Privacy Notice

Rowing Ireland is committed to protecting your personal data. This policy sets out how we use your personal data to help further our work in supporting the sport of rowing across Ireland.

Who We Are, What We Do, and How to Contact Us?

Rowing Ireland is the national governing body (NGB) for the sport of rowing across the island of Ireland. We were founded in Dublin as the Irish Amateur Rowing Union on February 3rd, 1899.

Our goal is to grow strong, well-structured safe rowing clubs that provide the opportunity for achievement and enjoyment of the sport at all levels. We commit to being accountable and transparent so that our member clubs, individual rowers, and volunteers can have full confidence in Rowing Ireland.

How you can contact us

Address: National Rowing Centre, Farran Woods, Ovens, Cork

Telephone: +353 21 743 4044 Email: info@rowingireland.ie

Contact Form: https://www.rowingireland.ie/about-us/contact/

About Our Data Processing

Who do we process data about?

As part of our work supporting the sport of rowing, we must process personal data about the people who help us fulfil our mission. You can click on the link to see what specific types of data we may process about you below:

- Our Employees, Staff & Volunteers (types of data processed)
- Our Member Clubs (types of data processed)
- Individual Rowers (types of data processed)
- International Carding Scheme Rowers (types of data processed)
- Donors & Supporters (types of data processed)
- Individuals who purchase from our store (types of data processed)
- Visitors to our website and social media pages (types of data processed)

Details on our lawful bases for processing can be found in the section – What is our legal basis for processing your personal data?

What types of personal data do we collect about you?

Personal data or personal information is any information about you where you can be identified or be made identifiable. We process many categories of personal data, depending on how you interact with our site, whether you belong to a member club, if you work or volunteer with us, or if you choose to donate to Rowing Ireland. In some cases, we may also need to process "**special categories data**" such as physical and mental health records, biometric data for the purpose of identifying you, and criminal records information for vetting purposes.

Because we offer some youth programmes (those below the age of 18), we may collect information such as the child's name, health information, demographic details we collect about <u>rowers</u> and athletes under the <u>International Carding Scheme</u>. We may also capture photographs of children taken at an event, or sent to us by a parent or guardian.

The most common types of data we collect include the following:

Name and Contact Information	Email address / IP address	Phone number
Rower ID ('Rowing Ireland ID Number')	Demographic details & Identity Documentation (if you are a rower) age, gender, education, safeguarding details, vetting confirmation, email, phone, proof of address, passport and ID documentation, PPS / tax information	Sport performance data (if you are a rower) Photos and videos of you (if you attend events)
Financial information (if you are an athlete under the International Carding Scheme, donate to us, or are an employee)	Information related to physical or mental health (for rowers and ICS participants)	Photos and videos of you (if you attend events)

Depending on how you interact with us, we also collect the following personal data. In some cases, this may include special categories data, which are identified in red:

If you are an athlete of a member club:

- **Contact information** name, email address, phone number, postal / home address, next of kin, emergency contact information.
- **Demographic details** gender, date of birth, education details (if a CV is included, or working with a college/university).
- **Identity documents** passport copies, drivers' license.
- Sport Performance Data and Competition and Training Information membership in rowing clubs, entry into and attendance at events, competitions or workshops delivered by Rowing Ireland or our sport partners; competition rankings and gradings at events, training assessments & performance.
- Club Membership Number

- **Biometric information** Photographs, videos & voice recordings taken by us or others on our behalf (for example, at an event, training, or post-event interview).
- Other information we may collect Correspondence with us shared by you, survey answers, signature, information contained in disciplinary complaints.

If you are an athlete under the International Carding Scheme:

- **Contact information** name, email address, phone number, postal / home address, next of kin, emergency contact information.
- **Demographic details** gender, date of birth, education details (if CV is included, or working with a college / university).
- Financial information bank details.
- Information relating to physical and mental health including medical information about conditions that might affect your performance of rowing activities and data gathered for anti-doping purposes and training.
- Identity documents PPSN, passports (including photos), copies of drivers' license.
- Rowing Ireland ID Number
- Sport Performance Data and Competition and Training Information membership in rowing clubs, entry into and attendance at events, competitions or workshops delivered by Rowing Ireland or our sport partners; competition rankings and gradings at events, training assessments & performance.
- **Biometric information** Photographs, videos & voice recordings taken by us or others on our behalf (for example, at an event or post-event interview).
- Signature

If you register a member club:

- Contact information name, email address, phone number, postal / home address.
- **Demographic details** gender, date of birth.
- **Identity documents** PPSN, passports (including photos), copies of drivers' license (if Garda vetting is required).
- Information about criminal convictions If you are required to complete the vetting process with the National Vetting Bureau of An Garda Síochána, for example if your club includes rowers under the age of 18, or individuals considered vulnerable.

