



Data Protection Policy

Purpose

The purpose of this policy is to outline the IAWA responsibilities under the Data Protection Act 1988, the Data Protection (Amendment) Act 2003 and the General Data Protection Regulation 2018 (GDPR). The Irish Amateur Wrestling Association is committed to complying with its legal obligations with regard to the data protection legislation.

The Data Protection legislation imposes obligations on Data Processors and Data Controllers regarding how they process personal data and sensitive personal data. The purpose of this policy is to assist the Irish Amateur Wrestling Association to meet its statutory obligations as a Data Processor and/or a Data Controller, to explain those obligations to those who engage with us and to inform data subjects how their data will be processed. The GDPR applies to Organisations that:

- are established in one or more Member State(s);
- process personal data (either as controller or processor, and regardless of whether or not the processing takes place in the EU) in the context of that establishment.

Scope

This policy applies to everyone including volunteers who engage with the IAWA

Policy

Under the Data Protection legislation, all volunteers have a right to receive information on data collection, access their personal data, have inaccuracies corrected, have information erased and have a right to data portability. All our Volunteers are required to process personal data in line with this policy.

Data Protection Principles

The Organisation will comply with the data protection principles set out in the General Data Protection Regulation, 2018.

The Irish Amateur Wrestling Association ensures that all data is:

1. Obtained and processed lawfully, fairly and in a transparent manner.

The Organisation will meet this obligation by informing of the purpose(s) for which data is being processed as well as the legal basis for the processing; to whom data may be disclosed and if the Organisation intends to transfer data to a third country or international organisation outside of the EEA.

Where processing is necessary for the purposes of the legitimate interests of the Organisation, The Irish Amateur Wrestling Association will inform of the legitimate interests being pursued. Where the Organisation intends to record activity on CCTV, signage will be posted in full view.

The Organisation will adopt appropriate data protection notices at the point of data capture e.g. application forms.



Irish Amateur Wrestling Association

Website - www.irishwrestling.ie

2. Collected for specified, explicit and legitimate purposes and not be further processed in a manner that is incompatible with those purposes.

The IAWA will obtain data for purposes which are specific, lawful and clearly stated. The Organisation will inform of the reasons they collect their data and will inform of the uses to which data will be put. Should the Organisation subsequently intend to use the data for another purpose, consent of the person concerned will be sought prior to doing so unless a relevant exemption applies.

Data will only be processed in a manner consistent with the purposes for which it was collected. Information will only be disclosed on a need to know basis, and access to it will be strictly controlled.

The IAWA will not share personal information for direct marketing purposes outside of the organisation.

3. Adequate, relevant and limited to what is necessary in relation to the purposes for which data are processed.

The IAWA will ensure that the data it processes are relevant to the purposes for which those data are collected. Any personal data which is not required will not be collected in the first instance. Prior to obtaining personal data, the Organisation will ensure that the information sought is essential for the purpose for which data is being obtained and that data will not be kept for longer than is necessary for the purpose for which it was collected.

4. Accurate and up to date.

The IAWA is required to keep data accurate and up to date. The Organisation will meet this obligation by:

- Obtaining and processing only the necessary amount of information required to provide an adequate service;
- Conducting periodic reviews to ensure that relevant data is kept accurate and up-to-date;
- Conducting regular assessments in order to establish the need to keep certain Personal Data.

If we are informed of a change in personal information the Organisation will ensure this information is updated on all the Organisations internal systems and all third party providers are notified of this change where necessary.

5. Limited retention in a format that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

The IAWA will ensure that the data is kept in a form that permits identification of persons for no longer than is necessary for the purposes for which the personal data was processed.

Personal data is retained for a period of time to meet certain legal obligations.



Irish Amateur Wrestling Association

Website - www.irishwrestling.ie

Once the respective retention period has elapsed, the Organisation undertakes to destroy or erase personal data.

6. Secure and confidential processing of data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

The Organisation will undertake appropriate technical and organisational measures in order to protect the personal data under its care. Appropriate security measures will be taken to protect against unauthorised access to, unlawful processing, accidental loss, destruction or damage of any personal data held by the Organisation in its capacity as Data Controller.

Only persons engaged by the organisation with a genuine reason for doing so may gain access to the information. Sensitive Personal Data is securely stored under lock and key- in the case of manual records / protected with firewall software and password protection- in the case of electronically stored data.

