

# PRIVACY POLICY

# **Revision History**

Version	Revision Date	Revised by	Section Revised	
1.0	12 <sup>th</sup> June 2019	Board	New Document	
2.0	17 <sup>th</sup> April 2024	Board	1. Removal of word cookie from the title of policy as SSRP have a separate cookie policy. 2. Page 5 - "Keeping in Touch" section adding in the words "and opt out" to second line. 3. Change Sports Co-ordinator to CEO throughout document. 4. Page 6-"What are Cookies & why we use them" section including line referring to SSRP Cookie Policy. 5. Page 7 document review section added.	
3.0	12 <sup>th</sup> June 2024	Board	Page 5 - "Explicit Consent" Legal basis under GDPR to process "Special Category Dat specifically participant health data.	

# **Document Control**

Document Owner: SSRP Board	Document No:	Status: Revision	Date Approved: 12/06/2024			
Security Classification:	Next Review Date:	Version:	Department:			
High/Medium/Low	12/06/2027	V3.0				



#### SLIGO SPORT AND RECREATION PARTNERSHIP PRIVACY POLICY:

At Sligo Sport and Recreation Partnership, we respect your right to privacy. This privacy and cookies policy ('Privacy Policy') aims to outline how any personal data collected from you via our website <a href="https://www.sligosportandrecreation.ie">www.sligosportandrecreation.ie</a> and/or from one of our programmes or initiatives, will be protected, used, stored and processed by us to communicate with you on sport and physical activity in Sligo.

Your privacy is important to us and we are committed to ensuring only solicited and relevant information is received by you.

Outlined below are the different elements of our Privacy Policy which will assist you in understanding our practices and your rights.

## ABOUT SLIGO SPORT AND RECREATION PARTNERSHIP:

Sligo Sport and Recreation Partnership CLG ("Sligo Sport and Recreation Partnership", "SSRP", "our" "we", or "us"), is located at Mayo Sligo Leitrim Education and Training Board Offices, Quay Street, Sligo, Ireland, F91 XH96 (Registered in Ireland - Company Number: 360763).

Sligo Sport and Recreation Partnership is a data controller and hence oversees how personal information is processed and used. As a data controller we provide a privacy policy which sets out in detail what information we hold about you (such as your contact details, address, etc.), how your personal information may be used and the reasons for these uses, together with details of your rights. For more information on Sligo Sport and Recreation Partnership go to <a href="https://www.sligosportandrecreation.ie/about-us/">https://www.sligosportandrecreation.ie/about-us/</a>

# WHAT PERSONAL INFORMATION DO WE COLLECT FROM YOU AND HOW?

We may collect the following information with your consent including:

- Name:
- Contact information (phone number/email address);
- Demographic information;
- Other information relevant to our services may include gender, date of birth, medical conditions, in case
  of emergency contact details and any other information that we consider necessary;

We collect and process the information through various means:

- When you register or provide feedback for a SSRP programme/ initiative through application forms, email, phone or online;
- When you register a query on our website, through social media, by phone or by email, or provide personal information which you complete;
- When you consent to keeping in touch with us through inclusion on our databases;
- When you sign up to our newsletters or updates;



## **INFORMATION SHARED WITH & RECEIVED ABOUT YOU:**

Sligo Sport and Recreation Partnership works closely with a number of third parties (for example, host organisations, coaches and tutors) who deliver sport and physical activity opportunities on behalf of SSRP or who provide business support services to SSRP or funders. It is necessary for us to share your personal information with these third-party providers. Similarly, SSRP may receive personal information from these third-party providers as part of their role in delivering a programme or initiative on behalf of SSRP.

#### WHO WILL WE SHARE YOUR PERSONAL DATA WITH?

**Third Party Providers:** We only share your personal information with third party providers who are delivering programmes and initiatives in collaboration or on behalf of Sligo Sport and Recreation Partnership. This information will only be used for the duration of the programme unless you specify otherwise and opt in to additional opportunities during the activity.

**Service Providers:** Sligo Sport and Recreation Partnership IT services, sub-contractors and business partners for the performance of any contract we enter into with you.

**Analytics & Search Engine Providers:** Analytics and search engine providers that assist us in the improvement and optimisation of the Website;

**Law Enforcement:** Law enforcement or regulatory agencies, or authorised third parties, in response to a verified request relating to a criminal investigation or alleged illegal activity.