If you work or volunteer for us:

- **Contact information** name, email address, phone number, postal / home address, work address, details of next of kin and emergency contacts.
- **Demographic details** gender, date of birth/age.
- Financial information bank details (for reimbursements).
- Information about criminal convictions if you are required to complete the vetting process with the National Vetting Bureau of An Garda Síochána.
- Information relating to physical and mental health For example, the required disclosure by employees of health information to their managers under the Alcohol & Drug Policy.
- Signature
- Other information we may collect references and other details included in a CV or cover letter.

If you purchase something from our **shop**:

- Contact information name, email address, phone number, postal / home address.
- **Financial information** credit or debit card number (collected from our payment processor, Stripe/Paypal).
- IP addresses and machine identifiers

If you donate or become a long-term financial supporter:

- Contact information name, email address, phone number, postal / home address.
- **Financial information** credit or debit card number (collected from our payment processor, Stripe/Paypal).

If you visit our website, sign up for our newsletter, or contact us:

- Cookies our sites make use of cookies for a variety of purposes, some of which are
 necessary for the operation of our sites and services, and others which provide features
 that are non-essential, including analytics and social media sharing. You can find more
 details (and change your cookie preferences) by going to our cookies popup and
 selecting 'Cookies Settings'.
- **Email address** If you sign up for a promotion or marketing, send us a message via our contact form, contact us on social media, or via email.
- **Contact Information** first and last name If you contact us via our contact form, report an incident on IROW Safe, or include this information in your email.
- IP addresses and machine identifiers

If you follow us or contact us on social media (Twitter, Facebook, Instagram, YouTube):

- Contact information such as name, social media ID, phone number, email address.
- Social media profile photo
- **Demographic details** gender, age, country.
- Your interests If you liked content or a video on Facebook, Instagram, or YouTube, followed our profile page, etc.
- Other details you may share For example, information posted in comments).

Other information we may collect:

- Your photograph or image If you send us a photo of you or if you attend one of our in-person rowing competitions/events.
- **Survey Information** We may collect personal information if you complete a survey. We will provide details on the survey about the specific data we collect.
- Records of your interactions with us such as telephone conversations, emails, and other correspondence.
- **Subscription information** if you subscribe to one of our newsletters.

Why do we need to use your personal data (what are our reasons or purposes for processing)?

To legally process that data, we need a reason – or as the GDPR says, we need to have 'specified, explicit and legitimate purposes' for using your data. Depending on our relationship with you, we process personal data for several reasons including:

- Human resource management for employees and volunteers including email, payroll, criminal records (for legal compliance), and training records.
- **Payments processing** processing payments made as part of a donation, purchase, event registration, project funding, or under the International Carding Scheme.
- **Communication** communicating with and maintaining our relationships with our donors, sponsors, supporters, partner organisations and member clubs, as well as individual rowers. This includes handling queries from rowers and member clubs.
- Administering events and competitions scheduling rowing competitions, administering rowing workshops, bookings, team preparation, trip and transportation arrangement to events for high-performance athletes, and management of our services.
- Athlete vetting Vetting athletes who wish to participate in rowing events on behalf of Sport Ireland and other bodies. This may include financial information of athletes in some cases.
- Marketing & campaign management -
 - creating new marketing campaigns which may use names, photos, videos and recordings of donors, individual rowers, partner organisations, employees, or volunteers.
 - email management (identifying when emails are delivered, opened, and acted on).
 - conducting surveys to better understand your personal motivations for supporting our work or your experiences with us.
 - analysing competition records, training assessments and rower data to better understand the needs of our members and rowing trends of our member organisations.
 - to identify supporters who may want to make significant contributions to support Rowing Ireland.
- **Contract, invoice & tax certificate management –** sending out contracts, invoices, tax certificates, and payment notices.
- **Research** to help us understand how to support member clubs and individual rowers better in line with our mission.
- **Website security** we process IP addresses in our website for access logging and other technical administration and security purposes.
- **CCTV** and video recordings for security, and safety at the National Rowing Centre.
- COVID-19 contact tracing.
- Reporting injuries/emergencies

This list is not exhaustive and may be added to from time to time as the nature of our services or operations change.

