

**TEMPLATE: GDPR AND SERVICES.**

**Note: This document is in word format and should, where applicable, be modified to meet the requirements of the particular service being undertaken by the Club, or such other activity of the Club where *personal data* is collected or required.**

**APPLYING THE PRINCIPLES: -**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (The Service).**

1. **WHO.**
2. Guests.
3. Helpers.

Guests and helpers should each be given a copy of a policy containing the information below in addition to information on their entitlements under GDPR.

**B. What information.**

**Guests:**

1. Name.
2. Address.
3. Health/ Medical requirements/ medication.\*
4. Next of kin and contact details.

(\*Note: point No. 3 above requires the explicit consent of guest / helper concerned as the data is classified Special Category Personal Data.)

**Helpers:**

1. Name.
2. Address.
3. Information necessary for Garda vetting.\*

(\*Note: point No. 3 above requires the explicit consent of guest / helper concerned as the data is classified Special Category Personal Data.)

**C. Why/ legal basis**

 (\*Note: point No. 3 under B above requires the explicit consent of guest / helper concerned as the data is classified Special Category Personal Data.)

**Legitimate Interest**

**Example (Trabolgan)**

* The information is essential for the orderly conduct of the project, in terms of guest safety, security, accommodation, food and welfare.
* The information is required to enable the owners of Trabolgan to organise and operate their resort in an orderly and efficient manner.
* The information is required to enable District 133 and /or the owners of Trabolgan to meet their respective contractual obligations, including insurance obligations.
* The information is essential to enable the organising committee to respond to medical emergencies.

Note. In establishing the legitimate interest the organising committee must be satisfied that the purpose and use for which the data was obtained does not offend the human rights or dignity of the persons to whom the data belongs and is, in their opinion, the minimum required for the purpose of the service.

**Set out legitimate Interest.**

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**D. How information is obtained.**

**Example (Trabolgan)**

1. Guests complete a Guest Application Form (“GAF”).
2. Guest is furnished with GDPR Policy Notice and Consent Form.

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**E. How information is used.**

**Set out the purpose and manner in which personal information is used.**

**Example Trabolgan**

1. Registration with organising committee and Trabolgan.
2. Released to transport team to meet guest transport requirements.
3. Released to Medical Team to ensure guest welfare.
4. For insurance/ safety purposes in the event of an accident/ incident.
5. Released to doctors or hospital should medical assistance or treatment be required.

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**F.**  **How is information stored?**

**Example Trabolgan**

1. Hard copy GAFs retained by organising committee.
2. Information is retained on organising committee’s computer.
3. Information is retained on Trabolgan’s computer in line with their GDPR policy (?).

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**G. How is information secured?**

1. Use of firewalls/ passwords/ encryption

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**H. How long is the information retained?**

**Example Trabolgan**

1. GAFs: for a period of 3 years in line with insurance requirements.
2. Computerised records for period of 6 years, as records of contract.

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**I. How is information accessed for retrieval, correction and /or destruction?**

1. Application to organising committee chairman / GDPR Secretary.

2. Information is destroyed:

a. Hard copy after 3 years.

b. Electronically held information after 6 years.

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**J. How is information retrieved?**

Data must be forwarded to the data subject as a hard copy printout or, at their request, in a digitally portable and legible format.

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**K. GDPR Compliance assessment.**

Chairman of the organising committee/ Services Chairman reports to the Club Secretary/ GDPR Officer at the monthly Club meeting immediately following a service. It is recommended, that a completed sheet containing the above information is presented to the Club secretary or the club’s GDPR officer at the meeting. The report should details the following.

Confirmation (where applicable):

1. All guests received GDPR policy.
2. Explicit consent obtained from all those providing any health/ medical; data.
3. Use of data.
4. Where stored. And security arrangements.
5. If there were any data request and how handled.
6. Timely destruction of data following retention period.
7. Any breach of Data Protection.
8. Any other matters as may arise.

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