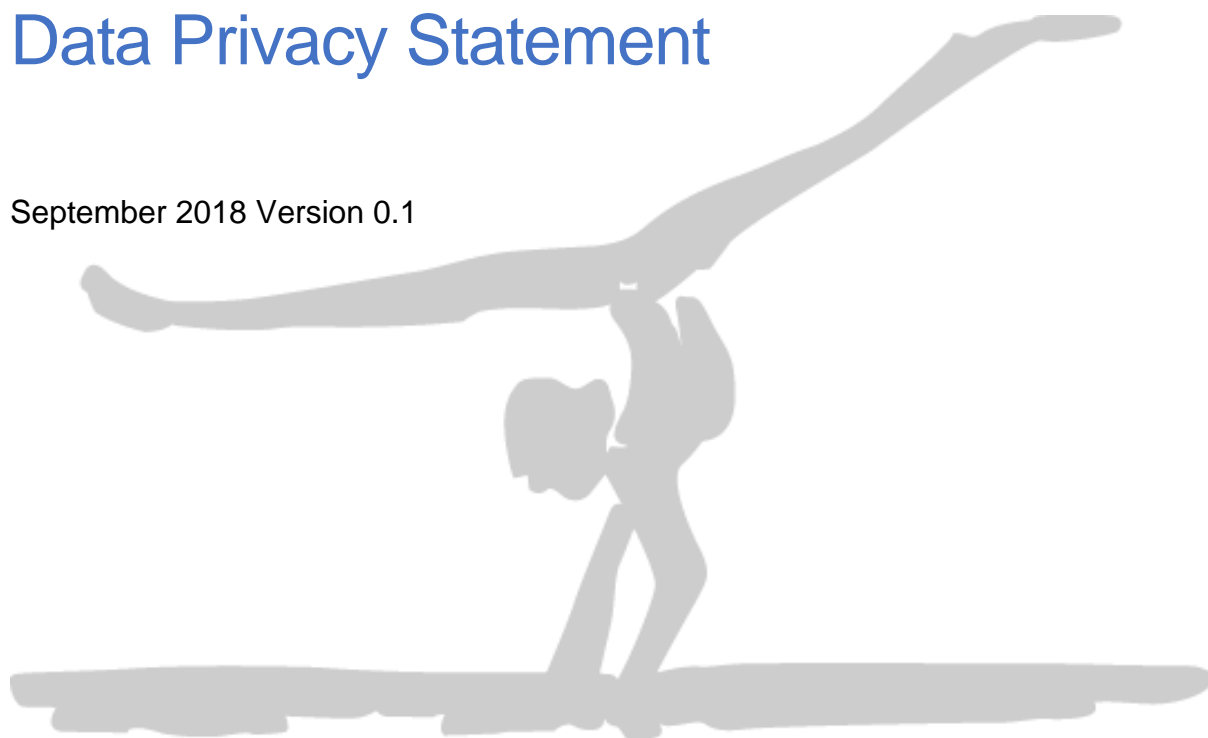


Renmore Gymnastics Club

Data Privacy Statement

September 2018 Version 0.1



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RENMORE GYMNASTICS CLUB



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RENMORE GYMNASTICS CLUB

1 Who Are We?

This is the Data Privacy Statement of Renmore Gymnastics Club, based at Unit 8, Racecourse Business Park, Ballybrit, Galway; our phone number is +353 91 392 544.

Renmore Gymnastics Club is based in the City of Galway on the West Coast of Ireland. We are dedicated to providing gymnastics training to children of all ages, and also run adult classes.

2 About This Statement

This Data Privacy Statement is designed to demonstrate our firm commitment to privacy, our compliance with the General Data Protection Regulation (GDPR) and to inform you of the personal data that we collect and process in connection with your interaction with Renmore Gymnastics Club.

It also sets out details of what personal data we process, why we process it, with whom your personal data is shared, and a description of your rights with respect to your personal data.

