Old Wesley RFC Data Protection Notice

1. PURPOSE AND SCOPE OF NOTICE

We at Old Wesley RFC ("OW") will often have reason to process information ("Personal Data") of those who interact with us directly and others who are involved in the game at various levels ("you" or "your"). We respect and value your privacy. That is why we have set out in this Data Protection Notice (this "Notice") how and why Personal Data relating to you will be collected and processed by OW 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 OW:

- When you are involved with OW (see Section 1.1);
- for purchase, subscription and marketing purposes (see Section 1.2); and
- when you visit www.oldwesley.ie (our "Website") (see Section 1.3).

For the purposes of this notice, the controller of your Personal Data is OW of Donnybrook, Dublin 4, Ireland.

1.1 Processing your personal data when you are involved with OW (e.g. registered club player, non playing member, volunteer, coach or committee member)

1.1.1 How we process your Personal Data when you are involved with OW

There are many ways in which you can become involved with OW. This could be when you play, volunteer or coach with the rugby club; when you attend one of our events; or when you or your organisation enquire about how you can contribute to or collaborate with OW.

1.1.2 What Personal Data we process when you are involved with OW

We may collect and process the following Personal Data about you, which we may obtain either directly from you or from the third parties listed in Section 1.1.6:

Individual Details: This may include general Personal Data about who you are, such as your name, address, contact details, gender, date of birth and occupation.

Hospitality Information: This may include any dietary preferences or requirements you have, or any mobility assistance you may require.

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 or a body with which we are affiliated.

Club Registration Information: Individuals who play rugby with the club must be registered with OW. OW use Smartclub and the IRFU Clubhouse system for purposes of club administration and to register and manage players. Smartclub accounts may also be created for coaches and volunteers and non playing members. Personal Data processed through Smartclub can include your name, address, gender, date of birth, nationality, your image, your next of kin and your contact details.

Device Information: When logging-on to any of the Wi-Fi services we offer at our offices, grounds or events, we may collect information about your device such as the IP address, hardware model, operating system and version, software and file names and versions, preferred language, unique device identifier, advertising identifiers, serial number, device motion information and mobile network information.

We may collect and process the following special category of Personal Data about you which we may obtain either directly from you or from the third parties listed in Section 1.1.6:

Health: This may include any information relating to any injuries you receive while playing rugby at any level, general fitness information, information on any pre-existing medical conditions you may have, information obtained in the course of conducting our anti-doping measures and information on any disability or mobility requirements you may have.

We may also collect and process the following Personal Data relating to criminal convictions and offences, which we may obtain either directly from you or from the third parties listed in Section 1.1.6:

Criminal: This may include information relating to any criminal convictions you may have or cases pending against you which you are obliged to legally disclose to us in the course of completing the Garda Vetting process if you are assuming any role of responsibility with OW in relation to persons aged under 18. It may also include information obtained in the course of conducting our anti-doping measures or obtained as result of any disciplinary matter to which you are a party.

We shall only ever process this special category Personal Data or data relating to criminal convictions on the basis of your (or where you are under 18, your parent's) explicit consent or where such processing is necessary for the establishment, exercise or defence of legal claims or on the basis of reasons of substantial public interest in accordance with applicable law.

1.1.3 Legal Basis

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

Legal Basis	Purpose(s)
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.	**Administration of Rugby** Tracking statistics and performance details across all rugby union matches played in the club; maintaining records of those involved with rugby at all levels, including referees, coaches, volunteers and others engaged in the running of the club, including preparing public facing directories of certain of this information. Preparing handbooks of contact information of committee members and others involved in the administration of rugby at a provincial level. **Clubhouse** To register you as a player, member or volunteer with the club; and to maintain your registration within the database of registered players.

	Business and Operational · To develop and maintain our relationship with you or your organisation; · to invite you to and host you at our events and meetings; and · to conduct administrative and operational processes within OW and our associated organisations. **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 · in particular 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 in order for us to establish, investigate, institute or defend a legal claim to which you are a party.	· To file legal proceedings; and · to investigate, establish, exercise or defend a legal claim.

1.1.4 Sharing and Disclosure of your Personal Data

We will disclose your personal data to the Leinster Branch and the IRFU.

