

EMERALD WARRIORS RFC DATA PROTECTION NOTICE



PURPOSE AND SCOPE OF NOTICE

This notice is to inform you of our policy about all information that we, Emerald Warriors RFC, record and process about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("Personal Data") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.

We respect and value your privacy. That is why we have set out in this Data Protection Notice how and why Personal Data relating to you will be collected and processed by Emerald Warriors RFC and/or on our behalf by our third-party service providers.

Please review the sections of this Notice which are relevant to you based on your interactions with Emerald Warriors RFC.

For the purposes of this notice, the controller of your Personal Data is Sarah Gallagher, Hon Secretary Emerald Warriors RFC, c/o St Marys RFC, Templeogue, Dublin 6W

PROCESSING YOUR PERSONAL DATA WHEN YOU ARE INVOLVED WITH EMERALD WARRIORS RFC (E.G. REGISTERED CLUB PLAYER, VOLUNTEER, COACH, COMMITTEE MEMBER)

There are many ways in which you can become involved with Emerald Warriors RFC. This could be when you play, volunteer or coach with us; when you attend one of our events or when you enquire about how you can contribute to or collaborate with Emerald Warriors RFC.

WHAT PERSONAL DATA WE COLLECT AND PROCESS WHEN YOU ARE INVOLVED WITH EMERALD WARRIORS RFC

We may collect and process the following Personal Data about you which we obtain either directly from you:

- **Individual Details:** This includes general Personal Data about who you are, such as your name, address, contact details, and date of birth.
- **Query Information:** You may choose to give us information such as your name, address, e-mail address, telephone number and other details when you contact us regarding club membership, either directly or via our Website.
- **Club Registration Information:** Individuals who play rugby with a recognised club must be registered with Leinster Rugby. We use the IRFU Clubhouse system for purposes of club administration and to register and manage players. Clubhouse accounts will also be created for coaches and volunteers. Personal Data processed through Clubhouse can include your name, address, gender, date of birth, nationality, your image, your next of kin and your contact details.

We may obtain Personal Data about you from the following third parties:

- **Social Media Information:** We may receive information about you from social media platforms, such as Facebook, Twitter, LinkedIn and Instagram, when you interact with us via such platforms. This includes information which you provide to us or otherwise make available via such platforms.
- **Event Organisers:** We may engage the services of third parties to assist us in running and operating events. When you attend or express an interest in such an event we may be provided with your Personal Data.

We may collect and process the following special category of Personal Data about you which we may obtain directly from you:

- **Health:** Information relating to any injuries you receive while playing or training. This information will be forwarded to the IRFU as part of the tracking process around injuries.

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We will from time to time contact you to

- Notify you about matches and other Club events
- Provide you with information about club meetings including but not limited to the Annual General Meeting
- Conduct surveys, which you can opt-out of
- Better understand where we can make improvements
- Forward information from trusted third parties that we believe may be of interest to you
- Notify you of changes to this or another Data Protection Notice or any terms and conditions to which you may be a party
- To process and respond to any queries, requests and complaints you may submit to us.

SHARING AND DISCLOSURE OF YOUR PERSONAL DATA

Clubhouse

We will disclose your personal data to Leinster Branch and the IRFU for the purposes of

- Registering you as a player or volunteer with the club
- Maintaining your registration within the database of registered players

We will only disclose your personal information to third parties outside Leinster Rugby in the following circumstances:

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 Emerald Warriors RFC is subject

- To protect the rights, property or safety of Emerald Warriors RFC or others
- To enforce or apply the Terms and other agreements or to investigate potential breaches
- We will from time to time send an up to date list of current members (names only) to our sponsorship partner, The George, in order to facilitate free entry as per our sponsorship agreement

Teams, competition organisers and international rugby organisations

- To facilitate communication regarding scheduling of training and matches and recording match statistics we share your Personal Data (name, mobile number and email address) with TeamSnap (<https://www.teamsnap.com/privacy-policy>)
- To facilitate communication with all club members there is a Club WhatsApp group (<https://www.whatsapp.com/legal/#privacy-policy>). You may remove yourself from this group at any stage
- To facilitate rugby games and competitions at a national and international level. This includes the organisers of the Bingham Cup and the Union Cup.

THIRD PARTY SITES

Our website may, from time to time, contain links to and from the websites of our Members, partner networks, advertisers, event organisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

DATA RETENTION

In accordance with our policy on data retention we shall keep your Personal Data which we process based on your involvement with Emerald Warriors RFC for a period after your engagement with Emerald Warriors which depends on why you have interacted with us. Please contact dataprotection@ewrfc.ie for further information about our retention periods.

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Please note that in certain circumstances, we may hold your Personal Data for a longer period, for example, if we are processing an ongoing claim or 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.

