

## **Privacy Notice for Athletes**

### **Who We Are**

Sport Ireland ('we', 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant Data Protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Sport Ireland's Head Office is at The Courtyard, Sport Ireland Campus, Snugborough Road, Dublin 15 and is a statutory authority that plans, leads and coordinates the sustainable development of competitive and recreational sport in Ireland. Sport Ireland acts as the Data Controller when processing your data. If you have any questions or concerns, please contact the Sport Ireland Data Protection Officer (see contact details on p7).

The Sport Ireland Institute is a division of Sport Ireland providing performance support services to Irish high performance athletes, talent pathway athletes and support personnel.

### **Information That We Collect**

In accordance with relevant laws, namely the Data Protection Act 2018 and the GDPR which entered into force in EU Member States as of 25<sup>th</sup> May 2018, Sport Ireland Institute processes your personal information to meet our legal, statutory and contractual obligations and to provide you with services. We will never collect any unnecessary personal data from you and do not process your information in any way other than as specified in this notice.

Dependent on the services you receive, the types of personal data that we process include: -

- Name
- Date of Birth
- Home Address
- Personal Email
- Business Email
- Home Telephone Number
- Mobile Telephone Number
- Car Registration Number (for security access to National Sports Campus)
- Sports science, physical performance-related data
- Life-skills and professional development data
- Injury and illness history
- Medication and vaccination history
- Treatment history
- Video footage

### **We collect information in the below ways: -**

Directly from you, such as information you provide when you interact with the staff of the Institute, from online or paper applications, surveys and questionnaires, information provided when you communicate with the Institute by telephone, email or via our website to make enquiries or raise concerns and in various other ways as you interact with the Institute;

- From necessary and relevant third parties - such as from National Governing Bodies; Olympic Federation of Ireland and Paralympics Ireland.
- CCTV is used in the Institute building for security purposes only.
- Video footage may be taken during some activities such as nutrition workshops, training sessions and for athletic performance analysis.

### **How We Use Your Personal Data (Legal Basis for Processing)**

Sport Ireland Institute takes your privacy very seriously and will never disclose, share or sell your data without your consent unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice.

We have a professional, duty of care obligation to process and share your data with other support professionals on the legal basis of providing appropriate health and wellbeing care.

We collect your personal data for one or more specific purposes being connected to Sport Ireland Institute, on the basis of public interest and under lawful authority to fulfil the duties as a nationalised sports service agency and official authority “to support elite athletes in achieving excellence in sport” (Sport Ireland Act, 2015). The purposes and reasons for processing your personal data are detailed below: -

- Administrative purposes, such as arranging support appointments and meetings
- Maintenance of service recipient science and medicine support services records
- Facilitate high standards and levels of support
- Delivery of efficient services to meet sports needs
- Communicating with service recipients and NGBs to advise of new Institute support available and training opportunities
- Safeguarding and promoting the welfare of athletes
- Recording and communicating the activities of the Institute to stakeholders
- Facilitating future contact with athletes
- In order to comply with a legal obligation
- If processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

### **Your Rights**

You have the right to access any personal information that Sport Ireland Institute processes about you and to request information about:-

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible, unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use. We do not currently use automated decision-making software.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

To exercise your rights, contact the Data Protection Officer (contact details on page 7).

### **Sharing and Disclosing Your Personal Information**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. Sport Ireland Institute uses necessary Third Parties to provide the below services and operational functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

- Athlete Management System
- Online Appointments Platform
- SurveyMonkey
- Dropbox
- Service-specific support data and data sharing systems, such as Nutritics, Goalscape, MuscleSound, Dartfish, SAS Visual Analytics, etc.
- Microsoft applications such as Outlook and OneDrive
- Other programmes and applications used for purposes of delivering and facilitating support, and communicating with athletes and sports.

Sport Ireland Institute's High Performance Centre is designed to deliver an integrated, multidisciplinary support service to athletes and coaches across a range of medicine, science and life-

skills disciplines. This is to ensure the greatest impact on the athlete's performance, the optimal management of any injury / illness and to minimise the time out of training and competition.

In order for the multi-disciplinary team to work in an integrated and coordinated way, it is necessary for information relevant to athletic performance, including special category data, being disclosed between healthcare professionals and the performance team who are involved in your performance care. All sports science, life-skills and medical information about you is confidential. This information will only be shared to provide the best possible care and in situations where sharing information with an appropriate person / body is required by the ethical guidelines of the service provider, (e.g. if directed by a court of law).

Sport Ireland Institute operates a, "confidentiality net" system in which science, life-skills and medical information about you is kept within the bounds of a specific network of professional staff. There are four "nets" within which information about you may be shared:

1. Sport Ireland Institute Staff
2. Designated Science and Medical staff, e.g. from your sport or appropriate event/Games Science, Medical, or support personnel
3. Performance Director, Coaches and Management staff in your sport or appropriate event/Games Science, Medical, or support personnel
4. Olympic Federation of Ireland or Paralympics Ireland

**Information will be exchanged with staff relevant to your athletic performance only** and all members of the team are aware of the confidential nature of the information being exchanged but not all are bound by rules of confidentiality. Sharing information with your Performance Director, Coaches and Management staff of your sport will be limited to that information which has significance to your athletic performance and ability to compete.

You have the right to request that specific information is not shared across the networks of professional staff but, unless you make a specific, written request for such confidentiality, we will share information about you within these networks in order to provide you with the best possible support.

