### Irish FA Football Management System Privacy Notice

## 1. Introduction

- 1.1. This Privacy Notice sets out how the Irish Football Association (Irish FA) process your personal data using the Football Management System (IFA FMS).
- 1.2. IFA FMS is a web-based system used by the Irish FA, Divisional Associations, Leagues, and Clubs for football administration.
- 1.3. IFA FMS is used for club and player registration, competition management, and discipline.
- 1.4. The Irish FA is obligated to comply with the General Data Protection Regulation (GDPR). This Privacy Notice is written to comply with the GDPR. The Irish FA takes your privacy seriously and we are committed to your data protection rights. Section 11 in this privacy notice sets out more details of your data protection rights.

# 2. Scope

- 2.1. This Privacy Notice describes how the Irish FA, Divisional Associations, Leagues, and Clubs will process your data in the IFA FMS.
- 2.2. IFA FMS collects data in relation to a number of different types of users. This privacy notice focuses on the use of data relating to players, parents/guardians, club officials, and match officials.

# 3. Terms and Definitions

- 3.1. The term "us" or "we" or "our" refers to the Irish FA.
- 3.2. The term "you" or "your" refers to the data subject, or whom we are processing personal data about.
- 3.3. The term "them" refers to Irish FA third parties.

#### 4. Summary of how we use your data

- 4.1. The IFA FMS is intended for the purpose of football administration in Northern Ireland.
- 4.2. Data may be provided by you, a club official, a league official, a divisional association official, or by a referee submitting a report.

- 4.3. Information and data is shared between Clubs, Leagues, Divisional Associations, and the Irish FA for the purpose of football administration.
- 4.4. Where the Irish FA collects or uses your personal data for commercial purposes, you will be notified accordingly. The Irish FA is not entitled to use your personal data for commercial purposes unless you agree for us to do so.
- 4.5. If you are registering a third party into IFA FMS, you must make sure they are aware of this, and direct them to view this privacy notice. Where given an appropriate email address, the Irish FA will take steps to ensure individuals are aware of their registration and are provided this privacy notice.
- 4.6. If you are a referee, you might be asked to place sensitive data into the system in order to allow the Irish FA to carry out monitoring duties.
- 4.7. Information stored for disciplinary purposes may be retained and stored indefinitely in order to maintain a record of the game.
- 4.8. Information related to disciplinary may be shared with Irish FA members such as Disciplinary Committee and Appeals Committee.

## 5. What information does IFA FMS process?

- 5.1. IFA FMS collects and processes personal data about players, parents/guardians, club officials, and match officials.
- 5.2. If you are participating in an Irish FA event or competition, we may receive information about you from another team member or official responsible for entering you or your team into our competition.
- 5.3. Data processed about players includes:
  - 5.3.1. Your name
  - 5.3.2. Your date of birth
  - 5.3.3. Your country of birth
  - 5.3.4. Your contact details including email address and phone number, as provided by you, your parent/guardian, or a club official.
  - 5.3.5. Previous information relating to football such as previous clubs
  - 5.3.6. Your gender
  - 5.3.7. Your photograph
  - 5.3.8. Details of any discipline or misconduct as submitted by a referee
  - 5.3.9. Details of any appeals against disciplinary decisions made on your behalf by a club official
- 5.4. Data processed about Club Officials includes:

- 5.4.1. Your name, unique login, and password
- 5.4.2. Your date of birth
- 5.4.3. Your gender
- 5.4.4. Your role within the club
- 5.4.5. Previous information relating to football such as previous club affiliation
- 5.4.6. Your contact details including email address, phone number, and residential address as provided by you, or another club official.
- 5.4.7. Payment details where you use a bank account to make a payment
- 5.5. Data processed about Referees includes:
  - 5.5.1. Your name, unique login, and password
  - 5.5.2. Your date of birth
  - 5.5.3. Your gender
  - 5.5.4. Your photograph
  - 5.5.5. Previous information relating to appointments
  - 5.5.6. Your contact details including email addresses, phone number and residential address as provided by you
  - 5.5.7. Details of any misconduct as submitted by a Club, League, Divisional Association, Committee, Committee Member or department within the Irish FA
  - 5.5.8. Details of any challenges or appeals against disciplinary decisions made by the Discipline Committee or Appeals Board
  - 5.5.9. Details of your Association and grade
  - 5.5.10. Details of certificates held and training courses attended
- 5.6. Data processed about parents or guardians includes:
  - 5.6.1. Your name
  - 5.6.2. Your email address

