . These guidelines also apply to data that is usually stored electronically but has been printed out for some reason;
- . When not required, the paper or files should be kept **in a locked drawer or filing cabinet.**
- . Executive and Members should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer.
- . **Data printouts should be shredded** and disposed of securely when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- . Data should be **protected by strong passwords** that are changed regularly and never shared between employees.
- . If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.
- . Data should only be stored on **designated drives and servers** and should only be uploaded to an **approved cloud computing service.**
- . Servers containing personal data should be **sited in a secure location**, away from general office space.
- . Data should be **backed up frequently.** Those backups should be tested regularly, in line with the club's standard backup procedures.
- . Data should **never be saved directly** on laptops or other mobile devices like tablets or smart phones.

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. All servers and computers containing data should be protected by **approved security software and a firewall.**

Data Use:

Personal data is of no value to EO unless the club can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- . when working with personal data, executive and members should ensure **the screens of their computers are always locked** when left unattended.
- . Personal data **should not be shared informally**. In particular, it should never be sent by email, as this form of communication is not secure.
- . Data must be **encrypted before being transferred electronically**.
- . Personal data should **never be transferred outside the European Economic Area**
- . Executive and members **should not save copies of personal data to their own computers**. Always access and update the central copy of any data.

Data Accuracy:

The law requires EO to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort EO should put into ensuring its accuracy.

It is the responsibility of all executives and members who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- . Data will be held in **as few places as necessary**. Members should not create any unnecessary additional data sets.
- . Members should **take every opportunity to ensure data is updated**. For instance, by confirming a member's details when they call.
- . EO will make it **easy for data subjects to update the information** EO holds about them.
- . Data should be **updated as inaccuracies are discovered**. For instance, if a member can no longer be reached on their stored telephone number, it should be removed from the database.

Subject Access Requests:

All individuals who are the subject of personal data held by EO are entitled to:

- . Ask **what information** the club holds about them and why
- . Ask **how to gain access** to it
- . Be informed **how to keep it up to date**
- . Be informed how the club is **meeting its data protection obligations**

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If an individual contacts the club requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the club at erinsownladies.sec@gmail.com or erinsown.cork@lgfaclubs.ie The data controller can supply a standard request form, although individuals do not have to use this.

Individuals cannot be charged to honour a subject access request. The data controller will aim to provide the relevant data within 30 days

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

Disclosing Data for other reasons:

In certain circumstances, the General Data Protection Regulation allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, EO will disclose the requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the Board and from the club's legal advisers where necessary.

Providing Information:

EO aims to ensure that individuals are aware that their data is being processed, and that they understand:

- . How the data is being used
- . How to exercise their rights.

To these ends, the club has a privacy statement, setting out how data relating to individuals is used by the club. This is available on request. **A version of this statement is also available on the club's website.**

Our Data Protection policy applies to the personal data held by us which is protected by the Data Protection Acts 1988 and 2003 and GDPR, 2016. The purpose of this policy is to assist EO to meet its statutory obligations, to explain those obligations to EO members and to inform members and third parties how their data will be treated. The policy applies to all members and third parties insofar as the measures under the policy relate to them. Data will be stored securely so that confidential information is protected in compliance with relevant legislation. This policy sets out the manner in which personal data and sensitive personal data will be protected by EO. This policy relates to the retention, use and dissemination of information relating to members and relevant third parties.

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2. SCOPE

This policy explains what sort of data is collected, why it is collected, for how long it will be stored and with whom it will be shared. As more and more data is generated electronically and as technological advances enable the easy distribution and retention of this data, the challenge of meeting our legal responsibilities has increased. We take our responsibilities under Data Protection law very seriously and wish to put in place safe practices to safeguard individual's personal data. It is also recognised that recording factual information accurately and storing it safely facilitates an evaluation of the information enabling us to make decisions in respect of our company. The efficient handling of data is also essential to ensure that there is consistency and continuity where there are changes of personnel within the club.

Implementation of this Policy takes into account EO's other legal obligations and responsibilities.

3. DEFINITIONS

In order to properly understand the club's obligations, there are some key terms which should be understood by all relevant staff:

Data: means information in a form that can be processed. It includes both automated data (eg electronic data) and manual data. Automated data means any information on computer, or information recorded with the intention that it be processed by computer. Manual data means information kept or recorded as part of a relevant filing system or with the intention that it forms part of a relevant filing system.

Relevant filing system: means any set of information that, while not computerised, is structured by reference to individuals or by reference to criteria relating to individuals, so that specific information relating to a particular individual is readily, quickly and easily accessible.

Personal Data: means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the Data Controller ie the club.

