

WEBSITE & FACEBOOK PRIVACY POLICY

Introduction

This policy governs the use of the websites listed below which are all operated by Hodson Bay Celtic FC and with registered address at Canon Greene Park, Ballybay, Kiltoom, Co Roscommon.

Hodson Bay Celtic FC Websites

- www.hodsonbayceltic.com
- <https://www.facebook.com/HodsonBayCelticFC/>

Hodson Bay Celtic FC 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 any of the Hodson Bay Celtic FC 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 Hodson Bay Celtic FC Website accessed by you.

1. **[PURPOSE OF THIS PRIVACY NOTICE]**
2. **[THE DATA WE COLLECT ABOUT YOU]**
3. **[HOW IS YOUR PERSONAL DATA COLLECTED]**
4. **[HOW WE USE YOUR PERSONAL DATA]**
5. **[DISCLOSURES OF YOUR PERSONAL DATA]**
6. **[INTERNATIONAL TRANSFERS]**
7. **[DATA RETENTION]**
8. **[YOUR LEGAL RIGHTS]**

1. IMPORTANT INFORMATION AND WHO WE ARE

1.1. Purpose of this privacy notice

This privacy notice aims to give you information on how Hodson Bay Celtic FC collects and processes your personal data through your use of this website, including any data you may provide through the websites outlined above, purchase club products or apply to participate on any courses or programmes provided by Hodson Bay Celtic or the FAI.

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.

1.2. Controller

Hodson Bay Celtic FC and with registered address at Canon Greene Park, Ballybay, Kiltoom, Co Roscommon is the controller responsible for your personal data (‘we’, ‘us’ or ‘our’ in this privacy notice)

If you have any questions about this privacy notice, please contact the following.

Email: hodsonbayceltic@gmail.com

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 via email to the address outlined above.

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

This version was last updated on 26th June 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.

1.4. **Third-Party Links**

These websites 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.

2. **THE DATA WE COLLECT ABOUT YOU**

2.1. **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:

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

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

2.1.3. Financial Data includes [bank account and payment card details].

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

2.1.5. Profile Data includes [your username, purchases or orders made by you, your interests, preferences, feedback and survey responses].

2.1.6. Usage Data includes [information about how you use our website, products].

2.2. **Aggregated Data**

We also collect, use and share **Aggregated Data**. 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.

2.3. Special Categories

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 Hodson Bay Celtic FC 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.

2.4. 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.

2.5. Children's Data

Some of the services offered by Hodson Bay Celtic FC 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.

2.6. 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.

3. HOW IS YOUR DATA COLLECTED

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

3.1.1. 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:

- 3.1.1.1.** Become a member
- 3.1.1.2.** apply to enrol for a course, training programme or event;
- 3.1.1.3.** make a purchase of club gear
- 3.1.1.4.** give us some feedback.

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

- 3.1.2.1.** FAI affiliated club or team in which you or your child are a member;
- 3.1.2.2.** ADSL, MSL and other affiliated clubs

4. 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:

4.1. Where we need to perform the contract have entered into with you.

4.2. 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.

4.3. Where we need to comply with a legal or regulatory obligation.

Paragraph 5 below set out 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.

5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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 hodsonbayceltic@gmail.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

The lawful basis of processing that we use are as follows

- 5.1. **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 hodsonbayceltic@gmail.com
- 5.2. **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.
- 5.3. **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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you in an Hodson Bay Celtic FC event booked through one of the website and process payment for it.	(a) Identity (b) Contact (c) Special Category (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to properly administer the course, training programme or affiliated event, to recover debts due to us). (c) Consent in respect of special categories of data.
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how members use our services)
To enable you to partake in a prize draw or competition	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests

5.4. 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 hodsonbayceltic@gmail.com.

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.

5.5. Opting Out

You can ask us to stop sending you messages at any time by hodsonbayceltic@gmail.com at any time.

6. 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.

6.1. Internal Third Parties.

Other members of the Hodson Bay Celtic FC

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.

7. 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.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You may;

- 8.1. Request access to your personal data.**
- 8.2. Request correction of your personal data.**
- 8.3. Request erasure of your personal data.**
- 8.4. Object to processing of your personal data.**
- 8.5. Request restriction of processing your personal data.**
- 8.6. Request transfer of your personal data to a third party.**
- 8.7. Right to withdraw consent.**

If you wish to exercise any of the rights set out above, please contact hodsonbayceltic@gmail.com