# 6. Irish FA third parties and data sharing in IFA FMS

- 6.1. Analyticom is the third party service provider who host the IFA FMS system. Analyticom will be able to access the system and your data for technical support purposes. Analyticom is not entitled to use your data for their own purposes unless you agree to them doing so. Analyticom is a company whose Head Office is in Zagreb, Croatia. All data captured via the system will be stored in Analyticom's data centre in Germany which is replicated in another data centre in New Zealand.
- 6.2. Where you are a player, your initial registration information may be entered into the system by a club official at your current club, although the data will initially be collected from you.

- 6.3. Information about players is shared amongst Leagues, Divisional Associations, the Irish FA, and other Football Associations for football administration purposes.
- 6.4. Information relating to your disciplinary record and any misconduct charge will be provided by a referee directly into IFA FMS.
- 6.5. Information relating to your disciplinary record and any misconduct charge will be shared with Irish FA members including Disciplinary Committee, and where necessary Appeals Committee.
- 6.6. Where you are a club official, information may initially be entered into the system by us or by another club official. Information about training or usage checks may also be provided by a third party.
- 6.7. Mail Chimp is an application service we use to help us communicate to our members, customers, and fans. We may use Mailchimp to communicate with you if you have agreed to us contacting you for commercial purposes.

## 7. How your data is processed, and what is the legal basis for this use?

- 7.1. Your data is processed by Clubs, Leagues, Divisional Associations, and the Irish FA for legitimate football administration purposes.
- 7.2. Your Club will use your data to administer its Club and teams in particular for the following purposes:
  - 7.2.1. Adding new players
  - 7.2.2. Searching for existing players
  - 7.2.3. Communicating with you in relation to administration
  - 7.2.4. Eligibility checks
  - 7.2.5. Complying with Irish FA Player Registration Regulations
  - 7.2.6. Complying with FIFA Player Registration Regulations
- 7.3. Your League will use your data to administer its competitions and teams for the following purposes:
  - 7.3.1. Communicating with you to administer the competitions
  - 7.3.2. Communication directly with club officials about you
  - 7.3.3. Eligibility checks
  - 7.3.4. Complying with Irish FA Player Registration Regulations
  - 7.3.5. Complying with FIFA Player Registration Regulations
- 7.4. Your Divisional Association will use your data to administer its competitions and teams for the following purposes:

- 7.4.1. Communicating with you to administer the competitions
- 7.4.2. Communication directly with club officials about you
- 7.4.3. Eligibility checks
- 7.4.4. Complying with Irish FA Player Registration Regulations
- 7.4.5. Complying with FIFA Player Registration Regulations
- 7.5. The Irish FA will use your data for football administration purposes including:
  - 7.5.1. Communicating with you to administer football
  - 7.5.2. Eligibility checks
  - 7.5.3. Maintaining records including match reports and disciplinary
  - 7.5.4. For monitoring purposes
  - 7.5.5. Complying with Irish FA Player Registration Regulations
  - 7.5.6. Complying with FIFA Player Registration Regulations
  - 7.5.7. Publicly available contact information to enable contact with your club
- 7.6. The Irish FA will use your data for commercial and marketing purposes where you give us consent to do so. This includes:
  - 7.6.1. Our own commercial and marketing activities
  - 7.6.2. Marketing on behalf of our third-party affiliates, partners, and/or service providers.
  - 7.6.3. On other occasions where we ask you for consent, we will explain the purpose at the data collection point.
- 7.7. Where we rely on consent to process your data, you will always be able to withdraw consent at any time.
- 7.8. The Irish FA will use your data where we have a legal basis to fulfil legal obligations in requests by government or law enforcement authorities.

