



# Privacy Policy

## Speleological Union of Ireland



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# Privacy policy

This privacy policy tells you what to expect when the Speleological Union of Ireland (SUI) collects personal information.

We may change this policy by updating this page. You should check from time to time to ensure that you are happy with any changes.

This policy is effective from 25 May 2018.

## Introduction

SUI is committed to processing personal information in a way that is fair, transparent and meets its legal obligations in accordance with Data Protection Acts and the General Data Protection Regulations (GDPR).

## Data protection principles

Data protection legislation sets out various data protection principles. These include that personal information is:

- Used fairly and lawfully
- Used for limited, specifically stated purposes
- Used in a way that is adequate, relevant and not excessive
- Accurate
- Kept for no longer than is absolutely necessary
- Kept safe and secure
- Not transferred outside the European Economic Area without adequate protection

## Your rights

The legislation conveys various individual rights. These include the following:

- The right to be informed
- The right of access
- The right to rectification
- The right to erase
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

The sections towards the end of this Privacy policy let you know how you can exercise your rights.

## Information SUI processes

The following sections describe the information that SUI collects and how it is processed. The sections are split according to the type of information.

### **Legal basis for processing**

Legislation requires that there is a clear legal basis for processing personal information.

In general SUI relies on the individual's consent in order to process their data. Where there are exceptions such as a legal obligation, contractual agreement or SUI's legitimate interest, they will be noted.

Please note that if consent is withdrawn the level of service that SUI can offer you is likely to be severely curtailed.

## Members

We collect personal details in order to provide membership services. This includes for the purpose of (but not limited to) the administration of joining and renewals, distribution of publications, organising events, organising training courses and arranging insurance.

The key data collected for the purpose of SUI membership and arranging insurance includes:

- Name
- Gender
- Date of birth
- Home address
- Phone number
- Email

Other data may be collected for the purpose of administering extended membership features, including:

- Caving courses undertaken
- Caving qualifications
- Caving club membership
- ICRO membership
- FFS membership
- BCA membership

### **Email**

We use members' emails for communication about SUI membership matters, e.g. notification of AGM/EGM, insurance, membership renewal, events and training.

We do not allow members' emails to be used for external marketing/advertising without your consent.

#### *Data Retention*

Once a member lapses, we retain sufficient information to identify the previous member. This allows the previous membership number to be used again if the member re-joins. SUI relies on legitimate interest as the legal basis for retaining this information.

#### **Training**

We collect and hold information to administer the taking of qualifications and issuing of certificates to successful candidates. We will hold the certificate information indefinitely so that we can validate its is genuine in response to legitimate queries.

#### *Data retention*

SUI relies on legitimate interest as the legal basis for retaining certificate information.

#### **Irish Cave Rescue Organisation**

In the event of a rescue or legitimate requirement, SUI may share member information with the Irish Cave Rescue Organisation as a rescue tasking body.

SUI may not share your information with ICRO in other instances, unless members opt-in to sharing via the online membership system.

#### **Web and online**

Personal details are collected when someone visits our website (e.g. [www.caving.ie](http://www.caving.ie)) and via social media, e.g. Facebook, Twitter. We use some third party services (Google Analytics, Statcounter) to collect standard internet log information and details of visitor behaviour patterns.

We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

If you wish to engage with SUI via social media, you should familiarise yourself with the privacy policies of those organisations.

## **Forms**

There are various forms on the website used to collect information. That information is only used for the stated purposes which are described in the relevant sections of this Privacy policy.

## **Links to other websites**

This Privacy policy does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

## **Suppliers / 3rd parties**

### **Use of data processors**

Data processors are third parties who provide services for us. They have no legal standing to do anything with your personal information unless instructed by SUI. They will not share your personal information with any organisation apart from SUI. They will hold your personal information securely and retain it for the period we instruct. The following is a list of our main data processors. Others may be added from time to time.

#### *Azolve online membership system*

We use a third party service (Azolve) to host our member service. Azolve is obliged to treat SUI information as confidential and only use such information for the purpose of providing SUI and SUI members with members services.

To learn more about how Azolve processes your information go to <https://sui.azolve.com/>

#### *Website hosting*

We use a third party service to host our website. They are obliged to treat any information on our private website as confidential and only use such information for the purpose of providing SUI with web hosting.

#### *Paypal*

Where PayPal is used to take payments, only sufficient information to complete the purchase is shared with PayPal.

SUI does not see nor retain your credit card details since these are handled by PayPal.

To learn more about how PayPal processes your information go to <https://www.paypal.com/en/webapps/mpp/ua/privacy-full>

### *Stripe*

Where Stripe is used to take payments, only sufficient information to complete the purchase is shared with Stripe.

SUI does not see nor retain your credit card details since these are handled by Stripe. To learn more about how Stripe processes your information go to <https://stripe.com/ie/privacy>

### *Email and productivity services*

We use services from Google (e.g. Gmail email service, Google Docs platform) for aspects of committee business. To learn more about how Google processes your information go to <https://cloud.google.com/security/gdpr/resource-center/>

### *Additional*

Sometimes we share your information with reliable third parties. This includes tasking bodies in the event of a rescue or legitimate requirement, i.e. An Garda Síochána, Police Service of Northern Ireland.

We encourage you to read the privacy statements of these organisations to familiarise yourself with how they manage data protection.

## **Insurance**

We assume member consent to share personal details for the administrative purpose of acquiring insurance from the British Caving Association (BCA) and Fédération Française de Spéléologie (FFS) based on the membership type purchased.

The information shared is the minimum required by those agencies for processing:

- **Basic membership:** We share information with BCA only.
- **Full membership:** We share information with BCA and FFS.



Learn more about how BCA processes your information [http://british-caving.org.uk/wiki3/doku.php?id=about:documents:privacy\\_notice&s\[\]=gdpr](http://british-caving.org.uk/wiki3/doku.php?id=about:documents:privacy_notice&s[]=gdpr) and how FFS processes your information at <https://www.ffspeleo.fr/>

## International Data Transfers

Your personal information will be stored by SUI in the EU and in accordance with the GDPR.

The GDPR applies to EU residents. If we share personal information of EU residents with suppliers or 3rd parties outside of the EU we will ensure that they meet the requirements of the GDPR.

We are committed to complying with the data regulations of non-EU residents according to their jurisdiction.

## Data Security

SUI has implemented technical and organisational security measures to protect your personal data against unauthorized access, loss or misuse.

## Complaints or queries

SUI tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously.

We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy policy does not provide exhaustive detail of all aspects of SUI's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

Confidentiality will be preserved during the investigation of a complaint to safeguard the interests of everyone concerned unless disclosure is necessary to progress the complaint.

If you want to make a complaint about the way we have processed your personal information, please contact us in writing to the address provided below.

## Access to personal information

SUI tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by asking. If we do hold information about you we will:

- Give you a description of it
- Tell you why we are holding it
- Tell you who it could be disclosed to
- Let you have a copy of the information in an intelligible form

To make a request to the SUI for any personal information we may hold you need to put the request in writing to the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes.

We may make a minimum charge (based on the law) for any request.

## Disclosure of personal information

Except as described in this Privacy policy we will not disclose personal data without consent.

## **Legal Obligation**

We may disclose your information to governmental agencies or entities, regulatory authorities, or other persons in line with any applicable law, regulations, court order or official request.

## **How to contact us**

Email the SUI Secretary at [secretary@caving.ie](mailto:secretary@caving.ie).



Feedback, queries, comments?

[info@caving.ie](mailto:info@caving.ie)