Portable devices storing personal data (such as laptops) should be encrypted and password protected before they are removed from the Organisation's premises. Confidential information will be stored securely and in relevant circumstances, it will be placed in a separate file which can easily be removed if access to general records is granted to anyone not entitled to see the confidential data.

Our volunteers are also expected to keep Personal Data secure by adopting the following measures:

- Using secure lockable desks and cupboards. Desks and cupboards should be kept locked if they hold personal data.
- Paper documents containing personal should be shredded.
- Data users should ensure that individual monitors do not show Personal Data to passers-by and that they log off from their PC or password protect their PC when it is left unattended.

If the Organisation discovers that there has been a data security breach that poses a risk to the rights and freedoms of individuals, it will report it to the Data Protection Commissioner within 72 hours of discovery. If the breach is likely to result in a high risk to the data protection rights and freedoms of anyone, it will inform affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

7. The Organisation is committed to be accountable, liable and comply with the Data Protection Principles.

Collection and Storage of data

This Policy applies to all Personal and Sensitive Personal Data collected, processed and stored by the Organisation. In the course of its activities and in order to carry out its function, the Organisation processes personal data from a variety of sources. These sources include data in relation to its Volunteers, service providers, suppliers, customers and any other Data Subjects in the course of its activities.



Irish Amateur Wrestling Association

Website - www.irishwrestling.ie

The main categories of Personal Data held by the Organisation may include:

- Name, address and contact details, PPS number, dates of birth, personal stats re height, weight etc
- Details of any accidents/injuries sustained on Organisation property or in connection with the staff member carrying out their duties
- Details of payments re benefits and expenses
- Records of any interactions under the headings of grievance and discipline
- Training courses completed and qualifications awarded
- CCTV data
- Email system data
- Financial data
- Phone records
- Records of application and appointment to promotion posts
- Vetting records
- Competition data and statistics
- Medical records needed for competition
- Anti-Doping records if appropriate to testing
- Passport information where required

The Irish Amateur Wrestling Association will ensure that personal data will be processed in accordance with the principles of data protection, as described in the Data Protection legislation.

Personal data is normally obtained directly from the person concerned. In certain circumstances, it will, however, be necessary to obtain data from third parties e.g. references, international bodies.

Data Processing in line with Rights

The Organisation will process data in line with right to:

- receive certain information regarding the collection and further processing of their personal data;
- request access to any data held about them by a data controller;
- have inaccurate data corrected;
- have information erased;
- object to the processing of their data for direct-marketing purposes;
- prevent processing that is likely to cause damage or distress to themselves or anyone else;
- restrict the processing of their information;
- where processing is based on consent, to withdraw that consent at any time;



Irish Amateur Wrestling Association

Website - www.irishwrestling.ie

- data portability;
- object to automated decision-making and profiling.

Right to opt-out

The Organisation will inform individuals that information is being collected and used for these purposes prior to doing so. Individuals have the right to object to any specific type of data processing. Where such objection is justified, the Organisation will cease processing the information unless it has a legitimate business interest that prevents this.

Right to be forgotten

Persons may request that any information held on them is deleted or removed if there is no legitimate reason for the Organisation to keep it. Any third parties who process or use that data will comply with the request.

Storage of personal data

Personal data kept by Irish Amateur Wrestling Association shall normally be stored on the persons personnel file on the database.

IAWA will ensure that only authorised personnel have access to an personnel file. Senior persons may have access to certain personal data where necessary.

IAWA has appropriate security measures in place to protect against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access.

Changes in Personal Details

Persons are responsible for ensuring that they inform the organisation of any changes in their personal details e.g. change of address.

The IAWA will endeavour to ensure personal data held by is up to date and accurate.

The IAWA is under a legal obligation to keep certain data for a specified period of time.

Disclosure of Personal Data to Data Processors

In the course of its role as Data Controller, the Organisation may engage a number of Data Processors to process personal data on its behalf. This may include, but is not limited to providers such as competition organisers, Sport Ireland, International bodies etc. In each case, it is the Organisation's policy to ensure such organisation have a policy in place outlining their obligations in relation to the personal data, the specific purpose or purposes for which they are engaged, and the requirement that they will process the data in compliance with the Data Protection legislation.