If you have sought "outside" medical or science advice, it is important that any relevant information from these consultations be available to the Institute's Science and Medical staff. This is necessary to ensure optimal medical care and continuity of care. Please make sure that you obtain a copy of the notes and pass them on to the Institute's medical team. Alternatively, you could ask the outside professional to contact the Institute medical team directly, however, specific consent in writing from the athlete must be received before the Institute can provide information to outside the "confidentiality net".

The rights of access to personal data will be strictly limited and controlled by Sport Ireland Institute. If you have any questions or concerns, please contact the Sport Ireland Data Protection Officer.

### **Transfers of Personal Data Outside the European Economic Area (EEA)**

Under Data Protection Law (Chapter 5 GDPR and Recital 101), Sport Ireland Institute (subject to exceptions below) may not transfer personal data outside of the EEA to any third party country, unless that third country is deemed by the European Commission to provide an adequate level of protection to the processing of personal data. Exceptions include:

- (i) the transfer of personal data is required or authorised by law
- (ii) the data subject (i.e. the individual to whom the personal data relates) has given his or her consent to the transfer
- (iii) the transfer is necessary for the performance of a contract to which the data subject is party; or the transfer is necessary for the taking of steps – at the request of the data subject – with a view to his or her entering into a contract with the data controller
- (iv) the transfer is necessary to conclude a contract (or to perform a contract) between the data controller and someone other than the data subject, in cases where the contract is entered into at the request of the data subject, or where the contract is in the interests of the data subject
- (v) the transfer is necessary for reasons of substantial public interest
- (vi) the transfer is necessary for obtaining legal advice or for legal proceedings
- (vii) the transfer is necessary to prevent injury or other damage to the data subject's health, or to prevent serious damage to his or her property, or to protect his or her vital interests in some other way – provided that it is not possible to inform the data subject, or obtain his or her consent, without harming his or her vital interests
- (viii) the data importer is subject to a framework approved by the European Commission to facilitate transfers (e.g. EU-US Privacy Shield).

### **Safeguarding and Data Security Measures**

Sport Ireland Institute takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including measures such as including but not limited to:

SSL, TLS, encryptions, pseudonymisation, restricted access, IT authentication, firewalls, anti-virus/malware.

### **Consequences of Not Providing Your Data**

You are not obligated to provide your personal information. However, the Sport Ireland Institute requires to collect and process data to meet its legal, statutory and contractual obligations and services cannot be provided without it.

### **How Long We Keep Your Data For**

Sport Ireland Institute only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under HSE records retention policy (Record Retention Periods, Health Service Policy, 2013, HCR23) to keep healthcare records for a period of 8 years after conclusion of treatment, after which they will be destroyed securely.

Where you have consented to us using your details for promotional/newsletter purposes, we will keep such data until you notify us otherwise and/or withdraw your consent via a clearly recognisable unsubscribe link .

### **Special Categories Data**

Owing to the services and treatments that we offer, Sport Ireland Institute sometimes needs to process sensitive personal information (known as special category data) about you, to provide you with medical services that are beneficial to elite athletes. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and on the basis that processing is necessary for the purpose of preventative and occupational medicine.

## **Frequently Asked Questions**

### **Who can access my records?**

The data can only be accessed by authorised Sport Ireland Institute Science and Medical staff and designated staff in your sport, Olympic Federation of Ireland or Paralympics Ireland using unique logins (username and passwords).

### **Can I access my records?**

An athlete can access a copy of the information stored on the system about themselves. If an athlete wants a copy of their records they should contact the Sport Ireland Data Protection Officer (contact details on page 7).

### **What happens if I go to an “outside” medical or science professional?**

If an athlete goes to an outside medical or science professional, he/she should obtain a copy of the notes and ensure that these are passed on to the Institute's medical team. Alternatively, the athlete can ask the outside professional to contact the Institute medical team directly, however specific consent in writing from the athlete must be received before the Institute can provide information to outside the “confidentiality net”.

### **Is the Information used for any other purpose?**

Information collected may be used anonymously for ongoing research and audit purposes. The rationale for this is to enable the sport and the Institute to set up systems that best support the medical and science needs of the athletes and to educate the medical and science teams in the areas

relevant to injuries/illnesses. This will ultimately enhance the quality of medical and science care received by the athlete

### **Can I withdraw my records from the system?**

You may withdraw your records at any time, or data can be withheld in respect of any part of an athlete's personal information. The athlete needs to make a written request to the Sport Ireland Data Protection Officer (contact details below). As a level of processing of personal data is necessary in the delivery of support, this will restrict the support that the Institute can provide.

### **Contact**

If you have any further queries please contact the Sport Ireland Data Protection Officer:-  
Cian Spillane

Data Protection Officer  
Sport Ireland  
The Courtyard  
National Sports Campus  
Snugborough Road  
Dublin 15

Tel: 01 8608846

Email: [cspillane@sportireland.ie](mailto:cspillane@sportireland.ie)

### **Complaints**

If you are dissatisfied with a response that you receive with regard to data privacy, you have the right to make a complaint to the Data Protection Commissioner who is the Supervisory Authority for data protection matters in Ireland:

Data Protection Commissioner  
Canal House  
Station Road  
Portarlinton  
Co Laois  
R32 AP23

Lo Call: 1890 252 231

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

### **Updates**

Sport Ireland Institute will occasionally update this policy.

We would recommend that you review this policy periodically and would ask that you advise us of any changes to your personal data so that we can ensure that it is accurate and up to date.