Sensitive Personal Data: refers to Personal Data regarding a person's

- . Racial or ethnic origin, political opinions or religious or philosophical beliefs
- . Membership of a trade union
- . Physical or mental health or condition or sexual life
- . Commission or alleged commission of any offence or any proceedings for an offence committed or alleged to have been committed by the person, the disposal

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of such proceedings or the sentence of any court in such proceedings, criminal convictions or the alleged commission of an offence.

Data Controller: means for the purpose of this policy the board of EO.

4. POLICY OBJECTIVES

- . to ensure that the company complies with the Data Protection Acts.
- . to ensure compliance by the club with the eight rules of data protection as set down by the Data Protection Commissioner based on the Acts (see below).
- . to ensure that the data protection rights of members and third parties are safeguarded.
- . to ensure that the information kept in an individual's records is accurate and secure and conforms to the terms of this policy.

5. DATA PROTECTION PRINCIPLES

The club is a data controller of personal data relating to its members and other third parties. As such the club is obliged to comply with the principles of data protection set out in the Data Protection Acts 1988, 2003 and GDPR which can be summarised as follows:

- . **Obtain and process Sensitive Personal and Personal Data fairly:** Information on members and third parties is generally furnished by the individuals themselves with full and informed consent and compiled during the course of their membership or contact with the club. All such data is treated in accordance with the Data Protection Acts and the terms of this Data Protection Policy. The information will be obtained and processed fairly.
- . **Keep it only for one or more specified and explicit lawful purposes:** The club will inform individuals of the reasons they collect their data and will inform individuals to the uses to which their data will be put. All information is kept with the best interest of the individual in mind at all times.
- . **Process it only in ways compatible with the purposes for which it was given initially:** Data relating to individuals will only be processed in a manner consistent with the purposes for which it was gathered. Information will only be disclosed on a need to know basis, and access to it will be strictly controlled.
- . **Keep Personal Data safe and secure:** Only those with a genuine reason for doing so may gain access to the information. Sensitive Personal Data is securely stored under lock and key in the case of manual records and protected with firewall software and password protection in the case of electronically stored data. Portable devices storing personal data (such as laptops) should be encrypted and password protected before they are removed from the company premises. Confidential information will be stored securely and in relevant circumstances, it will be placed in a separate file which can easily be removed if access to general records is granted to anyone not entitled to see the confidential data.
- . **Keep Personal Data accurate, complete and up to date:** Executive committee, members and third parties should inform the club of any change which the club should make to their personal data and/or sensitive personal data to ensure that the

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individual's data is accurate, complete and up-to-date. Once informed, the club will make all necessary changes to the relevant records. The Executive Committee may delegate such updates/ amendments to another member. However, records must not be altered or destroyed without proper authorisation. If alteration/correction is required, then a note of the fact of such authorisation and the alteration(s) to be made to any original record/documentation should be dated and signed by the person making that change.

- . **Ensure that it is adequate, relevant and not excessive:** Only the necessary amount of information required to provide an adequate service will be gathered and stored.

- . **Retain it no longer than is necessary for the specified purpose or purposes for which it was given:** As a general rule, the information will be kept for the duration of the individual's time in the club. Thereafter, the club will comply with the Data Protection guidelines on storage of Personal Data and Sensitive Personal Data relating to a member or third party. The club may also retain the data relating to an individual for a longer length of time for the purposes of complying with relevant provisions of law and/or defending a claim under relevant legislation and/or contract and/or civil law.

- . **Provide a copy of their personal data to any individual, on request:** Individuals have a right to know what personal data/sensitive personal data is held about them, by whom, and the purpose for which it is held.

6. **MISSION:** We aim to achieve the goals of promotion of respect and responsibility for self, for others and for the greater community while respecting the privacy and data protection rights of members, third parties and others who interact with us. The club wishes to achieve these aims/missions while fully respecting individuals' rights to privacy and rights under the Data Protection Acts.

Section B

The personal data records held by the club may include:

1. **Member Records:**

- A) **Catagories of data:**

These may include:

- Name, address and contact details,
- Original records of application and membership
- Records of Garda vetting (if appropriate)
- Bank account details
- Details of complaints and/or grievances beyond local resolution

- B) **Purposes:**

Member records are kept for the purposes of:

The management and administration of the club business (now and in the future)

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To enable the club to comply with requirements set down by the GAA and any relevant governmental, statutory and/or regulatory departments and/or agencies.

C) **Location and Security:**

In a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Executive and members are required to maintain the confidentiality of any data to which they have access.

