

Carlow LTC treats the security of your personal data very seriously.

## Privacy Policy

### 1. Data that we collect

Carlow LTC is a Controller of the personal data you the Member (data subject) provide. The following types of personal data are collected from you:

- Personal Data:
  - Name
  - Address
  - Telephone Number
  - Email
  - Date of birth – junior members only
  - Medical information – junior members only
  - Video images on our CCTV system
  - We may also retain records of your queries and correspondence in the event you contact us, e.g. by email.

### 2. Why do we need this data?

We need your personal data in order to provide you with the following services:

- Confirmation that you are a member of the club
- Provide you access to the club facilities
- Communicate with you our members regarding club services and cub events
- Communicate with you our members regarding competitions
- Update you on membership status and renewals
- Provide immediate emergency care in the event of an incident – juniors only
- Contact a doctor in case of emergency – juniors only
- Provide video evidence of any via our security CCTV system to the Gárdai in case of criminal activity or damage to club property

### 3. What we do with your personal data?

Your personal data is stored on the club's membership database and access control system.

Your data will not be transferred to any third-party unless this is required for one of the following reasons:

- In order to enter you in a sporting National Governing Body (NGB) competition such as Tennis Ireland, Squash Ireland, Badminton Ireland. In such cases, the club will always seek your consent first
- Irish law enforcement request, Court order or statutory requirement
- Provision of video evidence via our CCTV system to the Gárdai in case of criminal activity or damage to club property

We do not and never shall sell your personal data to third parties for marketing or advertising purposes.

### 4. How long do we keep your data?

We will keep your personal data while you are a member of the club and for six months thereafter. Should you not renew your membership, we will contact you within this six-month period in order to understand your intention regarding your membership. After six months has elapsed post expiry of your membership of the club, we will remove all personal data from the club database and access system unless there is a justifiable reason to keep some or all of your data. In the case of the latter, we will notify you of same and the reasons for continuing to store your data on the club's systems.

## **5. How do we secure your data?**

Carlow LTC uses a data processor, Wildapricot, to process your personal data relating to your membership of the club. Wildapricot uses Amazon Web Services (AWS) to as a hosting partner to store your data. This solution uses strong industry standards-based security to protect data while in transit and at rest. Wildapricot and AWS are fully GDPR compliant. Only your name is held on our access system to match against a unique but anonymous number printed on your access card; this system is housed in a secure area of the club and is not accessible over the internet.

## **6. What are your rights?**

Under GDPR regulations should you believe that any personal data we hold on you is incorrect or incomplete, you have the ability **to make reasonable requests** to see this information, rectify it or have it deleted, through the use of a **Data Subject Access Request Form**.

In the event that you wish to complain about how we have handled your personal data, please contact our Policy Officer at [governance@carlowltc.com](mailto:governance@carlowltc.com) or in writing at Carlow LTC, Oak Park Road, Carlow. Our Policy Officer will then look into your complaint and work with you to resolve the matter.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact the Data Protection Commissioner [www.dataprotection.ie](http://www.dataprotection.ie) and file a complaint with them.

## **7. What about Cookies?**

We may store some information on your computer in the form of a "cookie". A Cookie will permit us to maintain our service to match your needs, interests and preferences. You have a right to refuse to accept cookies.

A cookie is a small text file that is saved on your computer. Most web sites deliver cookies to provide visitors access to various functions on the website. Cookies can be long-lived or short lived. The long-lived cookie holds information and compares it with information you display when you return. Web sites that recognise you when you return and provide access codes automatically are examples of this. The short-term cookies are known as session cookies. These are stored temporarily during your visit and are not stored in your computer for long and are regularly deleted when you close your computer. Long lasting cookies can be deleted from your computer by you.

You can set your computer to block cookies by setting your browser to reject them. However, you may lose many functions that you at present take for granted. Cookies have become like unseen automatic servants - doing things repeatedly that would otherwise require our deliberate intervention.