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

Recipient(s)	Purpose(s)
OW subcontractors, service providers and third party partners	· For the purpose of inviting you to and hosting you at events and meetings; and · to allow you access to matches and other events.
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 OW is subject; · to protect the rights, property or safety of OW, our members, or others. This includes exchanging information with other companies and organisations for the purposes of fraud

	protection and credit risk reduction; and · to enforce or apply the Terms and other agreements or to investigate potential breaches.
Teams, competition organisers and rugby organisations	· To facilitate rugby games and competitions at provincial and national level.

1.1.5 Data Retention

In accordance with our policy on data retention we shall keep your Personal Data which we process on the basis of your involvement with OW for a period of time after your engagement with OW which depends on why you have interacted with us. Please contact honsec@oldwesley.ie for further information about our retention periods.

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.

1.1.6 Third Party Sources

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.

If you play, volunteer, are an ordinary member or are otherwise involved with the rugby club we may be provided with your Personal Data in our role as the managing rugby in OW.

Event Organisers: We will often 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 will often be provided with your Personal Data.

Businesses and Organisation: If you work for or are otherwise involved in a business or other organisation (such as a charity, school or voluntary group) that seeks to collaborate with, contribute to or otherwise become involved with OW or one of our affiliated bodies then we may be provided with your Personal Data.

1.2 Processing your personal data for purchase, subscription and marketing purposes

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

We may process your Personal Data in connection with purchase, subscription and marketing purposes whenever you purchase match tickets, merchandise or other products from OW or our authorised sellers; when you subscribe to the OW E-Bulletin; or when you enter a competition with OW or one of our affiliated bodies.

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

We may collect and process the following Personal Data about you, which we may obtain either directly from you or from the third parties listed in Section 1.2.6:

Individual Details: This may include general Personal Data about who you are, such as your name, address, contact details, gender, date of birth and occupation.

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

If you choose to purchase any items from club shop for a third party beneficiary, you need to provide us with information about the beneficiary during the purchase process. In such circumstances, it is your responsibility to make sure the beneficiary or beneficiaries would have no objection to you sharing their Personal Data for the purposes set out in this Notice.

Purchase Information:

- Details of any products, services, events or tickets that you purchase from us.
- Subscription Information
- Information you provide in the course of subscribing to OW E-Bulletin.
- We also collect information in the course of providing you with OW E-Bulletin and any marketing material you subscribe to, or consent to receiving, on the Website.

Device Information: When logging-on to any of the Wi-Fi services we offer at our clubhouse, we may collect information about your device such as the IP address, hardware model, operating system and version, software and file names and versions, preferred language, unique device identifier, advertising identifiers, serial number, device motion information and mobile network information.

1.2.3 Legal Basis

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

Legal Basis	**Purpose(s)**
Contract It is necessary to process this Personal Data to enter into and perform our contract(s) with you. This could be a contract for tickets or products that you purchase from us, for access to our Website, for setting up a customer account or for becoming a member according to the applicable terms, etc.	**Fulfilling your Orders and Requests** · To provide you with information and items that you request from us and to fulfil orders you place with us; · to process your purchases; · to process your subscription; · to personalise products and services we provide you; · to process your payments through our third party payment providers; · to process your purchase of tickets to matches; · to enter you into competitions and contests; · grant access to tickets, products and/or special offers as part of the package of offers provided.

If you do not wish to provide us with your Personal Data for these purposes, we will not be able to enter into or perform our contract(s) with you.	**Customer Account** · To create your online customer account for you; · to process your purchases through this account; and · to otherwise manage and administer your account. **OW E-Bulletin** · To subscribe you to, and send you, OW E-Bulletin **Payment** · To receive payment in exchange for the products, services and tickets you purchase from us; · to refund you any sums that may be owed to you; and · to resolve any issues that may arise if an order is lost, processed incorrectly or otherwise encounters difficulty. **Registered Rugby Player and/or Non Playing Member** · To register you as a rugby union player; · to register you as a non playing member; and · to maintain your registration within the registered player database.
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.	**Marketing** · To send you marketing material provided you have not opted-out of receiving this during the collection of your Personal Data (please note that you may opt-out of receiving such marketing material by contacting us at info@oldwesley.ie or by following the unsubscribe instructions in any marketing communication we send you; and · to keep you updated on news, competitions and events provided you have not objected to receiving this information during the collection of your Personal Data. **Notification and Information** · To notify you about changes to the Website and/or our services; · to notify you of changes to this or another Data Protection Notice or any terms and conditions to which you may be a party; and · to provide you with updates and information such as fixture changes and where and how you can collect tickets.

