



# Trinity Sport Privacy Statement

## Introduction

This is a statement of the practices of Trinity Sport, Trinity College Dublin (“**Trinity Sport**”) in connection with the processing of personal data for the purposes of our services and the steps taken by Trinity College Dublin, The University of Dublin (“**Trinity College**” / “**the University**”) as a data controller to safeguard individuals’ rights under data protection legislation, specifically the EU General Data Protection Regulation (“**GDPR**”) and Data Protection Acts 1988-2018.

Trinity Sport fully respects your right to privacy and actively seeks to preserve the data protection rights of individuals who share personal data with the University. Any personal information which you volunteer to Trinity Sport will be treated with the highest standards of security and confidentiality, in accordance with data protection legislation.

This Privacy Statement explains the following

- How Trinity Sport collects your personal data;
- How we securely store your personal data;
- The purpose and legal basis for processing your personal data;
- Details of third parties with whom we share personal data; and
- Your rights under data protection legislation.

## How we collect your personal data

We collect personal data to provide our services to you. This data may be collected directly from you by our staff or from other systems under the control of Trinity College.

## How we securely store your personal data

Personal data will be stored confidentially and securely as required by the Trinity College [Information Systems Security Policy](#) and [Data Protection Policy](#). The University is committed to ensuring that the processing of your data safeguarded by appropriate technical and organisational security measures relevant to the processing in accordance with Article 32 GDPR requirements.

When we store your personal data on our systems the data will be stored either on University premises or on secure IT platforms within the European External Area (“**EEA**”) or external of the EEA which are subject to Chapter V GDPR requirements.



## Purpose and legal basis for processing personal data

The personal data we collect from you will only be processed by Trinity Sport for the specific and lawful purposes as outlined in this Privacy Statement. Trinity Sport will ensure that your data is processed fairly and lawfully in keeping with the principles of data protection as set out under Article 5 GDPR.

Specifically, your personal data may be processed for any or all of the following purposes:

<b>Process</b>	<b>Purpose</b>	<b>Legal basis for processing under GDPR</b>
Receive and review External membership application form.	To process non TCD students as members.	The use of the data is necessary for the performance of a contract to which the member is party.
Marketing and Promoting Trinity Sport - Using membership contact details for promotions, marketing and important member communications.	Contact information required for communications purposes.	The use of the data is necessary for the performance of a contract to which the member is party.  The member has consented to receiving marketing communications.
Arrange and deliver children's Multi-sport camps that take place during school mid-terms and during summer.	Application made by parent/guardian, to attend programs designed for children.	The use of the data is necessary for the performance of a contract to which the member is party.
Hire of sport facilities, equipment & instructors to both internal and external parties.	To hire a particular sports facility for both internal and external parties.	The use of the data is necessary for the performance of a contract to which the member is party.
Provide Beginner Exercise Programmes / Health Promotion initiatives.	Contact information required for communication.	The member has consented to the processing.  The use of the data is necessary to protect the vital interests of the member or of another natural person.
Deliver Sporting aspect of the TCPID Module for School of Education to students in TCPID.	For roll call/attendance purposes.	The processing is necessary for Trinity College to perform a task for the purpose of its statutory functions.
Sports scholar application process.	Sport scholar selection process.	The member has consented to the processing.



<b>Process</b>	<b>Purpose</b>	<b>Legal basis for processing under GDPR</b>
Campus participation events such as annual Campus 5km run.	Registration for participants as events could be capped, contact details for communication. Also for timing system to have accurate results.	The use of the data is necessary for the performance of a contract to which the member is party.
Recruiting and training Volunteers for support of programmes such as campus 5km stewarding.	To train volunteers to ensure standards of volunteering are at the required standard. EG Health & Safety and Communications training.	The processing is necessary for compliance with a legal obligation to which Trinity College is subject.
Performance Pathway athletes - To provide physical performance, academic and mental health support utilising electronic platforms.	Performance development and support.	The use of the data is necessary for the performance of a contract to which the member is party.
Student and staff data migration from College IT systems	Details required and migrated overnight from College IT systems, for communication purposes and health and safety. To allow participation of TCD registered students and staff in all of the Trinity Sport Activities.	The use of the data is necessary for the performance of a contract to which the member is party.
Designing and providing an individual exercise programme card/s.	To allow specific exercises to be prescribed to suit each individual. This data is collected as an identifier for each individual's exercise prescription, to allow them be guided throughout their exercise routine.	The use of the data is necessary for the performance of a contract to which the member is party.
Prepayment for membership	Processing payment to cover full membership cost.	The use of the data is necessary for the performance of a contract to which the member is party.