#### 8. Cookies

8.1. We use cookies in a very limited way in order to improve user experience such as for user settings.

#### 9. International

9.1. We will only share data with entities outside the EU where we are compelled by FIFA regulations to issue an International Transfer Certificate.

#### 10. Retention

10.1. IFA FMS data retention policy complies with Irish FA Player Registration Regulations and FIFA Player Regulations.

- 10.2. Personal data processed in IFA FMS will be retained for as long as you are a member of the club. The club or League may hold your data in a paper record format.
- 10.3. We retain your information in IFA FMS for 30 months after you have become inactive as a player. We may retain limited information about you for longer than 30 months where we have the legitimate interest to do so.
- 10.4. The Club, League, Divisional Association, and Irish FA will retain information about discipline indefinitely to maintain a record of the game.
- 10.5. Where we process your personal data for legal purposes, we hold this for as long as the law requires.
- 10.6. Where we process your personal data for marketing purposes or with your consent, we process the data until you ask us to stop (opt-out). We keep record of your consent including if you have asked us not to send you direct marketing and so that we can comply with your right to withdraw consent.

# **11. Your Data Protection Rights**

- 11.1. The Irish FA is the data controller of IFA FMS for player registration purposes. Clubs or Leagues are the data processor.
- 11.2. Provision of personal data for registration purposes and the provision of contact details is mandatory to allow for football administration. If relevant data is not provided, the controller and the processor will not be able to administer football, the rules of the game, their club, league, or division.
- 11.3. You have the right to access the information that IFA FMS holds about you. You may do this by writing to us at info@irishfa.com. We may require you to verify your identity for us to proceed with your right to access information we may hold about you. Please note that in certain circumstances the Irish FA may withhold access to your information where we have the right to do so under the GDPR. We will always notify you if this is the case.
- 11.4. You have the right to withdraw consent wherever IFA FMS relies on your consent to process your personal information.
- 11.5. You have the right to have us delete or erase information that IFA FMS holds about you. You may do this by writing to us at <u>info@irishfa.com</u>. We may require you to verify your identity for us to proceed with your request. Please note that in certain circumstances the Irish FA may not delete or erase information we hold about you where we have the right to retain the information under the GDPR. We will always notify you if this is the case.

- 11.6. You have the right to object to us processing your data in some circumstances in IFA FMS. You may do this by writing to us at <u>info@irishfa.com</u>. We may require you to verify your identity for us to proceed with your request. Please note that in certain circumstances the Irish FA may not carry out your right to object information we hold about you where we have the right to retain the information under the GDPR. We will always notify you if this is the case.
- 11.7. Your rights may be limited if fulfilling any of your rights would reveal personal data about another person, where it would infringe on the rights of the third party, or where there is a legitimate interest to retain the information or the retention of the information is required by law.
- 11.8. So that we can keep your information up to date and accurate if there is a change to your personal information please let us know the changes by emailing us at info@irishfa.com.
- 11.9. If you do not wish to receive any more information from us or be contacted by us in accordance with any of the above, please inform us by emailing us at info@irishfa.com.

## How to contact us

If you have any queries about this Privacy Notice, want the Irish FA to stop communicating to you, or want to exercise your rights such as those described above you may do this by emailing us at <u>info@irishfa.com</u>.

If you have any questions, queries, or complaints and to exercise your personal data rights, please contact the Data Protection Officer for the Irish FA.

# **Data Protection Authority**

The Irish FA acknowledges the Information Commissioners Office (ICO) as the data protection authority in the UK and Northern Ireland. You may contact the ICO at any time. Contact details can be found on the website <u>https://ico.org.uk/</u>