



# Irish Mountaineering Club

## Data Privacy Policy

### INTRODUCTION

At the Irish Mountaineering Club, privacy and data protection rights are very important to us.

Irish Mountaineering Club acts as a data controller and data processor and all personal data are maintained in accordance with the obligations of the General Data Protection Regulation and Data Protection Acts.

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 (referred to below as the “Data Protection Acts” or “DPA”) lay down strict rules about the way in which personal data and sensitive personal data are collected, accessed, used and disclosed.

### DEFINITIONS

**Irish Mountaineering Club** (also referred to below as “Club”, “IMC”, “we”, “our” or “us”) is a non-profit organisation who engage in all aspects of mountaineering and rock-climbing.

**Mountaineering Ireland** (also referred to below as “MI”) is the representative body for climbers in Ireland. All members of the Club must be registered with MI to receive insurance for public liability and limited personal accident cover.

The **General Data Protection Regulation** (referred to below as “GDPR”), comes into force on the 25<sup>th</sup> May 2018, replacing the existing data protection framework under the EU Data Protection Directive. The GDPR emphasises transparency, security and accountability by data controllers and processors, while at the same time standardising and strengthening the right of European citizens to data privacy.

**Data** is information which is stored electronically, on a computer, or in certain paper-based filing systems.

**Data subjects** for the purpose of this Policy include all individuals (prospective, existing and past members) about whom the Club holds personal data.

**Personal data** means data relating to an individual (“data subject”) who can be identified from that data, held either electronically or physically – this includes physical files, emails, systems, images or recordings of “data subject”.

**Sensitive personal data** are specific categories of personal data related to a person’s: race or ethnicity; political, religious or philosophical beliefs; sexual life or sexual orientation; health; genetic or biometric data; criminal record; or trade union membership. Sensitive personal data can only be processed under strict conditions, and requires the express consent of the person concerned.

**Data controller** is a person or organisation, who either alone or with others, controls the contents and use of personal data.

**Data processor** is a person or organisation, who processes personal data on behalf of a data controller. Data processors have a duty to protect the information they handle by following the data protection and security policies at all times.

**Processing** means performing any operation or set of operations on data, including:

- obtaining, recording or keeping data;
- collecting, organising, storing, altering or adapting the data;
- retrieving, consulting or using the data;
- disclosing the information or data by transmitting, disseminating or otherwise making it available;
- aligning, combining, blocking, erasing or destroying the data.

## **PURPOSE**

The Irish Mountaineering Club Data Privacy Policy (further referred to as “Policy”) is a statement of our commitment to protect the rights and privacy of all members in accordance with the GDPR and the DPA with the utmost care and confidentiality.

With this Policy, we ensure that we gather, store and handle member’s data fairly, transparently and with respect towards individual rights.

## **SCOPE**

This Policy refers to all individuals describes as ‘data subject’ who provide any amount of information to the Club.

## **DATA PROTECTION PRINCIPLES**

We shall perform our responsibilities under the GDPR and DPA in accordance with the following eight Data Protection principles:

- **Obtain and process information fairly.**  
We shall obtain and process personal data fairly and in accordance with statutory and other legal obligations.
- **Keep it only for one or more specified, explicit and lawful purposes.**  
We shall keep personal data for purposes that are specific, lawful and clearly stated.
- **Use and disclose only in ways compatible with these purposes.**  
We shall use and disclose personal data only in circumstances that are necessary for the purposes for which we collected the data.
- **Keep it safe and secure.**  
We shall take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of personal data and against its accidental loss or destruction.
- **Keep it accurate, complete and up-to-date.**  
We adopt procedures that ensure high levels of data accuracy, completeness and that data is up-to-date.
- **Ensure it is adequate, relevant and not excessive.**  
We shall only hold personal data to the extent that it is adequate, relevant and not excessive.
- **Retain for no longer than is necessary.**  
We shall only keep personal data for a period that is necessary for the purpose of data being collected.
- **Provided to data subjects, on request.**  
We adopt procedures to ensure that data subjects can exercise their rights under the Data Protection legislation to access their data.

## **RESPONSIBILITY**

Overall responsibility for ensuring compliance with the GDPR and DPA rests with the Club. All Club members who collect, control or process the content and use of personal data are individually responsible for compliance with the GDPR and DPA.

## **PROTECTION OF YOUR PERSONAL INFORMATION**

The Club will use appropriate administrative, technical, personal and physical measures to safeguard your personal information against loss, misuse, unauthorized access, theft, modification, disclosure and destruction. The Club will restrict access to your personal information under its control to those Committee Members who have a legitimate need for such access (such as Membership Officer, Meets Officer, Training Officer, Publicity Officer, Secretary and Chairperson).

The Club will promote awareness of the requirements and policies surrounding data protection and security of your personal information.

## **YOUR PERSONAL DATA HELD BY IMC**

We are required to hold your personal data for various legal and practical purposes, without which we would be unable to run the Club and administrate the membership process.

We collect and hold your personal information for membership purposes only. We don't collect and will never collect any sensitive personal information from you.

The information we hold about you is primarily information you provided when applying for the membership, stored in the IMC GroupSpaces account, such as:

- your name;
- your contact details (e.g. home address, mobile number, personal email address);
- your date of birth (to verify your age in accordance with the Club constitution);
- gender;
- your emergency contact details (e.g. name, mobile number);
- your Mountaineering Ireland number;
- your membership preferences (e.g. what details you want to publish in the IMC Contacts Booklet, whether or not you want to join the IMC WhatsApp Group, delivery method for the IMC Contacts Booklet and Newsletter).

Your contact details, emergency contact details and your membership preferences can be updated at any time by logging into your account in the IMC GroupSpaces account.

