



RDA Ireland Data Protection Privacy Notice

General Data Protection Regulation EU 2016/670, effective 25th May 2018.

This Data Privacy Notice sets out how RDA Ireland (RDAI) uses and protects any information that volunteers, clients, suppliers, contractors and persons in our care give to RDAI via any communication methods.

Who we are

1. RDA Ireland is a registered charity (CHY 6534) and is regulated by the Charities Regulatory Authority (CRA No. 20012243). RDAI is committed to ensuring that individuals' privacy and data are protected in compliance with all Data Protection rules and regulations.

The categories of personal data we collect

2. The following is a non-exhaustive list of the types of data we may collect from our volunteers, clients, suppliers, contractors and persons in our care:
 - (a) Your name and contact information such as your home and/or business address, email address and telephone number;
 - (b) Identity and biographical information including your nationality, date of birth, information relevant to Garda Vetting and Clearance, and other information relevant to our provision of our services;
 - (c) Such personal, medical and other information, as is referred to in our Application Form for Riders and Carriage Drivers.

How that personal data is collected

3. We may collect your personal data, or you may provide it to us through various means including from information
 - (a) you provide to us when you meet us;
 - (b) about you provided to us by your organisation, agents, advisers, intermediaries;
 - (c) provided to us by our clients;
 - (d) you communicate to us by telephone, post, email or other form of electronic communication. In this respect we may monitor, record and store any such communication;
 - (e) collected when you complete (or we complete on your behalf) engagement formalities or register for an event with us;
 - (f) drawn from publicly available sources or from third parties, for example when we need to conduct background checks about you;
 - (g) collected via closed circuit television monitoring and/or
 - (h) collected otherwise in the normal course of providing our services.

Our basis for processing your personal data and how we use that data

4.1 How we use your personal data will depend on whether you are a client, a representative of a client, volunteer, third party supplier, or someone whose personal data we necessarily process as part of our provision of our services, or otherwise. We may process your personal data for the following purposes:

- (a) providing the services we offer and for client engagement purposes (including the carrying out of background checks);
- (b) managing our relationship with you and/or our clients, for record-keeping purposes and more generally for the proper operation of RDAI;
- (c) dealing with any complaints or feedback you may have;
- (d) monitoring and improving the performance and effectiveness of our services, including by training our volunteers;
- (e) any other purpose for which you provide us with your personal data;
- (f) seeking advice on our rights and obligations, such as where we require our own legal advice, and to exercise and defend our legal rights;
- (g) compliance with our legal and regulatory obligations (which may include the carrying out of background checks and retention of a record of such checks), data protection laws, and/or to assist with investigations by police and/or other component authorities (where such investigation complies with relevant law) and to comply with Court orders;
- (h) safeguarding the security of our systems and communications; and/or
- (i) for security purposes generally and to ensure the safety of our clients, volunteers and visitors.

4.2 We may process your personal data for any of the purposes set out above where one (or more) of the following lawful processing grounds applies:

- (a) the processing is necessary to perform a contract with you, or take steps at your request before entering into a contract with you;
- (b) the processing is necessary for us to comply with our legal obligations;
- (c) the processing is necessary for our legitimate interests (including the operation of RDAI, and the provisions of our services) or those of any client or relevant third party, unless those legitimate interests are overridden by your interests or fundamental rights or freedoms; and/or
- (d) you have consented to the processing in question.

4.3 Where we process sensitive personal data, other lawful processing grounds may apply, such as that the processing is necessary for the establishment, exercise or defence of legal claims, or for reasons of substantial public interest; or where you have given us your explicit consent.

Who we may share your data with

5. We may share your personal data with:

- (a) third parties we engage to assist in providing our services, for example, in carrying out background checks/Garda Vetting for processing in accordance with our obligations as well as other professional services firms, such as lawyers, IT and other consultants;
- (b) our own legal and professional services providers and insurers, where appropriate;
- (c) Courts and other authorities in connection with the enforcement of defence of legal rights and provision of our professional services.

How long we will hold your personal data for

6. We will retain your personal data for as long as is necessary to fulfil the purposes set out in this Privacy Notice and in compliance with our own legal obligations.

Your rights

7.1 Under GDPR you have the right to:

- (a) obtain access to, and copies of, the personal data we hold about you and information about how we process it;
- (b) require us to correct any inaccuracies in the personal data we hold about you;
- (c) require, in certain circumstances, erasure of your personal data;
- (d) require us, in certain circumstances, to restrict our data processing activities;
- (e) obtain from us the personal data you have provided to us in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- (f) object to our use of your personal data based on our legitimate interests, on grounds relating to your specific situation;
- (g) withdraw your consent, where our use of your personal data is based on that consent, and
- (h) complain to the Data Protection Commissioner's Office, which can investigate compliance with the data protection law and has enforcement powers, if you are not satisfied with how we are processing your personal data.

7.2 Please contact us in writing using the contact details below if you would like to action any of your rights above. You should note that these rights are not absolute, and we may be entitled (or required) to refuse requests where exceptions apply.

Changes to this Privacy Notice

8. We may update this Privacy Notice in line with changes to how we process personal data. We will publish any new version of the Privacy Notice on our website, and where appropriate, will provide you with a copy.

How to contact us

9.1 Responsibility for compliance with Data Protection lies with our organisation, not with any specific individual. The Trustees as a whole body will be responsible for keeping up to date with any developments, to check that RDAI is complying and have evidence to prove it, and to handle any issues such as a data breach or a Subject Access Request. The Trustees may designate someone to be the lead person.

9.2 If you have any queries about this Privacy Notice or how we process your personal data, you can contact us at rdaisecretary@gmail.com or by post to RDA Ireland (Data Protection) c/o Horse Sport Ireland, Beech House, Millennium Park, Naas, Co. Kildare.

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