LEGAL BASIS

The following details the legal bases under which (“Legal Basis”) and the reasons why (“Purposes”) we collect, obtain and process your Personal Data:

- **Contract**
 - It is necessary to process this Personal Data to enter into and perform our contract(s) with you.
- **Legitimate Interests**
 - It is in our legitimate interests to collect and process your Personal Data for a range of operational, business and organisational purposes.
 - 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.
- **Business and Operational**
 - To conduct administrative and operational processes within the Club and our associated organisations
 - To develop and maintain our relationship with you or your organisation
 - To invite you to and host you at our events and meetings
- **Communication**
 - To process and respond to any enquiries, requests and complaints you may submit to us.
- **Compliance with a Legal Obligation**

We may process your Personal Data where it is necessary 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
 - To comply with our obligations under the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012-2016.
- **To Defend, Establish or be a Party to Legal Claims**

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

 - To file legal proceedings
 - To investigate, establish, exercise or defend a legal claim

STORING OF AND TRANSFERS 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 Personal Data. Where we transfer Personal Data to a third country, we may do so based on Standard Contractual Clauses which are a form of data processing contract approved by the European Commission. You can find a copy of these clauses [here](#).

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If you would like to find out more about the appropriate safeguards that we have in place to govern the transfer of your Personal Data you can contact us at dataprotection@ewrfc.ie.

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

This section sets out the rights which you have to address any concerns or queries with us about our processing of your Personal Data.

(Note that in certain circumstances, these rights may not be absolute)

Right of Access

- You have the right to request a copy of the Personal Data held by us about you and to access the following information in relation to the processing of your Personal Data:
 - the purposes of processing
 - the categories of Personal Data concerned
 - the recipients of your Personal Data
 - the period for which your Personal Data will be stored
 - the existence of your right to lodge a complaint with the Data Protection Commission
 - the source of your Personal Data
- We will only charge you for making an access request where we feel your request is unjustified or excessive.

Right to Rectification

- You have the right to request that we amend any inaccurate Personal Data that we have about you.

Right to Erasure

- You have the right to ask us to erase your Personal Data where:
 - it is no longer necessary to perform our contract with you;
 - you withdraw your consent and there is no other legal basis permitting us to process your Personal Data;
 - you object and we have no overriding legitimate interest;
 - your Personal Data has been unlawfully processed; or
 - it must be erased to comply with a legal obligation.

Please note that erasure may not be complete or immediate to the extent that some of your Personal Data is necessary for the purpose for which it was collected.

The right to restriction of processing

- You have the right to ask us to restrict processing your Personal Data in the following situations:
 - where you contest the accuracy of your Personal Data
 - where the processing is unlawful and you do not want us to delete your Personal Data
 - where we no longer need your Personal Data for the purposes of processing, but you require the data in relation to a legal claim
 - where you have objected to us processing your Personal Data pending verification as to whether or not our legitimate interests override your interests or in connection with legal proceedings.

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When you exercise this right we may only store your Personal Data and may not further process it unless you consent or the processing is necessary in relation to a legal claim or to protect the rights of another person or legal person or for reasons of important public interest.

Right to data portability

- You may request us to provide you with your Personal Data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your Personal Data directly to another data controller where this is technically feasible
- This right only arises where:
 - we process your Personal Data with your consent or where it is necessary to perform our contract with you;
 - the processing is carried out by automated means.

Right to Object

- You have a right to object at any time to our processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests.
- You can exercise any of these rights by submitting a request to our Data Protection Executive dataprotection@ewrfc.ie

We will provide you with information on any action taken upon your request in relation to any of these rights without undue delay and at the latest within one month of receiving your request. We may extend this timeframe by one more month if necessary having regard to the circumstances of the request. However, we will inform you if this arises.

QUESTIONS AND COMPLAINTS

If you have any concerns about the way your Personal Data are being used or processed by Emerald Warriors RFC, please contact dataprotection@ewrfc.ie.

If you have any concern in relation to how your Personal Data is used or processed, you have the right to lodge a complaint with your national data protection regulator. For further information and to find your national data protection regulator, please see [here](#).

CHANGES TO THE NOTICE

If we amend this notice, in whole or part, at our sole discretion, any changes will be effective immediately upon communicating the revised notice to you.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you and you will have a choice as to whether or not we use your information in the new manner.