**Other:** Other business entities, should we plan to merge with or be acquired by that business entity. Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your data.

#### WHY DO WE USE YOUR DATA?

We may use and share non-personal data we receive or collect from you. You can access Sligo Sport and Recreation Partnership's website and social media platforms to utilise a number of services without providing any personal information to Sligo Sport and Recreation Partnership. In general, Sligo Sport and Recreation Partnership does not collect personal information you when you visit these platforms.

For certain sections of Sligo Sport and Recreation Partnership's website, where users require, seek or sign up to further information, personal information is collected by SSRP in order to reply to specific queries you make. Unless specified by you, your personal information will only be used for the duration that your specific Sligo Sport and Recreation Partnership query is active.

Personal information, for the purposes of this Privacy Statement relates to information outlined above that can identify any individual including name, address, contact details. Sligo Sport and Recreation Partnership may use the above personal data held about you for the following purposes (purposes for which we need your consent are marked \*):

- To carry out obligations arising from any contracts entered between you and us and to provide you with information on sport and physical activity that you request from us;
- To help us identify you and previous engagements you have had with us;
- To manage data collected via our website (for example registrations, evaluations);



- To provide other services requested by you, as described when we collect the data;
- To address any enquiries, correspondence, concerns or complaints you have raised;
- To make suggestions and recommendations to you about other programmes, events, workshops or initiatives that may be of interest to you\*.
- To send you updates and marketing content. \*

## WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR DATA?

There are currently a number of legal basis for Sligo Sport and Recreation Partnership to process your personal data. These include; Contractual Necessity, Unambiguous Consent and Legitimate Interest.

# **Contractual Necessity:**

Contractual Necessity is where we use personal information provided to process the appropriate steps of a contract with you for an activity of Sligo Sport and Recreation Partnership and/or third-party provider. An example of this would be where you register online to take part in a programme offered by Sligo Sport and Recreation Partnership. Sligo Sport and Recreation Partnership will need to process your personal information in order to fulfil the contractual obligation of the programme or to provide support services for that specific programme.

Similarly, Sligo Sport and Recreation Partnership works with a number of different third-party providers to provide sport and physical activity opportunities to the people of Sligo and beyond. It is necessary for us to share your personal information with these third-party providers for the purpose of the programme or initiative you have signed up to take part in.

#### Legitimate Interest:

A further example of where Sligo Sport and Recreation Partnership collects your personal data is where we have a legitimate interest to use your data, provided that proper care is taken in relation to your rights. This would include:

- To ensure that we organise our database efficiently and understand how our stakeholders use our website, social media platforms and engage with our marketing campaigns. This will help us to better ensure we continue to improve our online/offline tools to better cater for all our stakeholders.
- To carry out analysis of your data as this helps us understand our stakeholders better, who they are and how they interact with Sligo Sport and Recreation Partnership.
- To ensure that you know about any changes to the website or the terms of this Privacy Policy.

Where we have a legal basis to use your information without consent, this Privacy Policy fulfils our duty to process personal data fairly and lawfully and in a manner that you would expect given the nature of our relationship with you, by giving you appropriate notice and explanation of the way in which your personal data will be used.

# **Unambiguous Consent:**

Where consent is required for our use of your personal information, you will be required to opt in by ticking the appropriate consent box or otherwise communicating your consent (for example, by email, website sign up, on line registration). Please note, we will only process your personal information for marketing purposes if we have your consent to do so.



# **Explicit Consent (GDPR):**

SSRP may process special category data on programme participants, primarily programme participants' health data. GDPR Article 9(2)(a) allows the processing of special categories of personal data where "the data subject has given explicit consent to the processing of those personal data for one or more specified purposes".

#### **KEEPING IN TOUCH:**

Sligo Sport and Recreation Partnership only provides you with information about programme and initiatives updates if you have given us your consent to do so.

Sligo Sport and Recreation Partnership operates an opt in and opt out policy for marketing updates at the time of registration for a Sligo Sport and Recreation Partnership activity or through the sign-up form on the Sligo Sport and Recreation Partnership website. If you would like to sign up over the phone, a staff member of the Sligo Sport and Recreation Partnership can facilitate this for you. You can unsubscribe to marketing updates at any time by clicking the unsubscribe link at the bottom of any email or by contacting the Sligo Sport and Recreation Partnership office.

