



Trinity College Dublin

Coláiste na Tríonóide, Baile Átha Cliath

The University of Dublin

Privacy Notice

Introduction

This is a statement of the practices of Trinity Sport, Trinity College Dublin, The University of Dublin (the "University") of College Green, Dublin 2, Ireland in connection with the capture of personal data on this application – Gladstone Mobilepro application and the steps taken by the University to respect your privacy.

The University fully respects your right to privacy and actively seeks to preserve the privacy rights of those who share information with the University. Any personal information which you volunteer to the University will be treated with the highest standards of security and confidentiality, in accordance with Irish and European Data Protection legislation. From 25 May 2018, we shall process your personal data in accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679.

The privacy notice explains the following

- How we collect and use your personal data?
- The purpose and legal basis for collecting your personal data
- How we store and secure personal data?
- Details of third parties with who we share personal data
- What are your rights?

How we collect your personal data and what is the purpose and legal basis for collecting your data

The data collected from you will be used by the University only in accordance with the purposes outlined in this privacy notice. Your data is collected in the following manner:

Downloading our App

When downloading the Mobilepro app, your required information is transferred to the App Store, in particular your username, email address and customer number of your account, time of download, payment information and your individual device code.

Our Service provider, Gladstone MRM Ltd., has no influence on this data collection and are not responsible for it. They only process the data as far as it is necessary for downloading the app to your mobile device.

The legal basis for processing is Article 6 para. 1 sentence 1 lit. b of the GDPR.

Use of our app

You can use the app with or without login. When using the app without logging in, the personal data described below is collected to enable convenient use of the app. The data is technically necessary to offer you the functions of our app and to ensure stability and security (legal basis is Art. 6 (1) sentence 1 lit. of the GDPR):

- IP address
- Date and time of inquiries
- Time zone of the device
- App version, device type, device name, operating system, operating system version
- Language setting of the device
- Anonymous ID of the app installation
- Selected clubs and marketing preferences
- Amount of unread data

Cookies

In addition to the above-mentioned data, when you use our app cookies are stored embedded web pages on your device. Cookies are small text files that are stored in the device memory of your device and stored in the app you are using. Cookies allow the organisation that sets the cookie to receive certain information. Cookies cannot run programs or transmit viruses to your device. They serve to make our app more user-friendly and effective overall.

The legal basis for the use of cookies is Art. 6 para. 1 p. Lit. f) of the GDPR: the processing is done to improve the functioning of our app. It is therefore necessary for the protection of our legitimate interests. If you do not wish to use cookies, you may de-activate cookies in your web-browser or reject the creation of cookies.

More features and functions in our app

Within the app, various other features and services that you can use if interested, for these a login may be required. You may also be required to submit other personal information that is used to provide the service and for which the aforementioned data-processing principles apply.

This information includes personal data such as first name, last name, e-mail address and telephone number.

The above data fields are mandatory. All other personal information you enter in the app is optional. Depending on the membership administration, booking and training system, this additional data will vary. In this regard, by entering your data you consent to the processing of the data in accordance with this Privacy Policy. You can revoke this consent at any time by sending an e-mail to our below mentioned e-mail address.

This does not apply if the processing is necessary to fulfil our contractual services. In this case, the processing is based on Art. 6 para. 1 sentence 1 lit. b of the GDPR.

How we store and secure your data

External Service Providers

External service providers in part to process your data. These have been carefully selected and commissioned by us, are bound by our instructions.

The legal basis for the processing of the mandatory personal data is Art. 6 (1) sentence 1 lit. b of the GDPR; for processing the data voluntarily entered by you Art. 6 para. 1 sentence 1 lit. a of the GDPR.

Various external service providers for the provision of the app. These service providers have access to the personal data that you submit via the app. The processing of this data by the service providers takes place on the basis of a legal data protection privacy agreement.

These service providers belong to the following categories:

- hosting service providers,
- member management and billing service providers,
- training and booking service providers,
- payment processing service provider,
- User authentication service provider,
- communications services providers
- Error and fault analysis service providers.

All the external service providers for the Trinity Sport Mobilepro app service are in countries within the European Union and covered by data protection agreements with the service providers on the basis of the EU standard contractual clauses,

<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32010D0087&from=EN> .

The inclusion of service providers is based on Art. 6 para. 1 sentence 1 lit. f of the GDPR. It is required to deploy the app.

Membership Administration, Booking and Training

You can manage your membership in the app, make and receive bookings, view and manage appointments, other functions. For this, the following data from our membership management, and booking system is processed:

- Personal data such as name, title, company, gender, date of birth,
- Communication data such as e-mail address, telephone number, address,
- Contract data such as type of membership, options booked,
- Identification data such as user name, password, user IDs, member IDs,
- Usage data and interests such as booking and appointment history, gym visits, app favourites,
- Training data such as courses attended, practice history, performance ratings
- Financial information such as transaction history, credits, account balance.

These data items are technically required for us to offer these features in the app. The legal basis for this is Art. 6 para. 1 sentence 1 lit. f of the GDPR.

Processing of your Location Data

The app offers location based services, with which we offer you special functions and offers that are tailored to your particular location, for example when arriving at the gym or in the gym search. You can only use these functions after you have agreed via a pop-up that we can collect your location data for the purpose of providing services using GPS, Bluetooth beacons and your IP address. We also use QR codes to determine your location, for example, when you arrive at the gym to check you in.

You can allow or revoke this feature at any time in the settings of the app or operating system. The location will only be transferred to us if you use features in the app which need to know your location.

We use location data to provide you with specific location-based features and offerings and to enhance the user experience in the app. We use navigation data alone or in combination with personal information to provide these features.

