



A friendship club for children and adults with special needs.

Dublin South Arch Club Data Protection Policy

Introduction:

The purpose of this document is to provide a concise policy statement regarding the Data Protection obligations of Dublin South Arch Club. This includes obligations in dealing with personal and sensitive personal data, in order to ensure that our club complies with the requirements of the relevant Irish Data Protection legislation.

Rationale:

Dublin South Arch Club must comply with the Data Protection principles set out in the relevant legislation. This policy applies to all personal and sensitive personal data collected, processed and stored by Dublin South Arch Club in relation to its members, volunteers and parents/guardians in the course of its activities. Dublin South Arch Club makes no distinction between the rights of Data Subjects who are members and those who are not. All are treated equally under this policy.

Scope:

The policy covers both personal and sensitive personal data held in relation to data subjects by Dublin South Arch Club. The policy applies equally to personal data held in manual and automated form.

All personal and sensitive personal data will be treated with equal care by Dublin South Arch Club. Both categories will be equally referred to as Personal Data in this policy, unless specifically stated otherwise.

This policy should be read in conjunction with the associated Data Protection Procedures which include Subject Access Request procedure, the Data Retention and Destruction Policy, the Data Retention Periods List and the Data Loss Notification procedure.

Dublin South Arch Club as a Data Controller

In the course of its daily organisational activities, Dublin South Arch Club acquires, processes and stores personal data in relation to:

- Members of Dublin South Arch Club
- Members' parents/guardians

- Service providers engaged in work for the club

In accordance with the Irish Data Protection legislation, this data must be acquired and managed fairly. Not all committee members and volunteers will be expected to be an expert in Data Protection legislation. However, Dublin South Arch Club is committed to ensuring that everyone involved has sufficient awareness of the legislation in order to be able to anticipate and identify a Data Protection issue, should one arise. In such circumstances, all working in the club must ensure that the Data Protection Officer is informed in order that appropriate corrective action is taken.

Due to the nature of the service provided by our club, there is regular and active exchange of personal data between us and our Data Subjects. This is consistent with our obligations under the terms of our contract with our Data Processors.

This policy provides the guidelines for this exchange of information, as well as the procedure to follow in the event that a volunteer or member is unsure whether such data can be disclosed.

In general terms, the members and volunteers should consult with the data Protection Officer to seek clarification.

Third-Party processors

Dublin South Arch Club does not deal with third-party processors

The Data Protection Principles

The following key principles are enshrined in the Irish legislation and are fundamental to the Data Protection policy of Dublin South Arch Club.

In its capacity as Data Controller, Dublin South Arch Club ensures that all data shall:

1. Be obtained and processed fairly and lawfully.

For data to be obtained fairly, the data subject will, at the time the data is being collected, be made aware of:

- The identity of the Data Controller of Dublin South Arch Club
- The purpose for which the data is being collected
- The persons to whom the data may be disclosed by the Data Controller
- Any other information that is necessary so that the processing may be fair.

Dublin South Arch Club will meet this obligation in the following way.

- Where possible, the informed consent of the Data Subject will be sought before their data is processed
- Where it is not possible to seek consent, Dublin South Arch Club will ensure that collection of the data is justified under one of the other lawful processing conditions – legal obligation, contractual necessity, etc.
- Processing of the personal data will be carried out only as part of Dublin South Arch Club's lawful activities and we will safeguard the rights and freedoms of the Data Subject.
- The Data Subject's data will not be disclosed to a third party.
- The storage of photos and videos will be covered by our data retention and destruction policy.

2. Be obtained only for one or more specified, legitimate purposes

Dublin South Arch Club will obtain data for purposes which are specific, lawful and clearly stated. A Data Subject will have the right to question the purposes(s) for which Dublin South Arch Club holds their data, and Dublin South Arch Club will be able to clearly state that purpose or purposes.

3. Not be further processed in a manner incompatible with the specified purpose(s).

Any use of the data by Dublin South Arch Club will be compatible with the purposes for which the data was acquired.

4. *Be kept safe and secure.*

Dublin South Arch Club will employ high standards of security in order to protect the personal data under its care. Appropriate security measures will be taken to protect against unauthorised access to, or alteration, destruction or disclosure of any personal data held by Dublin South Arch Club in its capacity as Data Controller.