	Responding to Queries and Complaints · To process and respond to any queries, requests and complaints you may submit to us. **Market Research** · To gain an insight into the preferences and behaviour of our members; · to conduct surveys, which you can opt-out of; · to better understand where we can make improvements; and · to invite you to give feedback and to analyse same.
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.
To Defend, Establish or be a Party to Legal Claims We may process your Personal Data as necessary in order for us to establish, investigate, exercise or defend a legal claim to which you are a party.	· To file legal proceedings; and · to investigate, establish, exercise or defend a legal claim.

1.2.4 Sharing and Disclosure of your Personal Data

We will disclose your Personal Data to other members of the OW community such as the Leinster Branch and the IRFU.

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

Recipient(s)	**Purpose(s)**
OW subcontractors, service providers, ticketing providers and third party partners.	· to assist OW in providing you products and services; · for logistical and IT service purposes; · to send you promotional or direct marketing material (in circumstances where you expressly consented to receiving any such material from third party partners); · to allow for access to matches and other events; and · to send you surveys or polls.

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 OW is subject; · to protect the rights, property or safety of OW, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and · to enforce or apply the Terms and other agreements or to investigate potential breaches.

1.2.5 Data Retention

In accordance with our policy on data retention we shall keep your Personal Data which we process on the basis of your involvement with OW for a period of time after your engagement with OW which depends on why you have interacted with us. Please contact honsec@oldwesley.ie for further information about our retention periods.

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.

1.2.6 Third Party Sources

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.
Marketing Information	We may receive information about you from other third parties where we offer co-branded services or engage in joint-marketing activities.
Ticket Sellers	When you buy match tickets we may be provided with your Personal Data.
Event Organisers	We will often 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 will often be provided with your Personal Data.
Licensees of our Brand	We may receive your Personal Data from licensees of our brand such as retail outlets, sponsors and vendors where you opt-in to receive information from us.
Stadia and Match Venues	We may receive your Personal Data from stadiums and match venues when you attend matches.

1.3 Processing your personal data when you use our Website

1.3.1 How we process your Personal Data when you use our Website

For information about how we collect your Personal Data when you visit our Website, please see our Cookie Policy.

1.3.2 What Personal Data we Process when you visit our Website

We may collect and process the following Personal Data about you when you use our Website:

Technical Information	· When using our Website and availing of services through our Website, we may collect Personal Data about you from you and by using cookies and web analytics technology. This includes information about: · your device type, operating system, browser, IP address and other information derived from cookies used on the Website. Please see our **Cookies Policy** for further information on our use of cookies; and · ·details of your visits to the Website such as traffic data, location data and the resources, advertisements and linked websites that you access through the Website.
Customer Account Information	· This is information that you provide to us when creating a customer account and subsequently using it to make purchases. This information may include your name, date of birth, phone number, email address, billing address, shipping address, phone number and credit card information. · If you choose to purchase an item on the Website shop for a third party beneficiary, you need to provide us with information about the beneficiary during the purchase process. In such circumstances, it is your responsibility to make sure the beneficiary or beneficiaries would have no objection to you sharing their Personal Data for the purposes set out in this Notice.
Payment Information	· This includes your payment card details plus any other information necessary for billing purposes such as your billing address or your bank account information.
Subscription Information	· Information you provide in the course of subscribing to OW E-Bulletin. This information may include your email address, your name, your age range and your address. · We also collect information in the course of providing you with OW E-Bulletin and any marketing material you subscribe to, or consent to receiving, on the Website.