You can object to this by turning off the location services for our app in the settings of the app or operating system. Your location data will not be used to create motion profiles beyond your current location.

The legal basis for the use of your location data is your consent in accordance with Art. 6 para. 1 sentence 1 lit. a of the GDPR and our legitimate interest Art. 6 para. 1 sentence 1 lit. f of the GDPR.

Analysis of your app usage

We use mobile analytics software to analyse the functionality of our app on your mobile device. This software can collect information in the following ways: how often you use the app and events that occur in the app, such as: click-stream (what items you click) and what content you view. When we analyse this, we link the analysis information with your personal data.

We use this information to: (a) optimize and enhance your user experience while using the App; (b) to send you relevant information and offers by push message, e-mail or any other means, provided that you have given us your consent; (c) to provide anonymous statistical information about our users and our service; however, these are fundamentally data that do not allow identification of a single user; (d) for the provision of customer support services.

The legal basis for the processing is our legitimate interest in the analysis of user behaviour to optimize our app in accordance with Art. 6 para. 1 sentence 1 lit. f of the GDPR.

Calendar data

The app allows you to enter and remove events, courses and other appointments in the smartphone calendar. You can only use these functions after you have allowed this access to your calendar in a pop-up. You can allow or revoke this feature at any time in the settings of the app or operating system.

The processing of this data is technically required for us to offer these features in the app. If you allow access to this data, the app will only access your data and transfer it to our server as necessary to provide the functionality. Your data will be treated confidentially and deleted if you revoke the rights to use or are no longer required to provide the services and there are no legal retention requirements. The legal basis for this is our legitimate interest in accordance with Art. 6 para. 1 sentence 1 lit. of the GDPR.

Personal Push Messages

The app allows us to send push messages containing personal information, such as Birthday greetings, event reminders, booking confirmations and similar. These messages are processed on our servers and also stored in the app for faster retrieval (cached). You can only use this feature after selecting the appropriate option in the app or operating system settings. You can revoke this feature at any time in the settings of the app or operating system.

The processing of this data is technically required for us to offer these features in the app. The legal basis for this is Art. 6 para. 1 sentence 1 lit. f of the GDPR.

Using the "Refer a Friend" feature

You have the option to advertise membership of our gym via the appropriate feature in the app. If you use this function, we will save your name and e-mail address. We will provide you with a ready-made message via the communication channel you have selected (e-mail, WhatsApp, SMS,

Facebook), which you can then personalize and send directly to your friends. We do not have access to the personal information of your friends when you send this message to them.

The message prepared by us contains a link for your friend. If they click on this link, a tracking code will allow you (the referrer) to be associated with your friend so that you can receive the agreed reward if your friend becomes a member of our gym.

The processing of your data is necessary for us to offer this function. The legal basis is Art. 6 para. 1 sentence 1 lit. f of the GDPR.

Being recruited as a friend

If you are not yet a member of our gym, it is possible that a member has sent you a "friend's offer" from us. This offer includes a link that will allow you to secure your offer and become a member of our gym by making use of your personal offer.

If you wish to do so and click on the link, you will be assigned a tracking code to the advertising member, so that they can get their reward for advertising.

The link will take you to a landing page where you can issue a coupon for the offer. You must enter your contact details such as name, telephone number and e-mail address in the corresponding mask. In order to contact you, we ask for your consent in the context of this application in the contact. Only if you agree to contact us through your opt-in declaration based on this privacy policy will we receive your personal information and use it to contact you.

The legal basis for processing your personal data is your consent in accordance with Art. 6 para. 1 sentence 1 lit. a of the GDPR.

Duration of Storage

Your personal data will be stored for the duration of the respective statutory retention period and routinely deleted thereafter, unless your personal data are still required to achieve the respective purpose of storage (for example, to fulfil the contract or to initiate a contract).

After three years at the latest, we check whether your data is still needed and that deletion violates statutory retention requirements.

Deletion of the account

If you would like to delete your account data, please send a corresponding e-mail to our above mentioned e-mail address.

If you have any queries or complaints in relation to the use of your personal data you can contact the Data Protection Officer for the University as follows:

Data Protection Officer
Secretary's Office, Trinity College Dublin,
Dublin 2, Ireland.
dataprotection@tcd.ie

What are your rights?

You have the following rights over the way we process your personal data.

Right of Access

You have the right to request a copy of the personal data we are processing about you and to exercise that right easily and at reasonable intervals.

Consent

You have the right to withdraw your consent where that is the legal basis of our processing.

Rectification

You have the right to have inaccuracies in personal data that we hold about you rectified.

Erasure

You have the right to have your personal data deleted where we no longer have any justification for retaining it subject to exemptions such as the use of pseudonymised data for scientific research.

Object and Restrict

You have the right to object to processing or restrict the processing of your personal data if:

- The processing is based on public interest or in order to pursue a legitimate interest
- The personal data was processed unlawfully;
- You need the personal data to be deleted in order to comply with a legal obligations;

Portability

Where it is technically feasible you have the right to have a readily accessible machine readable copy of your data transferred or moved to another data controller where we are processing your data based on your consent and if that processing is carried out by automated means.

Contact

If you have any queries relating to the processing of your personal data for the purposes outlined above or you wish to make a request in relation to your rights you can contact:

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If you wish to make a complaint or escalate an issue relating to your rights you can contact the Data Protection Officer at dataprotection@tcd.ie .

Finally if you are not satisfied with the information we have provided to you in relation to the processing of your data or you can also make a complaint to the Data Protection Commissioner via the link in their website [Making a Complaint to the DPC](#).