In addition to this, your record in the IMC GroupSpaces account holds information about your membership details, such as your subscription type, method of payment, first year joining the Club, membership type and status. All information is filled out by the IMC's Membership Officer when processing your membership and kept for Club's administrative and statistic purposes only.

The information we hold and process will be used for the management and administrative use for membership purposes only. We will keep and use it to enable us to run the Club and manage our relationship with you effectively, lawfully and appropriately, during your membership with the Irish Mountaineering Club.

## **PROCEDURE OF COLLECTING YOUR PERSONAL INFORMATION**

Member's personal information may be collected or accessed in a number of ways, including:

1. Directly from the members (whether in writing or verbally).
2. Generated by the Club's events and activities.

## **PROCESSING FOR MEMBERSHIP PURPOSES**

The Club will not process your personal Information for purposes other than the membership purposes as set out in this Policy.

In the circumstances where processing of personal information is not for membership purposes, the Club will obtain the individual's consent prior to the processing.

## **ACCURACY AND RETENTION OF YOUR INFORMATION**

The Club will employ reasonable means to keep your personal information accurate, complete, up-to-date and reliable for its intended use.

It is the responsibility of the individual member to update their data. In the circumstances, where they cannot update their data, a member has to inform the IMC's Membership Officer or IMC's Secretary of any changes to the personal data that they have supplied to it during the course of their membership.

The IMC's Membership Officer or IMC's Secretary will amend the member's personal information on behalf of members and inform the relevant third parties where applicable (such as Mountaineering Ireland).

The Club will ensure that your personal data are not kept longer than is necessary for the purpose. However, the Club may need to retain member's data for a period of time in order to protect its legitimate interests.

## **YOUR RIGHTS**

Under the GDPR and the DPA, you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

Where possible, we will comply with all such requests, though some details are part of the records which cannot reasonably be deleted, restricted or objected to in line with the Club constitution.

The Club reserves the right to make a decision as to what information we must continue to hold to be able to fulfil the purpose of data collection, processing and retention in line with the Club constitution and Irish legislation.

## **OPT OUT FROM CLUB CORRESPONDENCE**

If you wish to opt out from email and/or postal Club correspondence related to the Club activities, please contact the Membership Officer on [membership@irishmountaineeringclub.org](mailto:membership@irishmountaineeringclub.org) or Secretary on [secretary@irishmountaineeringclub.org](mailto:secretary@irishmountaineeringclub.org) or send a request to the Club postal address: Dublin Climbing Centre, ATT: Irish Mountaineering Club, Unit 3, The Square Industrial Complex, Dublin 24.

You will be removed from the mailing list as soon as possible, but no later than 14 days after receipt of your request.

## **DATA SUBJECT ACCESS REQUESTS**

A formal request from a data subject for information that the Club holds about them must be made in writing and sent either via email to [secretary@irishmountaineeringclub.org](mailto:secretary@irishmountaineeringclub.org) or to the Club postal address: Dublin Climbing Centre, ATT: Irish Mountaineering Club, Unit 3, The Square Industrial Complex, Dublin 24. Acknowledgment email / letter will be sent by Club Representative within 7 calendar days upon receipt of such request.

Data Subject Access Request will be provided in accordance with the GDPR without undue delay and at the latest within one calendar month of receipt.

## **TRANSFER OF PERSONAL DATA TO A THIRD PARTIES**

The Club may disclose member's personal information to third parties that supply services to the Club which require the processing of your personal information. The Club will only transfer your personal information where the third party has provided written assurances to the Club that it will protect any member's personal information disclosed to it in accordance with the provisions of this Policy. If the Club has knowledge that the third party is processing member personal information in a manner contrary to this Policy, it will take all reasonable steps to prevent or stop the processing.

If you are not an existing member of the Mountaineering Ireland, the Membership Officer registers you with MI by creating your online account by providing your full name, gender, date of birth, email address, your phone number and home address. All IMC members must be registered with Mountaineering Ireland in order to benefit from the public liability and limited personal accident insurance among other benefits.

If you are a new member of the IMC, the Membership Officer creates your account in the IMC website by using your first name, last name and email address you provided in the IMC GroupSpaces account. Creating an account in the IMC website gives member an exclusive access to the Forum, section that is restricted to a public access and is used as main source of communication between Club's members.

Other than as mentioned above, the Club will only disclose your personal information to third parties if required by law or legal process (including disclosures to law enforcement authorities in connection with their duties), to protect the interests of the Club and/or its members or if there is an emergency situation involving the health and safety of a member.

## **REVIEW**

The content of this Policy is designed to provide general guidance on matters related to member's data protection and our compliance. In preparing this Policy, every effort has been made to ensure the content is informative.

The Club will continue to review the effectiveness of this Policy to ensure it is achieving its stated objectives on at least an annual basis and more frequently if required taking into account changes in the law and Club's constitutional or security changes.

## **CONTACT**

All questions relating to the execution or interpretation of this Policy should be addressed to Club's Secretary at [secretary@irishmountaineeringclub.org](mailto:secretary@irishmountaineeringclub.org) or Club's Membership Officer at [membership@irishmountaineeringclub.org](mailto:membership@irishmountaineeringclub.org)

## DOCUMENT CONTROL

### Confidentiality Notice

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### Document Details

Document Name:	<b>Data Privacy Policy</b>
Current Version Number:	Version 1
Effective Date:	25 <sup>th</sup> May 2018
Classification:	Internal Use
Document Prepared by and Role:	Petra Tolarova, IMC Membership Officer
Document Approved by and Role:	Cillian Russell – IMC’s President Dermot O’Dwyer – IMC’s Chairperson Harry McGee – IMC’s Publicity Officer Matthew Sammon – IMC’s Secretary
Date Approved:	25 <sup>th</sup> May 2018