Access to and management members and their family records is limited to those members who have appropriate authorisation and access.

5. *Be kept accurate, complete and up-to-date where necessary.*

Dublin South Arch Club will

- Ensure that administrative and IT validation processes are in place to conduct regular assessments of data accuracy
 - Conduct periodic reviews and audits to ensure that relevant data is kept accurate and up-to-date. Dublin South Arch Club conducts audit every year to ensure accuracy; Members contact details and details on next-of-kin are reviewed and updated every two years.
 - Conduct regular assessments in order to establish the need to keep certain Personal Data
6. *Be adequate, relevant and not excessive in relation to the purpose(s) for which the data were collected and processed.*

Dublin South Arch Club will ensure that the data it processes in relation to Data Subjects are relevant to the purposes for which those data are collected. Data which are not relevant to such processing will not be acquired or maintained.

7. *Not be kept for longer than is necessary to satisfy the specified purpose(s) as per Dublin South Arch Club Retention and Destruction policy.*

Dublin South Arch Club has identified an extensive matrix of data categories with reference to the appropriate data retention period for each category. The matrix applies to data in both a manual and automated format.

Once the respective retention period has elapsed, Dublin South Arch Club undertakes to destroy, erase or otherwise put this data beyond use.

8. *Be managed and stored in such a manner that, in the event a Data Subject submits a valid Subject Access Request seeking a copy of their Personal Data, this data can be readily retrieved and provided to them.*

Dublin South Arch Club has implemented a Subject Access Request procedure by which to manage such requests in an efficient and timely manner, within the timelines stipulated in the legislation.

Data Subject Access Requests

As part of the day-to-day operation of the organisation, Dublin South Arch Club's staff engage in active and regular exchanges of information with Data Subjects. Where a formal request is submitted by a Data Subject in relation to the data held by Dublin South Arch Club, such a request gives rise to access rights in favour of the Data Subject.

There are specific time-lines within which Dublin South Arch Club must respond to the Data Subject, depending on the nature and extent of the request. These are outlined in the *Data Protection Procedures* document.

Dublin South Arch Club's staff will ensure that, where necessary, such requests are forwarded to the Data Protection Officer in a timely manner and they are processed as quickly and efficiently as possible, within not more than 40 days from receipt of the request.

Implementation

Failure of Dublin South Arch Club's members to process Personal Data in compliance with this policy may result in disciplinary proceedings.

Definitions

For the avoidance of doubt and for consistency in terminology, the following definitions will apply within this policy.

Data	<p>This includes both automated and manual data.</p> <p>Automated data means data held on computer or stored with the intention that it is processed on computer.</p> <p>Manual data means data that is processed as part of a relevant filing system or which is stored with the intention that it forms part of a relevant filing system.</p>
Personal Data	<p>Information which relates to a living individual, who can be identified either directly from that data or indirectly in conjunction with other data which is likely to come into the legitimate possession of the Data Controller. (If in doubt, [The Company] refers to the definition issued by the Article 29 Working Party and updated from time to time.)</p>
Sensitive Personal Data	<p>A particular category of personal data, relating to Racial or Ethnic Origin, Political Opinions, Religious, ideological or philosophical beliefs, trade union membership, information relating to mental or physical health, information in relation to one's sexual orientation, information in relation to commission of a crime and information relating to conviction for a criminal offence.</p>
Data Controller	<p>A person or entity who either alone or with others, controls the content and use of personal data by determining the purposes and means by which that personal data is processed.</p>

Data Subject	A living individual who is the subject of the personal data i.e. to whom the data relates either directly or indirectly.
Data Processor	A person or entity who processes personal data on behalf of a Data Controller on the basis of a formal, written contract but who is not an employee of the Data controller, processing such data in the course of his/her employment
Data Protection Officer	A person appointed by Dublin South Arch Club to monitor compliance with the appropriate data protection legislation, to deal with subject access requests and to respond to data protection queries from staff members and service recipients
Relevant Filing System	Any set of information in relation to living individuals which is not processed by means of equipment operation automatically (computers) and that is structured either by reference to individuals or by reference to criteria relating to individuals in such a manner that specific information relating to an individual is readily retrievable.