3 Personal Data Processed

The personal data we hold, process and retain will be used for the management of your account, for administrative purposes and for meeting our legal and regulatory obligations. We hold it and use it to protect your rights and interests and to manage our relationship with you appropriately, effectively and lawfully.

Where there is a need to process your data for a purpose other than those set out in this Data Privacy Statement, or otherwise outlined to you, we will inform you of this and, if required, we will seek your consent.

We capture your personal details in the following ways:

3.1 Online Account Setup

When you set up an account with us, we will seek the following personal data including names, email addresses, phone numbers, gender, date of birth and health information. Many members are minors, and, in these cases, the contact information is for the parent or guardian.

You will have access to your account online and can update any details as they change. We never use this data for any purpose other than the management of our gym classes, safeguarding our students and the fulfilment of our contract with you.

Please note that we do not retain any of your personal data in relation to debit/credit card payments made. These are processed through iClassPro, using the Braintree payment system, and only the card type, the last four digits of the credit card number and the expiry are visible to us in your account, to protect your card details.

When accounts have been inactive, lapsed or cancelled, all personal data is deleted after a six year period.

3.2 Camp Forms

We run camps for children. When the child arrives for a camp, a camp form is printed and filled. The information requested will include the parent's or guardian's name, email, phone number and the child's name, gender, date of birth and details of any health conditions. This information is used for the management of the camp during its operation.

These forms are kept on record for a four year period for insurance purposes.

3.3 Waiting Lists

We are a very busy club and have a long waiting list for majority of our classes. We hold a waiting list to ensure that the process is managed efficiently. The personal data held will be the same as for the account setup process.

These waiting lists are reviewed annually and anyone who isn't currently expressing an interest in being offered a space is deleted.

3.4 Enquiry Contacts

We have a number of enquiry requests come through to the email accounts we specify on our website contact page. The personal data would include a name and email address, and may include potential student details. Our email is secure and encrypted, with restricted access.

We retain these correspondences for a number of years as it can take some time to move from our waiting list to becoming a student, and we like to keep a clear audit trail of all communication.

3.5 Accident Forms

We record the details of any accidents that occur involving our students. The personal data recorded would include the student's name, the details of the accident, the injury sustained, the action taken and the follow up. This information is retained for a four year period.

3.6 Images or Videos Used on Our Website or Social Media

We recognise that an image of you or a child you are responsible for is considered personal data. At the time of account setup, we request your permission to use such an image or video on our website or social media from time to time, for the purposes of the promotion of club activities. If you decline, we will fully respect your wishes.

3.7 Cookies

Cookies are an industry standard and most major websites use them. A cookie is a small text file that a website may place on your computer as a tool to remember your preferences.

On our website we use Google Analytics cookies. Google Analytics captures your IP address and location to provide us with summarised information allowing us to analyse user traffic patterns.

Our website is integrated with iClassPro, our cloud based class management software. You can read more about their cookies here – [iClassPro Cookie Policy](#).

We have a Cookie Banner on our website, notifying users of our use of cookies and allowing them to read the Cookie Policy.

4 Special Categories of Personal Data

We acknowledge that we deal with special categories of personal data as we request the health and medical information of our students to enable us to understand their needs and deal with any medical emergencies that may arise. Any areas where this data is collected and processed have been carefully reviewed to ensure that rigorous security measures are in place.

5 Contacting You

We request your email and mobile numbers at the time of account set up. The majority of our members are minors and it is the contact details of the parent or guardian we require.

Calls and texts to mobiles will only be made for operational reasons and regarding club activities and events such as to inform you of a change in class times, cancellations, notify you when a payment is due or overdue, inform you of an emergency situation, notify you of important upcoming deadlines for competition, notify you of upcoming club event, to offer a space in a class or to suggest a transfer or trial, to reply to a text message you sent to us.

You may opt out from receiving text messages from us anytime by replying STOP in a text message. Please note that when you opt out from receiving text messages from us, you will no longer receive class cancellation/change notifications.