2. **Third Party Records:**

A) **Categories of third party data:**

These may include:
 Name, address and contact details, PPS number
 Bank account details
 Details of complaints and/or grievances

B) **Purposes:**

this party records are kept for the purposes of:
 The management and administration of the club business (now and in the future)
 To enable the company to comply with requirements set down by the GAA and any other governmental, statutory and/or regulatory departments and/or agencies.

C) **Location and Security:**

in a secure, locked filing cabinet that only personnel who are authorised to use the data can access. Executive and Members are required to maintain the confidentiality of any data to which they have access.

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Section D:

1. Processing in line with data subject's rights:

Data in the club will be processed in line with the data subjects' rights. Data subject have a right to:

- a) Request access to any data held about them by a data controller
- b) Prevent the processing of their data for direct-marketing purposes
- c) Ask to have inaccurate data amended
- d) Prevent processing that is likely to cause damage or distress to themselves or anyone else.

2. Dealing with a data access request:

Section 3 access request:

Under Section 3 of the Data Protection Acts, an individual has the right to be informed whether the club holds data/information about them and to be given a description of the data together with details of the purposes for which their data is being kept. The individual must make this request in writing and the data controller will accede to the request within 30 days.

The right under Section 3 must be distinguished from the much broader right contained in Section 4, where individuals are entitled to a copy of their data.

Section 4 access request:

Individuals are entitled to a copy of their personal data on written request.

- . The individual is entitled to a copy of their personal data (subject to some exemptions and prohibitions set down in section 5 of the Data Protection Act)
- . request must be responded to within 40 days
- . No personal data can be supplied relating to another individual unless that third party has consented to the disclosure of their data to the applicant. Data will be carefully redacted to omit references to any other individual and only where it has not been possible to redact the data to ensure that the third party is not identifiable would the club refuse to furnish the data to the applicant.

3. Providing information over the phone:

In our club, any employee dealing with telephone enquiries should be careful about disclosing any personal information held by the club over the phone. In particular the member should:

- . Check the identity of the caller to ensure that information is only given to a person who is entitled to that information.

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- . suggest that the caller put their request in writing if the member is not sure about the identity of the caller and in circumstances where the identity of the caller cannot be verified.

- . Refer the request to the Executive Committee for assistance in difficulty situations. No member should feel forced into disclosing personal information.

4. Ratification and Communication:

This policy has been ratified by the Executive Committee and is the clubs' agreed data protection policy. Members are familiar with the policy and it has been circulated within the club. Members will be made aware of any changes in the way the club records information on members and others in the club environment.

5. Implementation, Monitoring and Review of the Policy:

This policy will apply from the _____ day of May 2018 and thereafter and will be monitored by the Executive Committee. It will be reviewed as appropriate and any amendments circulated accordingly.

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Appendix 1 – Compliance with the Eight Rules of Data Protection

1. Obtain and process information fairly

- . procedures are in place to ensure that members and third parties are made dully aware when they provide personal information of the identity of the persons who are collecting it, the purpose in collecting the data, the persons or catagories of persons to whom the data may be disclosed and any other information which is necessary so that processing may be fair.
- . Personal information is processed fairly in accordance with the Data Protection Acts, with consent being obtained from members or third parties where required.
- . Sensitive personal information is processed fairly in accordance with the Data Protection Acts, with explicit consent being obtained from members and third parties where required.

2. Keep if only for one or more specified, explicit and lawful purposes:

- . Persons whose data is collected know the reason why it is collected and kept and the purpose for which the data is collected
- . Club management is aware of the different sets of data which are kept and the specific purpose of each.

3. Use and disclose it only in ways compatible with these purposes:

- . Data is used only in ways consistent with the purpose(s) for which it was obtained and is only disclosed in ways consistent with that purpose.
- . there is a procedure in place, which is in accordance with the Data Protection Acts facilitate the transfer of personal data abroad.

Exceptions to disclosure rule:

- . Data can be disclosed when required by law
- . Data can generally be disclosed to an individual himself/herself or with his/her consent.

4. Keep it safe and secure:

Security measures are to be taken against unauthorised access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction.

- . Access to the information (including authority to add/amend/delete records) is restricted to authorised members on a “need to know” basis.
- . The Executive Committee has access to what information is based on this “need to know” policy.

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- . Computer systems are password protected.
- . Information on computer screens and manual files are kept out of view of callers to the club office.
- . Back-up procedures are in operation for computer held data, including off-site back-up.
- . All reasonable measures are taken to ensure that members are made aware of security measures and comply with them.
- . All waste papers, printouts etc are disposed of carefully
- . All steps are taken to ensure that no unauthorised person can access data from computers which are no longer in use or subject to change of use.
- . There is a designated person responsible for security
- . There are periodic reviews of the measures and practices in place.
- . Premises are secure when unoccupied.
- . Where required there is a contract in place with a data processor which imposes an equivalent security obligation on the data processor.