## Details of third parties with whom we share personal data

The Service will only share your data with third parties where necessary for the purposes of processing outlined in this Privacy Statement. In accordance with Article 28 GDPR, when we share your data with third parties, Trinity Sport will ensure that the data is processed according to specific instructions and that the same standards of confidentiality and security are maintained.

The following table details the third parties with whom your personal data is shared together with the purposes for the sharing:

Gladstone	Account administration.
Microsoft	General administration using Office 365.
Mailchimp	Marketing and promotional activities.
CORE HR	Staff membership administration.
Elavon	Membership payment services.
Kitman Labs	Performance Pathway athletes - development and support.

## How long we retain your data

In keeping with the data protection principle of storage limitation we will only retain your data for as long as is necessary. For the purposes described in this Privacy Statement we will store your data for a defined period of time in accordance with the Trinity College [Records Management Policy](#).

## Your rights under data protection law

You have the following rights over the way we process your personal data. For further information please see the Trinity College [Data Subject Rights Requests Procedure](#).

### Right of Access

You have the right to request a copy of the personal data which is processed by Trinity Sport and to exercise that right easily and at reasonable intervals.



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### Consent

You may withdraw your consent to Trinity Sport processing your personal data at any time, when consent is the legal basis for the processing. To withdraw your consent, we require you to advise Trinity Sport in writing.

### 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 or anonymised data for scientific research purposes.

### Object

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

- We have processed your data based on a legitimate interest or for the exercise of the public tasks of the University if you believe the processing to be disproportionate or unfair to you.
- The personal data was processed for the purposes of direct marketing or profiling related to direct marketing.
- We have processed the personal data for scientific or historical research purposes or statistical purposes unless the processing is necessary for the performance of a task carried out for reasons of public interest.

### Restriction

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

- You are contesting the accuracy of the personal data.
- The personal data was processed unlawfully.
- You need to prevent the erasure of the personal data in order to comply with legal obligations.
- You have objected to the processing of the personal data and wish to restrict the processing until a legal basis for continued processing has been verified.



## Trinity Sport Privacy Statement

### 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.

### Cookies

We use information gathered from cookies to help improve your experience of our website. Some cookies are essential so you can move around the website and use its features. Our website also contains third party cookies which are listed in our [Cookie Register](#). You can refuse or consent to third party cookies when you first visit our website or by following the guidelines in our [Cookie Policy](#).

### Further information

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 Trinity Sport at: [sport@tcd.ie](mailto:sport@tcd.ie).

If you wish to make a complaint or escalate an issue relating to your rights you can contact the Trinity College Data Protection Officer:

Email: [dataprotection@tcd.ie](mailto:dataprotection@tcd.ie)

Post:

Data Protection Officer  
Secretary's Office,  
Trinity College Dublin,  
Dublin 2,  
Ireland.

Oifigeach Cosanta Sonraí  
Oifig an Rúnaí,  
Coláiste na Tríonóide, Baile Átha Cliath,  
Baile Átha Cliath 2,  
Éire.

If you are not satisfied with the information we have provided to you in relation to the processing of your personal data or you are dissatisfied with how Trinity College is processing your data you can make a complaint to the Data Protection Commissioner at:

<https://forms.dataprotection.ie/contact>.



## **Definitions**

### **Personal data**

Any information relating to an identified or identifiable natural person ('data subject').

### **Special Categories of Personal Data (Sensitive personal data)**

- Data concerning health
- Personal data revealing racial origin, ethnic origin, political opinions, religious beliefs, philosophical beliefs, trade-union membership
- The processing of genetic data for the purpose of uniquely identifying a natural person
- The processing of biometric data for the purpose of uniquely identifying a natural person
- Data concerning a natural person's sex life or sexual orientation

### **Processing**

Any operation or set of operations performed on personal data. Processing includes storing, collecting, retrieving, using, combining, erasing and destroying personal data, and can involve automated or manual operations.

### **Data subject**

Someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### **Data controller**

An organisation, such as Trinity College, which determines the purposes and means of the processing of personal data.

### **Data processor**

A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller, traditionally under contract. This does not include Service staff who are processing personal data on behalf of the University as part of their employment duties.

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