What is our legal basis for processing your personal data?

Rowing Ireland will only process or use your personal information if we also have a legal reason for doing so. This is referred to in the GDPR as a 'lawful basis'. We rely on 5 lawful bases:

- You have asked us (for example, you signed up to be on our mailing list), or we've asked you, and you've provided us with your **consent**;
- We have entered a <u>contract</u> with you (for example, if you sign up for a rowing event or register a new rowing club);
- If we have a <u>legal obligation</u> to use or disclose information about you;

- If we have a <u>legitimate interest</u> to do so to support our mission. In those cases, we promise to use information fairly, reasonably, transparently, and to only use the least amount of information necessary to fulfil those interests;
- If we are protecting an individual's vital interests.

We've provided a general breakdown of the lawful bases we rely on depending on the broad categories of processing we're doing. If you'd like additional details on specific types of processing we do, please contact us at info@rowingireland.ie or contact our DPO directly at rowingireland@cloudpo.eu.

Processing Category	Legal Basis
HR	Contract, legal obligation & legitimate interests
Payments processing	Contract, legitimate interests
Communication	Consent, contract & legitimate interests
Administering events and competitions	Legitimate interests
Athlete Vetting	Legal obligation
Marketing & campaign management	Consent & legitimate interests
Data analysis and segmentation	Legitimate interests
Contract, invoice & tax certificate management	Contract, legal obligation
Research	Consent, legitimate interests
Website Security	Legitimate interests
CCTV and video recordings	Legitimate interests, legal obligation
COVID-19 Contact Tracing / Emergencies	Vital interests, legal obligation

Where do we keep your personal data?

Rowing Ireland uses servers primarily hosted in the European Economic Area (EEA). However, we use some services (including Google Workspace, Google Analytics, YouTube and our payment processors Stripe and PayPal), which do host information in the United States (or share it with US subsidiaries). We take reasonable steps to ensure that security measures are in place and that we only transfer as much information as is necessary to fulfil our purposes. As

a small volunteer organisation, we try to limit how much data we keep, but comparable tools located solely in the EU are often hard to find.

We use the following services to store data:

Processing Category	Countries Where Your Data is Processed
HR	(HR Duo)
Payments processing	Ireland / United States (Stripe/Paypal)
Communication	
Marketing & campaign management	Ireland / United States (Google Analytics)
Contract, invoice & tax certificate management	
CCTV and video recordings	Ireland (on prem)
Garda Vetting	Ireland (on prem)
COVID-19 Contact Tracing / Emergencies	Ireland (on prem)
Website Hosting	
RI Tracker Information	
Hosting	Google Workspace

How do we secure your personal data?

As a small volunteer-led organisation, we rely on our service providers such as Google and Stripe to do the heavy lifting from a security perspective. We also have various organisational measures in place to ensure that our staff and volunteers are protecting personal data.

We retain data for only as long as is necessary, and where possible, our communications are encrypted in transit using TLS.

How do we obtain your personal data?

Generally, we obtain information directly from you.

For example, you may provide us with personal information when you:

- register a member club.
- contact or visit us (in person, via phone, mail, email, or social media).
- participate in/attend a rowing event or competition.
- donate to Rowing Ireland.
- engage with our campaigns or sign up for a programme, event, or our newsletter on our website (in person, via phone, mail, email, or social media).
- partner with Rowing Ireland or complete a business transaction as a vendor or service provider.
- apply for a position or come to work or volunteer for Rowing Ireland.

But we also may collect personal data about you from third parties, for example:

- the rowing club you belong to.
- our sponsors and partner organisations (e.g. Department of Transport, Tourism and Sport, PowerHouse Sport, Sport Ireland, Sport Northern Ireland).
- social media sites (Facebook, Twitter, Instagram, YouTube).
- other third parties (e.g., Eventbrite, SurveyHero).
- other charities and NGOs we work with.

How long do we keep your data?

