**Munster Hockey Privacy Policy**

## 1. Purpose and Scope of Policy

As the body with overall responsibility for the running of hockey in the province of Munster, we at the Munster Branch of Hockey Ireland ("Munster Hockey", "we", "our" and "us") 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 in the province ("you" or "your"). We respect and value your privacy. That is why we have set out in this Privacy Policy how and why personal data relating to you will be collected and processed by Munster Hockey and/or on our behalf by our third-party service providers. For the purposes of this Policy, the controller of your personal data is the Munster Branch of Hockey Ireland Company Limited by Guarantee (CLG) of 1 Lotabeg Estate, Mayfield, Cork, T23 C2P3.

This Privacy Policy applies to the personal data of the following categories of individuals who interact with, or whose personal data is otherwise processed by, Munster Hockey:

(a) members, being individuals registered as members of Munster Hockey or of an affiliated club, whose data we process to administer their membership and participation in hockey activities;

(b) coaches, volunteers, referees and employees, whose data we process to manage their roles, qualifications, and Garda Vetting/safeguarding status;

(c) Board Directors/Branch Officers and Branch Committee Members, whose data we process to manage the governance and day-to-day running of Munster Hockey;

(d) Club Officers, whose data we process to facilitate communication and coordination between Munster Hockey and its affiliated clubs;

(e) registered club players, being players registered with an affiliated club who participate in competitions, fixtures or events organised or administered by Munster Hockey;

(f) personal data received from, or shared with, schools and affiliated clubs, where they act as a source of personal data (for example, in registering players or coaches) or as a recipient of personal data (for example, for fixtures or safeguarding purposes);

(g) spectators and other individuals who may be photographed or recorded at matches, training sessions or events, whose images may be captured and used as described in Section 4 below;

(h) correspondents and website visitors, being individuals who contact us by email or other means, or who interact with our website, including through cookies (see our cookies policy for more details);

(i) subscribers to our mailing list/newsletter

## 2. Processing your Personal Data

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 6:

- Name, address, telephone number and email address, gender and date of birth for the purpose of managing membership of Munster Hockey. In the case of a person Under 18, the name of the parent/guardian;
- Name, address, telephone number and email address for Board Directors/Branch Officers, Branch Committee Members for the purpose of managing the day to day running of Munster Hockey;
- Club Officers' name, telephone number and email address for the purpose of communication with Munster Committees and between clubs registered in Munster;
- Coaches/Volunteers/Referees/Employees name, email address, telephone number and ID where relevant to facilitate Garda Vetting/Safeguarding Status for the protection of children or vulnerable adults within Munster Hockey;
- Coaching, umpiring and officiating qualifications;
- Roles and responsibilities of volunteers;
- Munster Branch appointments; employee recruitment, financial, payroll information, performance records and emergency contacts;
- Training, education and development records;
- Disciplinary related information;
- Club membership information;
- Team, event and competition information;
- Fixtures information;
- Name and email addresses of mailing list subscribers;
- When you visit our website (www.munsterhockey.ie) we collect information to ensure security, understand how you use our services, and improve your experience. Unless you actively provide personal information through our mailing list subscription, we mainly collect technical information about your device and how you use out digital services. See our Cookies Policy for more details.

We may collect and process the following special categories of personal data about you which we may obtain either directly from you or from the third parties listed in Section 6:

In limited circumstances we may process personal data, including health, safeguarding, or criminal offence-related data (such as Garda Vetting disclosures), but only where this is necessary and lawful.

Health data may include information relating to any injuries you receive while playing hockey, general fitness information, information on any pre-existing medical conditions you may have and information on any disability or mobility requirements you may have.

The Garda vetting process is managed through Hockey Ireland's internal vetting procedure. Where we process criminal offence-related data, 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 Munster Hockey or an affiliated club in relation to persons aged under 18. It may also include information obtained as result of any disciplinary matter to which you are a party. We process this data on the basis that this is authorised by law under Section 55 of the Data Protection Act 2018, and we apply suitable and specific measures to safeguard this data, including restricting access, applying retention time limits, and providing relevant training to those involved in its processing.

## 3. Legal Basis

The following table details the legal basis under which ("Legal Basis") and the reasons why ("Purpose") we collect, obtain and process your personal data.

| **Legal Basis** | **Purpose** |
|---|---|
| Legitimate Interests | To organise and administer the day to day running of Munster Hockey activities including club membership |
| Legitimate Interests | To manage player, club coach, umpire official and volunteer participation |
| Legitimate Interests | To organise fixtures, competitions tournaments, training sessions and events |
| Legitimate Interests | To communicate with our members and to respond to enquiries and requests |

| Legal Basis | Purpose |
|---|---|
| Consent | To communicate with subscribers to our mailing list |
| Legitimate Interests | To set up development, coaching, umpiring courses |
| Legitimate Interests | To administer complaints, disciplinary issues and appeals |
| Legitimate Interests | To administer awards |
| Legitimate Interests | To facilitate the administration and coordination of hockey activities between Clubs and Schools in Munster |
| Legitimate Interests | To promote and develop hockey in Munster |
| Legitimate Interests | To publish legitimate hockey related information including fixtures, results and team information |
| Legal Obligation | To file legal proceedings and to investigate, establish, exercise or defend a legal claim |
| Legitimate Interests | To manage the Munster Branch website and digital services |
| Legitimate Interests | To manage our business with service provider MyGameDay |

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.

We will not use personal data for any purpose other than that for which it was collected unless consent is given or it is required by law.

Special Category Personal Data

| Legal Basis | Purpose |
|---|---|
| Explicit Consent | Health data, including health or medical information processed as described above |
| Legal Obligation (Section 55 of the Data Protection Act 2018) | Safeguarding and criminal offence-related data, including Garda Vetting disclosures, as described above |

**4. Images and recordings**

Photographs and Video recordings may be taken at competition matches, training sessions and for promotional purposes subject to consent requirements.