Email communication is used for the following purposes:

- to send receipts for payment and account statements and to remind of balance due or overdue;
- to send enrolment information (enrolment confirmation, space offer, transfer recommendation or approval, cancellation);
- to inform you of changes or cancellations to training;
- to send informational emails on upcoming classes, camps, competitions and club events;
- and to send a club newsletter.

Please note that club communications are only ever sent to active members. The only exceptions to this are:

1. informational emails on upcoming camps, tasters and trials, which will also be sent to members who have been inactive for up to a year;
2. informational emails on upcoming camps, tasters and trials, which will also be sent to contacts who have expressed interest in the club by creating an online account and who also opted in for E-mail Blast;
3. new space offers sent to non-members who have requested to be placed on a waiting list or an interest list.

We do not use your personal contact information to market products or services to you, nor do we ever share your data with another organisation for marketing purposes.

6 How is your Personal Data Shared?

Your personal data may be disclosed to third parties where we are legally obliged to do so. It will also be disclosed during activities where we have lawful contractual agreements in place that enable us to operate Renmore Gymnastics Club.

We process your personal data in the course of providing our services with the following sub-processors, who have all either confirmed GDPR compliance or are working towards it:

- iClassPro (class management and member account management software)
- Braintree Payment Software (online payment processing)
- SMS Portal (text communication)

- Google Drive (file storage)
- GSuite (Email, Drive, Google Docs)

The personal data of all new club members is shared with Gymnastics Ireland (GI) for mandatory insurance and membership purposes. GI have confirmed that they are GDPR compliant and the personal data is shared by a secure data upload from our IT system, directly to theirs.

We also share personal data with some subcontractors, which may include high-performance coaches and competition judges. All of our subcontractors have signed professional services contracts instructing them on how to process any personal data we share with them, in terms of keeping the personal data secure and private, and not retaining it for any longer than necessary.

7 Subject Access Requests

You have the right to access your personal data under the GDPR, including the right to update your data, have it deleted from our systems and to receive it in a manner that would allow you to port it to another club.

If you have a request, please contact us by email at info@renmoregymnastics.org. You must provide a copy of identification such as a driver's license or passport, and if you require that we reply by post, you must include a copy of a utility bill from within the last six months to provide proof of your postal address.

We fulfil all subject access requests within one month, where possible. In situations where requests are complex, we may need more time, but we will notify you of the delay within one month and will not take longer than two months in total. There are also situations where we cannot supply the personal data, and if this arises we will inform you and give a full explanation.

If you have a complaint about how we have handled your personal data or a subject access request, please contact Monika Corley, Club Manager, at monika@renmoregymnastics.org

You also have the right to complain to the Data Protection Commissioner if you are not satisfied with how Renmore Gymnastics Club has dealt with your Subject Access Request.

8 Security

Renmore Gymnastics Club takes the security of your personal information very seriously. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

These measures include having detailed policies and procedures for data protection and providing staff training and awareness. We review these measures regularly.

In addition, we limit access to your personal data to those employees, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

9 Children

The majority of our members are minors and for any person under the age of 18, we require a parent or legal guardian to give consent for the account setup and student participation in our club.

10 Data Breach Management

We fully comply with GDPR requirements in relation to data breach management. We commit to report these within 72 hours to the Data Protection Commissioners, to inform affected data subjects as soon as possible, to log all breaches internally and put corrective action in place to ensure that they do not reoccur.

11 Will Your Personal Data Be Transferred Abroad?

The system we use for account management is iClassPro and Braintree Payment Software; they have taken steps towards GDPR compliance, and are compliant in all aspects except the location of their servers, which are in the US, which means that your personal data is being stored outside the EU. However, iClass Pro have certified with [Privacy Shield](#), which is a mechanism for US companies to comply with data protection requirements when transferring personal data from the European Union to the United States.

The other systems we use to manage your personal data, the G Suite, including Gmail and Google Drive, and SMS Portal, allow us to use EU based servers for information storage.

12 Changes to this Privacy Statement

Renmore Gymnastics Club reserves the right to make changes to this privacy statement at any time by giving notice to its users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Date Published: 01/09/2018