In general, we keep most data for no more than five years after your last contact with us, if you stop rowing, or the end of your membership period. Sometimes, we may have a legal, contractual, or other reason to keep your data, and we have outlined some of these reasons below:

Garda Vetting: In the case of Garda Vetting information, we shred forms and ID information immediately after they have been submitted to the Vetting Portal, but keep a spreadsheet of basic information (name and email address) for the vetting period (i.e., a maximum of 3 years). For more information, please review our <u>vetting procedures</u>.

High Performance Athletes: We keep athlete training records for seven years. Passport information for high-performance athletes are kept until the athletes retire. Under-23s passport information is purged every year.

Tracker Information: Details stored in our tracker application (see: If you are an athlete of a member club, If you are an athlete under the International Carding Scheme, or If you register a member club): Five years after your last involvement as a rower in an affiliated club.

Legal & Insurance Claims: Information that may be relevant to personal injury or discrimination claims may be retained until the statutory limitation period for those types of claims has expired. Please note that the limitation periods might not start to run well after your membership with us has ended.

We work to keep data in line with our retention policy, which includes minimising the amount of paper data we keep and regularly erasing data when it is no longer needed.

If you wish to have your information deleted, please contact our DPO.

Who do we share your data with?

Rowing Ireland will not share, sell, or exchange your information with other organisations for marketing purposes, however some of the cookies written by our websites support targeted online advertising and some data about you may be shared with those services through the operation of those cookies (e.g. your IP address and the fact you visited our site, liked a page on one of our social media sites, or shared some of our content online).

In some circumstances it is necessary for Rowing Ireland to share your personal data with our sponsor or partner organisations. This access is only granted to the extent necessary for them to fulfil their contractual obligations with us, or for us to fulfil our contractual or legal obligations with them, or at the request of an oversight body. We expect our sponsor and partner organisations to comply with strict rules to protect the information you have given us.

Additionally, we may share personal information in the following circumstances:

- at your request;
- to any rowing related administrative body to allow them to properly administer rowing on a local, regional, national, and international level;
- staff and volunteers who work at venues to support the delivery of Rowing Ireland events;
- business partners to provide services as required and/or requested by Rowing Ireland (e.g., a purchase made on our online shop or an event registration);
- other service providers (e.g., our membership system developers and hosting provider, and our online scoring system developer and/or servicer);
- the National Vetting Bureau (for vetting purposes);
- other government bodies, statutory authorities, or regulators, where we are required to do so by law.

What are my rights as a data subject?

Individuals have several rights over their personal data under EU law. Many of those rights focus on being informed (referred to as 'notice and transparency') about how we use your data. For example, you have the right to know about our purposes, reasons, retention, and who we share your data with, which you can find in this privacy notice.

But you also have other rights. Sometimes, these rights are not always absolute, and some qualifications and restrictions may apply (for example, we may not be able to delete information about you if we need it to comply with a legal obligation).

In general, you have the following rights under the GDPR:

- **Right of access** you have a right to access a copy of the data we hold about you.
- **Right to withdraw consent** if we process data based on your consent, you have the right to withdraw that consent at any time.
- **Right to rectification** if you believe the information we have about you is wrong, you have a right to ask us to correct that data.
- Right to erasure (aka, a right to be forgotten) you have the right to ask us to delete data about you. While this is not an absolute right, if we no longer need this data, we will delete it.
- **Right to data portability** In some circumstances, you have a right to receive your personal data in a machine-readable format.

- **Right to restrict processing** in some cases, you may ask us to stop processing your data in certain ways for example, if we process data for a purpose you do not consent to, and we do not have another lawful basis for processing.
- Right to refuse automated decision making and/or profiling Rowing Ireland does not engage in processing of this kind.
- Right to lodge a complaint with the Data Protection Commissioner You can complain to the Irish Data Protection Commissioner where you feel your rights have been infringed. Contact details are provided at the end of this Privacy Notice.
- Right to seek a judicial remedy: You have the right to make a legal claim where you believe we or our processors have not fulfilled our obligations under the Data Protection laws.

Rowing Ireland is committed to helping individuals exercise their rights. We will always balance our interests with your rights. If you have a query, you can email our DPO at rowingireland@cloudpo.eu or info@rowingireland.ie or write or call us.

Contact Details for the Office of the Data Protection Commissioner

You can contact our regulator via the contact information below.

Telephone: +353 57 8684800 / +353(0)761 104 800 / Lo Call No. 1890 252 231

Email: info@dataprotection.ie

Address: Data Protection Commissioner, Canal House, Station Road, Portarlington, Co. Laois.