**PRiVACY NOTtCE**

**Introduction**

Welcome to the Irish Luge Federation’s Privacy Notice.

On 25 May 2018, the General Data Protection Regulation (GDPR) will come into force in the EU. The Regulation will change the way we collect, store, create, delete and use an individual’s personal data.

The Irish Luge Federation will respect your privacy and are committed to protecting your personal data. This Privacy Notice will inform you as to how we will protect your personal data that we hold, and also how we protect data that comes into our possession when you visit our website. We also wish to advise you about your Privacy Rights and how the law protects you.

**1. Important information and who we are**

**Purpose of this Privacy Notice**

This Privacy Notice aims to give you information on how we collect and process your personal data through your use of our website, membership lists and enquiries you may make with us regarding the activities we run or have responsibility for.

It is important that you read this Privacy Notice together with any other Privacy Notice or Fair Processing Notice we may provide on specific occasions when we are collecting or processing personal data about you. This is to ensure you are fully aware of how and why we are using your data.

**Controllers**

This Privacy Notice is issued on behalf of the Federation of Irish Luge who is the Controller of your data. When we mention "we", "us" or "our" in this Privacy Notice, we are referring to the Federation of Irish Luge who are responsible for processing your data.

**Contact details**

**Email address:** lugeireland@protonmail.com

**Changes to the Privacy Notice and your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. We would be grateful if you could please keep us informed if your personal data changes during your relationship with us.

**Third-party Links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their Privacy Statements. When you leave our website, we encourage you to read the Privacy Notice of every website you visit.

**The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

* Identity Data includes first name, last name, username or similar identifier, title.
* Contact Data includes billing address, delivery address, email address and telephone numbers.
* Financial Data includes bank account and payment card details.
* Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
* Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
* Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
* Usage Data includes information about how you use our website and services.
* Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, sexual orientation, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

**How is your personal data collected?**

We use a variety of methods to collect data from and about you through:

• Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, and email or otherwise. This includes personal data you provide when you:  
• apply for our products or services;  
• create an account on our website;  
• subscribe to our service or publications;  
• request marketing to be sent to you;  
• enter a competition, promotion or survey; or  
• give us some feedback.  
• Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

**How we use your personal data**

We confirm that we will only use your personal data in accordance with the General Data Protection Regulation (GDPR). We will use your personal data in the following circumstances:

* Where we need to perform the contract we are about to enter into or have entered into with you. This is called Performance of Contract and this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
* Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. This is called Legitimate Interest and this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
* Where we need to comply with a legal or regulatory obligation. This is called Comply with a legal or regulatory obligation and it means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

We do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

**The purposes for which we will use your personal data**

We have set out below, in a table format, a description of the ways we will use your personal data, and the legal basis under which we do so. For ease of use we have also identified what our legitimate interests are where appropriate.

Please be aware that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you require further details about the specific legal ground we are relying on to process your personal data, where more than one ground has been detailed in the table below.

|  |  |  |
| --- | --- | --- |
| **Purpose / Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
|  |  |  |
| To register you as a new customer | (a) Identity (b) Contact | Performance of a contract with you |
| To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) |
| To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |
| To enable you to partake in a prize draw, competition or complete a survey | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity (b) Contact (c) Technical | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical (b) Usage | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about goods or services that may be of interest to you | (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile | Necessary for our legitimate interests (to develop our products/services and grow our business) |

**Marketing**

We aim to provide you with choices regarding certain personal data uses, particularly around marketing and advertising:

**Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us on services/promotions we provide and you have not opted out of receiving that marketing.

**Third-party marketing**

We will obtain your express opt-in consent before we share your personal data with any company that is not for the Federation of Irish Luge marketing purposes.

**Opting out**

You can ask us to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of an enquiry or communication you have made with us.

**Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

**Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to obtain an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

In the event we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**Disclosures of your personal data**

From time to time we may have to share your personal data with the parties set out below for the purposes detailed in the table above.

**International transfers**

We do not transfer your personal data outside the European Economic Area (EEA).

**1. Data security**

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Additionally, we limit access to your personal data to those employees, agents, 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.  
We in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**Data retention**

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In determining the appropriate retention period for personal data, we will give consideration to the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see “Request Erasure” below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

**Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are as follows:

* **Request Access to your personal data (commonly known as a "Data Subject Access Request").**This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
* **Request Correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
* **Request Erasure of your personal data.**This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
* **Object to Processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.**You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
* **Request Restriction of Processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
* **Request the Transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
* **Withdrawal of Consent at Any Time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to discuss or exercise any of the rights set out above, please contact us.

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month.

**IP Addresses and Cookies Policy**

As stated above, we may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to any advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our Site and to deliver a better and more personalised service. They enable us:

* To estimate our audience size and usage pattern.
* To store information about your preferences, and so allow us to customise our Site according to your individual interests.
* To recognise you when you return to our Site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our Site.

Please note that any advertisers on our Site may also use cookies, over which we have no control.

**Information log and Disposal Schedule**

We show that we are lawfully processing your personal data in our Information and Disposal Schedules. This Schedule will show:

* The Information that we hold
* Who we share it with
* Why we hold it
* When we will dispose of it
* Who can access it