1.3.3 Legal Basis

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

Legal Basis	Purpose(s)
Contract It is necessary to process this Personal Data to enter into and perform our contract(s) with you. This could be a contract for tickets or products that you purchase from us, for access to our Website, for setting up a customer account or for becoming a member according to the applicable terms, etc. If you do not wish to provide us with your Personal Data for these purposes, we will not be able to enter into or perform our contract(s) with you.	**Fulfilling your Orders and Requests** · To provide you with information and items that you request from us and to fulfil orders you place with us; · to process your purchases; · to process your payments through our third party payment providers; · to process your purchase of tickets to matches; · to enter you into competitions and contests; and · to prevent the fraudulent use of gift vouchers. **Customer Account** · To create your online customer account; · to process your purchases through this account; and · to otherwise manage and administer your customer account. **Payment** · To receive payment in exchange for the products, services and tickets you purchase from us; · to refund you any sums that may be owed to you; and · to resolve any issues that may arise if an order is lost, processed incorrectly or otherwise encounters difficulty.
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.	**Improving Website Functionality & Efficiency** · To provide, improve, test and monitor the effectiveness of the Website; · to monitor metrics such as total number of visitors, traffic data and demographic patterns; · to personalise and improve your experience on our digital platforms; and · to ensure the content on the Website is presented in the most effective manner for you and to enhance your use of the Website.

1.3.4 Sharing and Disclosure of your Personal Data

We will disclose your Personal Data to other members of the OW community such as the Leinster Branch and the IRFU

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

Recipient(s)	Purpose(s)
OW subcontractors, service providers and third party partners	· For logistical and IT service purposes**.**
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 OW is subject; · to protect the rights, property or safety of OW, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and · to enforce or apply our website terms and other agreements or to investigate potential breaches.

1.3.5 Data Retention

For information about how long we retain Personal Data collected when you visit our Website for, please see our Cookie Policy. In accordance with our policy on data retention we shall keep your Personal Data which we process on the basis of your involvement with OW for a period of time after your engagement with OW which depends on why you have interacted with us. Please contact honsec@oldwesley.ie for further information about our retention periods.

Please note that in certain circumstances, we may hold your 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 data.

2. IF YOU ARE UNDER 16 OR A PARENT/LEGAL GUARDIAN

If you are under the age of 16, you should always speak to your parent or legal guardian before you send us an email or information, ask us to send you any information, subscribe to our Newsletter, purchase anything from us or provide us Personal Data in any other way. We will need the consent of your parent or legal guardian.

If you are a parent or legal guardian of a child whose Personal Data we are processing, then you may at any time request that we stop processing the Personal Data of your child in so far as we are able, or exercise the rights listed below at Section 4 over your child's Personal Data by emailing us at info@oldwesley.ie. Please note that before we disclose or otherwise process a child's Personal Data on the basis of such a request we may first request that you provide reasonable information about yourself and your child for identification purposes.

3. 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 on the basis of 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**.

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 the club office.

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.

4. 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	Further Information
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: 1) the purposes of processing; 2) the categories of Personal Data concerned; 3) the recipients of your Personal Data; 4) the period for which your Personal Data will be stored; 5) the existence of your right to lodge a complaint with the Data Protection Commission; and 6) 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:
  1) it is no longer necessary to perform our contract with you;
  2) you withdraw your consent and there is no other legal basis permitting us to process your Personal Data;
  3) you object and we have no overriding legitimate interest;
  4) your Personal Data has been unlawfully processed; or
  5) 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.

Right to Restriction of Processing

- You have the right to ask us to restrict processing your Personal Data in the following situations:

  1) where you contest the accuracy of your Personal Data;
  2) where the processing is unlawful and you do not want us to delete your Personal Data;
  3) where we no longer need your Personal Data for the purposes of processing but you require the data in relation to a legal claim; or
  4) 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.

- 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:
  1) we process your Personal Data with your consent or where it is necessary to perform our contract with you; and

		2) 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 whose contact details are set out in Section 5 of this Notice.

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.

5. QUESTIONS AND COMPLAINTS

If you have any concerns about the way your Personal Data are being used or processed by OW, please contact honsec@oldwesley.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 the Data Protection Regulator. For further information and to find the data protection regulator, please see **here.**

6. 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.