WEBSITE PRIVACY NOTICE

Introduction

1. This is a notice to inform you of our policy about all information that we record about you through our website www.ewrfc.ie. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.
2. www.ewrfc.ie is the website for the Emerald Warriors RFC. The Club can be contacted at c/o St Mary’s RFC, Templeogue, Dublin 6W, Ireland.
3. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
4. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.
5. We undertake to preserve the confidentiality of all information you provide to us and hope that you reciprocate.
6. Our policy complies with Ireland law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
7. The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org
8. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

The bases on which we process information about you

- The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.
- If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.
- If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

1. Information we process because we have a contractual obligation with you

- When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.
- In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes
- sell products to you
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website
- We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.
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- Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.
- We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

2. Information we process with your consent

- Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our Club, our products and services, you provide your consent to us to process information that may be personal information.
- Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.
- Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.
- Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.
- If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.
- We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.
- You may withdraw your consent at any time by instructing us dataprotection@ewrfc.ie. However, if you do so, you may not be able to use our website or our services further.

3. Information we process for the purposes of legitimate interests

- We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.
 - Where we process your information on this basis, we do after having considered:
 - whether the same objective could be achieved through other means
 - whether processing (or not processing) might cause you harm
 - whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so
 - For example, we may process your data on this basis for the purposes of:
 - record-keeping for the proper and necessary administration of our Club
 - responding to unsolicited communication from you to which we believe you would expect a response
 - protecting and asserting the legal rights of any party
 - insuring against or obtaining professional advice that is required to manage EWRFC risk
 - protecting your interests where we believe we have a duty to do so.

4. Information we process because we have a legal obligation

- We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.
- For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.
- This may include your personal information.

Specific uses of information you provide to us

5. Information provided on the understanding that it will be shared with a third party

- Our website may allow you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- posting a message our forum
- tagging an image
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks
- In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.
- We do not specifically use this information except to allow it to be displayed or shared.
- We do store it, and we reserve a right to use it in the future in any way we decide.
- Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.
- Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at dataprotection@ewrfc.ie

6. [Complaints regarding content on our website](#)

- If you complain about any of the content on our website, we shall investigate your complaint.
- If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.
- Free speech is a fundamental right, so we must make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.
- If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

7. [Information relating to your method of payment](#)

- Payment information is never taken by us or transferred to us either through our website or otherwise. Our club executives and contractors never have access to it.
- At the point of payment, you are transferred to a secure page on the website of Paypal, Kukri or some other reputable payment service provider. That page may be branded to look like a page on our website, but it is not controlled by us.

8. [Sending a message to our support team](#)

- When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.
- We record your request and our reply in order to increase the efficiency of our Club.
- We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

9. [Complaining](#)

- When we receive a complaint, we record all the information you have given to us.
- We use that information to resolve your complaint.
- If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.
- We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

[Use of information we collect through automated systems when you visit our website](#)

[Disclosure and sharing of your information](#)

10. [Information we obtain from third parties](#)

- Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.
- No such information is personally identifiable to you.

11. [Third party advertising on our website](#)

- Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.
- They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.
- We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

12. [Data may be processed outside the European Union](#)

- Our website is hosted by Media Temple in Culver City, USA
- We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.
- Accordingly data obtained within Ireland or any other country could be processed outside the European Union.
- For example, some of the software our website uses may have been developed in the United States of America or in Australia.

[Access to your own information](#)

13. [Access to your personal information](#)

- At any time you may review or update personally identifiable information that we hold about you, by emailing dataprotection@ewrfc.ie.
- To obtain a copy of any information that is not provided on our website you may send us a request at dataprotection@ewrfc.ie
- After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

14. [Removal of your information](#)

- If you wish us to remove personally identifiable information from our website, you may contact us at dataprotection@ewrfc.ie
- This may limit the service we can provide to you.

15. [Verification of your information](#)

- When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

[Other matters](#)

16. [Use of site by children](#)

- We do not sell products or provide services for purchase by children, nor do we market to children.
- If you are under 18, you may use our website only with consent from a parent or guardian
- We collect data about all users of and visitors to these areas regardless of age, and we anticipate that some of those users and visitors may be children.
- Such child users and visitors will inevitably visit other parts of the site and will be subject to whatever on-site marketing they find, wherever they visit.

17. [Encryption of data sent between us](#)

- We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.
- Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

18. [How you can complain](#)

- If you are not happy with our privacy policy or if have any complaint then you should tell us by email. Our address is dataprotection@ewrfc.ie

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- If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Data Protection Commissioner. This can be done at <https://www.dataprotection.ie/docs/complaints/1592.htm>

19. Retention period for personal data

- Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:
 - to provide you with the services you have requested;
 - to comply with other law, including for the period demanded by our tax authorities;
 - to support a claim or defence in court.

20. Compliance with the law

- Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.
- However, ultimately it is your choice as to whether you wish to use our website.

21. Review of this privacy policy

- We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.
- If you have any question regarding our privacy policy, please contact us dataprotection@ewrfc.ie .