

WEBSITE PRIVACY POLICY

Introduction

This policy governs the use of the websites listed below which are all operated by St Joseph's Boys AFC and SJB Academy, company number 338866 and with registered address at Pearse Park, Sallynoggin, Co.Dublin.

Websites

www.joeys.ie

www.sjbacademy.ie

St Joseph's Boys AFC and SJB Academy respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we use your personal data when you visit St Joseph's Boys AFC and SJB Academy Websites (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Reference to your personal data in this document will include reference to any personal data relating to your children that you may provide to us.

For the purpose of this document, any reference to 'our website' or 'this website' or 'the website' shall be deemed to be a reference to the relevant St Joseph's Boys AFC and SJB Academy Websites accessed by you.

IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy notice

This privacy notice aims to give you information on how St Joseph's Boys AFC and SJB Academy collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to a newsletter, purchase a product or service or apply to participate on any courses or programmes provided by us.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

St Joseph's Boys AFC and SJB Academy, company number 338866 and with registered address at Pearse Park, Sallynoggin, Co.Dublin is the controller responsible for your personal data ('we', 'us' or 'our' in this privacy notice)

We have appointed a Data point of contact who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise/your legal rights.

Name: Will Clarke

Address: St Joseph's Boys AFC and SJB Academy, Pearse Park, Sallynoggin, Co.Dublin

Email: dpoc@joeys.ie

You have the right to make a complaint at any time to the Data Protection Commissioner's Office (www.dataprotection.ie) being the supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Commissioner's Office so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 25/05/2018

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

THE DATA WE COLLECT ABOUT YOU

Personal Data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes [first name, last name, username or similar identifier, title, date of birth and gender, club membership or affiliation]

Contact Data includes [billing address, delivery address, email address and telephone numbers].

Transaction Data includes [details about payments to and from you and other details of products and services you have purchased from us, courses or summer camps booked and attended].

Technical Data includes [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website].

Marketing and Communications Data includes [your preferences in receiving marketing from us and our third parties and your communication preferences].

Aggregated Data

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Special Categories

”Special categories” of particularly sensitive personal information require higher levels of protection (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations.
- Where it is needed in the public interest, such as for equal opportunities monitoring

In some instances, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

In particular we may request medical or health information in order to ensure you or your child’s safety and suitability when participating in certain St. Joseph’s Boys AFC events. You are not obliged to provide this information but if we are not made aware of any relevant medical issues we will be unable to take appropriate measures to ensure your or your child’s safety.

Criminal convictions

If applying for certain positions which will involve working with children or vulnerable adults such as coaching positions it may be necessary for Garda vetting purposes to collect information about criminal convictions and offences to comply with our legal obligations to safeguard child safety. We will provide you with further information in that regard if it becomes necessary.

Children’s Data

Some of the services offered by St Joseph’s Boys AFC are for children. Therefore, we collect personal data about participating children. For any person [under 18], explicit parental or guardian consent to the provision of such information will be required.

Further information

We may provide you with further specific information about the type of data and purpose of it at the point of data capture.

HOW IS YOUR DATA COLLECTED

We use different methods to collect data from and about you including through:

Direct interactions You may give us your [Identity, Contact and Financial Data] by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you complete the online registration

- Become a member
- apply to enrol for a course, training programme or event;
- enter a competition, promotion or survey; or
- give us some feedback.

Third parties or publicly available sources We may receive personal data about you from various third parties as set out below

FAI affiliated club or a team in which you or your child are a member;

Leagues where registration is required MGL/DDSL/SFAI

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Below you will find the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to your children or special categories of data.

If consent is used as a legal basis for processing your data, you have the right to withdraw consent at any time by contacting dpoc@joeys.ie

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact dpoc@joeys.ie if you require further details.

The lawful basis of processing that we use is as follows:

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting dpoc@joeys.ie

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact dpoc@joeys.ie

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Opting Out

You can ask us to stop sending you marketing messages at any time by clicking the opt out option at any time or contact dpoc@joeys.ie

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a course participation, membership registration or other transactions.

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Internal Third Parties.

Other members of St Joseph's Boys AFC and SJB Academy

External Third Parties

Service providers based in EEA who provide IT and system administration services. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in Ireland who provide consultancy, payroll, banking, legal, insurance and accounting services.

Revenue, governmental agencies, regulators, grant authorities and other authorities acting as processors or joint controllers based in Ireland who require reporting of processing activities in certain circumstances or to whom we are obliged to share information about our organisation and participation in it.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

The Football Association of Ireland and DDSL.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

In order to provide certain services to you including the website, we may need to transfer personal data to locations outside the jurisdiction in which a visitor is viewing the website (the User Jurisdiction) and process personal data outside the User Jurisdiction. If the User Jurisdiction is within the European Economic Area (the EEA) please note that such transfers and processing of personal data may be in locations outside the EEA. Any data sent or uploaded by users may be accessible in jurisdictions outside the User Jurisdiction (including outside the EEA). The level of data protection offered in such jurisdictions may be less than that offered within the User Jurisdiction or (as the case may be) within the EEA.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION - HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting dpoc@joeys.ie
In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review - In the event that St. Joseph's Boys AFC Ltd refuses your request under rights of access, we will provide you with a reason as to why.

All of the above requests will be forwarded on should there be a third party involved as we have indicated in the processing of your personal data. If you wish to exercise any of the rights set out above, please contact dpoc@joeys.ie