Sligo Sport and Recreation Partnership will ask if you would like us to send you these marketing messages by ticking an appropriate opt in box at the relevant activation point. This is through the following sources:

- If you sign up to receive information from the Sligo Sport and Recreation Partnership website sign up form;
- If you submit a request to a member of the Sligo Sport and Recreation Partnership team over the phone;
- If you Email a request to be added to a Sligo Sport and Recreation Partnership newsletter;
- Online registration for a Sligo Sport and Recreation Partnership supported event, programme, workshop or initiative;
- Attendance at a Sligo Sport and Recreation Partnership event, programme, workshop or initiative;

#### LINKING WITH THIRD PARTY SITES

Our site may, from time to time, contain links to and from the websites of our partners and relevant stakeholders. If you follow a link to any of these websites, please note that these websites have their own privacy policies—and they will be a data controller of your personal information. We do not accept any responsibility or liability for these policies and you should check these policies before you submit any personal information to these websites. In addition, if you linked to this Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third-party site and contact its owner or operator if you have any concerns or questions.

#### WHY DO WE RETAIN YOUR DATA AND HOW CAN YOU ACCESS IT?

Sligo Sport and Recreation Partnership does not store your personal data for longer than we need to use it in accordance with this notice. Unless we let you know otherwise (or you request we erase your personal data), we will keep your personal data as long as you wish to remain in contact or to be contacted by Sligo Sport and Recreation Partnership.

#### WHAT ARE YOUR RIGHTS?



For full details of your rights in relation to your personal information, please https://www.dataprotection.ie/en/individuals for full details.

To exercise any of these rights, please submit a request in writing to Co ordinator, Sligo Sport and Recreation Partnership, Mayo Sligo Leitrim ETB Offices, Quay Street, Sligo, Ireland F91 XH96 or email <a href="mailto:info@sligosportandrecreation.ie">info@sligosportandrecreation.ie</a>

The rights mentioned above do not extend to non-personal data.

#### HOW YOU CAN PROTECT YOUR CHILD'S INFORMATION?

Sligo Sport and Recreation Partnership co-ordinates and facilitates many programmes and initiatives for children's sport and physical activity. Sometimes we require personal information to be processed to identify and ensure the safety of the participant in the respective programme or initiative. Outside of these programmes and initiatives, we do not knowingly collect information from children under the age of 18.

If you become aware that your child or any child under your care has provided us with information without your consent, please contact us in writing to CEO, Sligo Sport and Recreation Partnership, Mayo Sligo Leitrim Education and Training Board Offices, Quay Street, Sligo, Ireland F91 XH96 or email <a href="mailto:info@sligosportandrecreation.ie">info@sligosportandrecreation.ie</a>

#### WHAT ARE COOKIES & WHY WE USE THEM?

Sligo Sport and Recreation Partnership's website, <a href="www.sligosportandrecreation.ie">www.sligosportandrecreation.ie</a> uses cookies. These are small text files that identify a user's computer to our server. These help Sligo Sport and Recreation Partnership to gather information about how often pages on the websites are visited and by how many people. Cookies do not identify the individual user, just the computer used. This information is then used by Sligo Sport and Recreation Partnership to monitor access to the website and to develop and improve the service provided to stakeholders accordingly. For more information on the cookies we use please refer to the SSRP Cookie Policy.

## **Irish Data Protection Commissioner:**

Further information on your data privacy rights is available on the website of the Irish Data Protection Commissioner: <a href="www.dataprotection.ie">www.dataprotection.ie</a>

# **Contact details:**

Sligo Sport and Recreation Partnership can be contacted at the address below for queries relating to the Sligo Sport and Recreation Partnership's Privacy Policy:

Chief Executive Officer (CEO), Sligo Sport and Recreation Partnership, Mayo Sligo Leitrim ETB Offices, Quay Street, Sligo, F91 XH96.

Email: info@sligosportandrecreation.ie

# **CHANGES TO THIS POLICY**



Any changes we may make to this Policy in the future will be posted on our site and, where appropriate, notified to you by e-mail. When we change this Policy in a material way, we will update the version date at the bottom of this page. Please check back frequently to see any updates or changes to this Policy and should you object to any alteration, please contact us as set out in the "Contact details" section above. We may update this policy from time to time to take account of any new business activity or to reflect any changes in law or best practice in relation to data protection. We will notify you if we do so.

# **POLICY REVIEW**

This policy will be reviewed every 3 years or in line with any changes to legislation.