

DATA PROTECTION POLICY

Revision History

Version	Author	Reason for change	Date
1.0	F. Lusson	Creation	01/06/2015
2.0	F. Lusson	Incorporation of GDPR directives	02/11/2017

Introduction

At Acebook privacy and data protection rights are very important to us.

Acebook is registered under the **Data Protection Acts 1988 and 2003** as a data controller and data processor and all personal data will be maintained in accordance with the obligations of that Act.

Data Protection is the safeguarding of the privacy rights of individuals in relation to the processing of personal data, in both paper and electronic format. The Data Protection Acts 1988 and 2003 (the “Data Protection Acts”) lay down strict rules about the way in which personal data and sensitive personal data are collected, accessed, used and disclosed. The Data Protection Acts also permit individuals to access their personal data on request, and confer on individuals the right to have their personal data amended if found to be incorrect.

This document outlines Acebook’s policy to help ensure that we comply with the Data Protection Acts.

Inquiries about this Data Protection Policy should be made to: **Manager, Compliance & Information Management, Acebook, WebAware Ltd, Leghowney, Donegal Town.**

Data Protection Policy

Purpose of this policy

This policy is a statement of Acebook's commitment to protect the rights and privacy of individuals in accordance with the Data Protection Acts.

Individuals' Responsibilities

Any staff member of organisations using Acebook who is involved in the collection, storage or processing of personal data has responsibilities under the legislation.

Any staff member involved in the processing/storing of personal data should make sure;

- to obtain and process personal data fairly.
- to keep such data only for explicit and lawful purposes.
- to disclose such data only in ways compatible with these purposes
- to keep such data safe and secure.
- to keep such data accurate, complete and up-to-date.
- to ensure that such data is adequate, relevant and not excessive.
- to retain such data for no longer than is necessary for the explicit purpose.
- to give, on request, a copy of the data to the individual to whom they relate, such a request is known as an ACCESS REQUEST (sample access request letter is attached in Appendix II)

Any data access requests received should be forwarded immediately to the Manager, Compliance & Information Management. A fee of €6.35 applies to any application for information under the Data Protection Acts.

Individual Rights

The individuals for whom Acebook stores personal data have the following rights:

- to have their personal data obtained and processed fairly
- to have personal data kept securely and not illegitimately disclosed to others.
- to be informed of the identity of the Data Controller and of the purpose for which the information is held.
- to get a copy of their personal data.

- to have their personal data corrected or deleted if inaccurate.
- to prevent their personal data from being used for certain purposes: for example, one might want to have the data blocked for research purposes where it is held for other purposes.
- under Employment Rights, not to be forced to disclose information to a prospective employer. No one can force another person to make an access request, or reveal the results of an access request, as a condition of recruitment, employment or provision of a service. Where vetting for employment purposes is necessary, this can be facilitated where the individual gives consent to the data controller to release personal data to a third party.
- It should be noted that under the Freedom of Information Act 2014, records containing personal information may be released to a third party, where the public interest so requires.

Principles of the Acts

Acebook will administer its responsibilities under the legislation in accordance with the eight stated data protection principles outlined in the Act as follows:

1. Obtain and process information fairly.

Acebook will obtain and process personal data fairly and in accordance with the fulfilment of its functions. In order for the system to operate, the following information is asked during the registration process:

- Gender: this is used to facilitate player groupings.
- First name, last name: for club membership use
- Address: for club membership use
- Email address: for club membership use
- Landline or mobile number: for club membership use
- Date of birth: this is for clubs to identify minors

2. Keep data only for one or more specified, explicit and lawful purposes.

Acebook will keep data for purposes that are specific, lawful and clearly stated and the data will only be processed in a manner compatible with these purposes. Data is used for the purpose of booking facilities and to facilitate communication with relevant users of the system (between club and players and between players to organise a game for example). Users have the option to opt-in and out of email communication from within their profile at any time.