You may withdraw that consent at any time by contacting Colette Coomey, our data protection contact, using the details set out at the end of this Privacy Policy.

**5. Children's Personal Data**

We will use children's personal data only for specified purposes and will take particular care when publishing photographs, videos, names, results or other information relating to children. Where we rely on consent to process a child's personal data, for example for the purposes of Section 31 of the Data Protection Act 2018, a parent or guardian will provide or authorise that consent on behalf of a member who is under 16, consistent with Ireland's digital age of consent of 16 years. A parent or guardian may exercise any of the data protection rights described in this Privacy Policy on behalf of a child they represent by contacting us using the details set out at the end of this Privacy Policy.

**6. How do we collect Personal Data**

- Directly from individual members or from a parent /guardian in the case of a member who is under 16;
- From the members' hockey clubs or from Hockey Ireland;
- Through administration systems such as registrations, forms or emails.

**7. Sharing Personal Data**

We may share personal data where necessary and lawful with

- Hockey Ireland, affiliated hockey clubs and schools where appropriate;
- Competition and event organisers;
- Coaches, team managers, umpires and officials;
- Service providers who provide IT, website, registration, payment processing for ticket sales and communication services.

- Insurance providers;
- Law enforcement authorities where required by law;
- Other third parties outside Munster Hockey, such as medical practitioners, emergency personnel, emergency contacts, and other sporting or community bodies, where we have a legitimate interest in sharing personal data with them, for example to safeguard the welfare of a member or to respond to an emergency.

We take reasonable and appropriate measures to protect personal data, including restricting access to personal data to those who need it for the purposes described in this Privacy Policy, maintaining password protection and secure storage of records, requiring confidentiality obligations of those who handle personal data on our behalf, and applying additional safeguards, such as restricted access and retention time limits, to Garda Vetting, safeguarding, and other sensitive data as described in Section 2 above.

**8. How Long We Keep Your Personal Data**

We keep personal data only for as long as necessary for the purposes set out in this Privacy Policy, or as otherwise required by law. In particular:

- Financial and accounting records are retained for 7 years;
- Coaches' details and their Garda Vetting and Safeguarding records are retained for 3 years, or until the individual is no longer engaged in coaching, whichever occurs first;
- Records relating to an accident report for an adult are retained for 3 years;
- Records relating to an accident report for a child are retained for 3 years after the minor turns 18;
- Records relating to child welfare concern are retained permanently for 3 years after the minor turns 18;
- Other categories of personal data not listed above, including general membership records, disciplinary records, and images and recordings, will be retained only for as long as necessary for the purpose for which they were collected, after which they will be securely deleted or destroyed;
- Communication data for newsletter sign up is retained until you withdraw your consent;
- Contracts of employment are retained for 7 years from the termination of the employment.

**9. International Transfers of Personal Data**

We may transfer your personal data to countries outside the European Economic Area (EEA), including where our service providers or other recipients process or store personal data outside the EEA. When we do so, we will ensure that appropriate safeguards or another permitted transfer mechanism are in place to protect your personal data.

Depending on the destination and recipient, we rely on:

- **Standard Contractual Clauses:** Where applicable, we enter into the European Commission's approved Standard Contractual Clauses (also known as model contract clauses) with each relevant data controller or data processor receiving the personal data, using the clauses appropriate to the parties' respective roles. These clauses provide safeguards for personal data transferred from the EEA, including contractual obligations concerning its collection, use, retention and protection.

- **The EU–US Data Privacy Framework:** For transfers to recipients in the United States, we may rely on the European Commission's adequacy decision for the EU–US Data Privacy Framework where the receiving entity holds an active certification under that Framework and the certification covers the personal data and processing concerned. We will rely on this mechanism only while the adequacy decision and the recipient's relevant certification remain valid.

You may contact us using the details set out at the end of this Privacy Policy to obtain further information about our international transfers and the safeguards we use.

**10. Mailing List**

We maintain a mailing list of subscribers using Mailchimp. You can sign up to this mailing list via our website, through Payzone, or via our newsletter. We will only use your contact details for this purpose in accordance with your preferences, and you can unsubscribe from the mailing list at any time.

**11. Automated Decision-Making**

We do not use your personal data for any automated decision-making or profiling that produces legal effects concerning you or similarly significantly affects you.

**12. Your Data Protection rights Under GDPR**

- To access your personal data;
- To have your personal data corrected or rectified;
- To withdraw your consent, by contacting Colette Coomey using the details set out at the end of this Privacy Policy;
- To have your personal data erased in certain circumstances;
- To restrict the processing of your personal data in certain circumstances;
- To receive your personal data in a portable format, or to have it transferred to another organisation, where applicable;
- To object to the processing of your personal data, including an unconditional right to object to the use of your personal data for direct marketing purposes;
- To have the right to complain to the Data Protection Commission if not satisfied with how we process your personal data.

**15. Complaints**

If you have concerns about how Munster Hockey has handled, your personal data we encourage you to contact us in the first instance so that we can investigate and resolve the issue.

**16. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our activities, technology, legal requirements or Data protection practices.

The latest version will be published on our website.

If you have any questions about this Privacy Policy, or wish to exercise your data protection rights, please contact our designated contact for data protection queries, Colette Coomey, using the details below.

Munster Hockey is not required to appoint a Data Protection Officer under the GDPR. We have designated Colette Coomey as our data protection contact to deal with data protection queries and requests.

Address: 1 Lotabeg Estate, Mayfield, Cork, T23 C2P3, Ireland

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