5. Keep it accurate, complete and up-to-date

- . Clerical and computer procedures are adequate to ensure high levels of data accuracy.
- . Appropriate procedures are in place, including periodic review and audit, to ensure that each data item is kept up-to-date.

6. Ensure that it is adequate, relevant and not excessive:

- . Information held is adequate in relation to the purpose(s) for which it is kept
- . Information held is relevant in relation to the purpose(s) for which it is kept
- . The information that is held is not excessive in relation to the purpose(s) for which it is kept.

7. Retain it for no longer than is necessary for the purpose or purposes:

- . Unless where litigation arises (eg in relation to accidents/personal injuries involving staff or accidents occurring on company property), personal data is held for a period of one year after the departure of a member.

8. Give a copy of his/her personal data to that individual on written request and photo identification

An individual on whom the club keeps personal data is entitled to:

- . a copy of the data which is kept about him/her.
- . know the purpose(s) for processing his/her data.
- . know the identity of those to whom the data is disclosed
- . know the source of the data, unless it is contrary to public interest.
- . know the logic involved in automated decisions

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- . a copy of any data held in the form of opinions, except where such opinions were given in confidence

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Appendix 2 – Data Access Requests:

To make a request, an individual must:

- . apply in writing
- . provide photo identification
- . give any details which might be needed to help identify him/her and locate all the information you may keep about him/her

Handling access requests:

- . There is a named person responsible for handling access requests.
- . There is a procedure in place to provide applicants with access to personal data about themselves in accordance with the Data Protection Acts as detailed above.
- . On production of a written request and photo identification access will be granted to personal data
- . A clearly co-ordinated procedure is in place to ensure that all relevant manual files and computers are checked for the data in respect of which the access request is made
- . there is a procedure in place to rectify or erase any inaccurate information as identified by the individual on whom the data is kept, within 40 days of the request being made
- . information is supplied promptly and in a form which is clear to the ordinary person

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Appendix 3 procedural rules for Data Access Requests

- . An individual is entitled, by law, to be told what information an organisation holds about them, and to be provided with copies of the same. Members and third parties can request a copy of information stored about them in the company. This is called a Data Access Request (DAR)
- . The company has 30 days to comply with the DAR. There are legal implications for non-compliance
- . All DAR requests must go, initially, via the Executive Committee. These should be considered “high priority”
- . upon receipt of an access request, the company is entitled to proof of identity from the requester
- . The Executive Committee will put together the Information Gathering Team responsible for collating the required information, and assign tasks.
- . Data on individuals may be stored in a variety of different locations, including but not limited to: Vsware, Filing Cabinets (paper based). Different members will have access to these varied sources and these must be part of the Information Gathering Team. It is the responsibility of these members to action the data retrieval from their allocated company systems, and to keep a note of all steps taken to find and retrieve all the personal data, in case of any subsequent investigation
- . By day 25 after the DAR, at the latest, the Information Gathering Team should meet and collate all of the relevant information, and prepare it for handover.
- . the requester should be supplied with a copy of their personal data in permanent form. This should be a hard-copy printout with any third party information redacted. A copy of all information should be made and retained by the club.
- . The information should be handed directly to the individual by the Executive Committee or designate. If this is not possible it should be posted using registered post.

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Appendix 4 Club Records Retention Schedule

The club as data controller must be clear about the length of time for which personal data will be kept and the reasons why the information is being retained. In determining the appropriate retention periods, regard must be had for any statutory obligations imposed on a data controller. If the purpose for which the information was obtained has ceased and the personal information is no longer required, the data must be deleted or disposed of in a secure manner. It may also be anonymised to remove any personal data. Anonymization must be irrevocable; removing names and address may not necessarily be sufficient.

In order to comply with this legal require, the club has assigned specific responsibility and introduced procedures for ensuring that files are purged regularly and securely and that personal data is not retained for any longer than is necessary. All records will be periodically reviewed in light of experience and any legal or other relevant indications.

The table below is for indicative purposes only and may not contain an exhaustive list of data retained by the company.

Members	Retention Period	Final Disposition	Comments
Name, address, phone number, medical conditions, childrens details (for Juvenile members)	Duration of membership and years thereafter	Confidential shredding. Retain anonymised sample for archival purposes	
Accident/injury at reports	Duration of membership plus 7 years	Confidential shredding or do not destroy	Do not destroy if sustained in relation to or in connection with the individual's duties within the company