3. Use and disclose data only in ways compatible with these purposes.

Acebook will only disclose personal data that is necessary for the purpose/s or compatible with the purpose/s for which it collects and keeps the data. Data is made available to clubs for membership management purpose. Data is not disclosed to any other third party entity.

4. Keep data safe and secure.

Acebook will take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of, the data and against their accidental loss or destruction. Acebook is aware that high standards of security are essential for all personal data.

All information susceptible of identifying an individual is stored encrypted (AES 128 bit key length), in a password protected data storage. HTTPS/TLS is used for data transmission (SHA 256 with RSA 2048 bits).

5. Keep data accurate, complete and up-to-date.

Acebook has procedures that are adequate to ensure high levels of data accuracy. Acebook will examine the general requirement to keep personal data up-to-date. Acebook has put in place appropriate procedures and tools to assist clubs in keeping data up-to-date.

6. Ensure that data are adequate, relevant and not excessive.

Personal data held by Acebook is adequate, relevant and not excessive in relation to the purpose/s for which it is kept. In order for the system to operate, the following information is asked during the registration process:

- Gender: this is used to facilitate player groupings (e.g. for gender related competitions).
- First name, last name: for club membership use
- Address: for club membership use
- Email address: for club membership use
- Landline or mobile number: for club membership use
- Date of birth: this is for clubs to identify minors

7. Retain data for no longer than is necessary for the purpose or purposes for which they are kept.

Acebook will keep personal data for as long as clubs requires it to function. Data will be deleted on written request, by either a club representative or an individual for whom the data belongs to.

8. Give a copy of his/her personal data to that individual, on request

Acebook has procedures in place to ensure that data subjects can exercise their rights under the Data Protection legislation. Requests will be fulfilled within 30 days (See appendix 2).

Roles/Responsibilities of Acebook

Acebook has overall responsibility for ensuring compliance with the Data Protection legislation. However, organisations who use Acebook and who collect and/or control the contents and use of personal data are also responsible for compliance with the Data Protection legislation. Acebook do provide support, assistance, advice and training to all its relevant staff to ensure it is in a position to comply with the legislation.



Acebook is registered as a Data Processor in compliance with the Act and the following roles are included in the registration,

Contact Person: Manager, Compliance & Information Management

Compliance Person: Manager, Compliance & Information Management

Procedures and Guidelines

This policy supports the provision of a structure to assist in Acebook's compliance with the Data Protection legislation, including the provision of best practice guidelines and procedures in relation to all aspects of Data Protection.

Review

This Policy will be reviewed regularly in light of any legislative or other relevant indicators.

Appendix I

Definitions

The following definitions are taken from the Data Protection Acts 1998 and 2003 Full copies of the act are available at the Data Protection Commissioner web site www.dataprotection.ie.

Personal data means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller;

Sensitive personal data means personal data as to -

- (a) The racial or ethnic origin, the political opinions or the religious or philosophical beliefs of the data subject.
- (b) whether the data subject is a member of a trade-union.
- (c) the physical or mental health or condition or sexual life of the data subject.
- (d) the commission or alleged commission of any offence by the data subject, or
- (e) any proceedings for an offence committed or alleged to have been committed by the data subject, the disposal of such proceedings or the sentence of any court in such proceedings.

Appendix II

Sample Letter

Please see below, sample wording for letter to access data held under the Data Protection Acts 1988 and 2003.

When requesting information, it is important to give any details that will help the person to identify you and find your data – for example an email address, any previous address or your date of birth, the club name; and be clear about which details you are looking for if you only want certain information. This will help Acebook to respond more quickly.

A fee of €6.35 applies to any application for information under the Data Protection Acts.

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Manager
Compliance & Information Management
Acebook
WebAware Ltd
Leghowney
Donegal Town

Dear Manager,

Under the Data Protection Acts 1988 and 2003, I wish to make an access request for a copy of any information you keep about me, on computer or in manual form.

[Insert relevant information to assist Acebook to identify you and find your data]

Yours faithfully,

[Name]