As a Data Controller, the Organisation ensures that any entity which processes personal data on its behalf (a Data Processor) does so in a manner compliant with the Data Protection legislation.



Irish Amateur Wrestling Association

Website - www.irishwrestling.ie

Transfers outside of the EEA

It may be necessary in the course of our sport that we are required to transfer Personal Data to third party service providers in countries outside of the European Economic Area. When this is required, the Organisation will take steps to ensure that the data has the same level of protection as it does inside of the Republic of Ireland. The Organisation will only transfer the data to third parties that provides an adequate level of protection. Data that is transferred to a company in the United States which has signed up to the 'Safe Harbour' is permissible.

Security and Disclosure of Data

The IAWA shall take all reasonable steps to ensure that appropriate security measures are in place to protect the confidentiality of both electronic and manual data.

Security measures will be reviewed from time-to-time having regard to the technology available, the cost and the risk of unauthorised access. We will implement all company security policies and procedures e.g. use of computer passwords, locking filing cabinets etc.

Any breach of the data protection principles is a serious matter and may lead to disciplinary action up to and including dismissal.

Medical Data

The Organisation will retain records of medical data in order to ensure we can comply with all competition and sporting requirements including anti-doping for at least 1 year from the date of the event.

Email Monitoring

The Organisation provides email facilities and access to the internet. In order to protect against the dangers associated with email and internet use, screening software is in place to monitor email and web usage.

Mailboxes are only opened upon specific authorisation by the Secretary in cases where the screening software or a complaint indicates that a particular mailbox may contain material which is dangerous or offensive; where there is a legitimate work reason or in legitimate interest of the Organisation.

Access Requests

Volunteers are entitled to request data held about them on computer or in relevant filing sets. This includes personnel records held by The Irish Amateur Wrestling Association. The Organisation will ensure that such requests are forwarded to the Secretary in a timely manner, to enable them to process the request within the required timeframe. To make a subject access request, a Volunteer should send the request by email to the Secretary at irishwrestlingsecretary@gmail.com. In some cases, the Organisation may need to ask for proof of identification before the



Irish Amateur Wrestling Association

Website - www.irishwrestling.ie

request can be processed. The Organisation will inform the person if it needs to verify his/her identity and the documents it requires.

A data access request will be responded to within 1 month of receipt of the request though this period may be extended for up to 2 further months where necessary, taking into account the complexity and number of requests. The Organisation will write to the individual within 1 month of receiving the original request to tell him/her if this is the case.

Information will be provided in electronic form if the individual has made a request electronically, unless he/she agrees otherwise.

Documents are provided free of charge, unless the request is “manifestly unfounded or excessive”, in which case a fee of €10 may be applied. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which the Organisation has already responded.

If someone makes a data access request, the Organisation will inform him/her of:

- The purposes of the processing;
- The categories of personal data concerned;
- To whom the personal data has been or will be disclosed;
- Whether the data will be or has been transferred outside of the EU;
- The period for which the data will be stored, or the criteria to be used to determine retention periods;
- The right to make a complaint to the DPC;
- The right to request rectification or deletion of the personal data;
- Whether the data has been subject to automated decision making.

Formal requests, invoking the right to access to personal data must be made in writing.

Persons are only entitled to data about themselves and will not be provided with data relating to other parties. It may be possible to block out the data relating to a third party or conceal his/her identity, and if this is possible the company may do so.

Data that is classified as the opinion of another person, will be provided unless it was given on the understanding that it will be treated confidentially.

Anyone who is dissatisfied with the outcome of an access request has the option of using the Organisation’s grievance procedure.

Retention of personal data

Personal data is retained for a period of time to meet certain legal obligations. Once the respective retention period has elapsed, the Organisation undertakes to destroy or erase personal data.



Irish Amateur Wrestling Association

Website - www.irishwrestling.ie

Responsibilities

We will endeavour to ensure that this policy is communicated to all our members and will ensure that the policy is maintained and updated in line with legislative changes.

Our members are expected to comply with this policy and to raise issues of concern with us.

Failure to process personal data in compliance with this policy may result in disciplinary proceedings up to and including dismissal.

Complaints

Members have the right to lodge a complaint to the Data Protection Commissioner if they believe their rights under the Data Protection legislation are not being complied with by the Organisation.