



Table Tennis Ireland Data Protection Policy

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Directorate:	TTI Board of Directors	Approved by Board:	16th December 2024
Reviewed:	December 2024	Change History	Review due Dec 2027

Purpose of the Policy

Table Tennis Ireland has legal obligations in respect of the way it obtains, retains, uses, and discloses personal data relating to employees, officers, volunteers, members and any other related individuals (e.g. contractors, consultants, suppliers or other third parties). Table Tennis Ireland operates across two jurisdictions: the Republic of Ireland and Northern Ireland. As such, we are committed to complying with the data protection laws applicable in each jurisdiction. These include:

- The EU General Data Protection Regulation (EU GDPR) and the Data Protection Act 2018 for the Republic of Ireland.
- The UK General Data Protection Regulation (UK GDPR) and the UK Data Protection Act 2018 for Northern Ireland.

- Outline the legal requirements and principles of data protection.
- Provide practical guidance on the responsibilities of data processors to ensure compliance with data protection laws.
- Specify what the rights of an individual are.
- Safeguard the reputation of the Association.

Please note that this policy is not meant to be a summary of Data Protection Law (1988-2018) or an exhaustive list of data responsibilities.

In all cases it must ensure that data is processed in compliance with the 6 GDPR Principles:

- Lawfulness, Fairness and Transparency.
- Purpose Limitation.
- Data Minimisation.
- Accuracy.



- Storage Limitation.
- Accountability, integrity and confidentiality.

Compliance Framework:

Data processing activities involving individuals in the Republic of Ireland are governed by EU GDPR and overseen by the Irish Data Protection Commission (DPC).

Data processing activities involving individuals in Northern Ireland are governed by UK GDPR and overseen by the UK Information Commissioner's Office (ICO).

Table Tennis Ireland's policies and practices are designed to meet the requirements of both legal frameworks.

Definitions

Below are definitions of some important terms used in data protection.

Data Subject is the living individual, to whom the personal data relates to, and may be identified from that data.

Personal data means data relating to Data Subject, on its own or in conjunction with other data that is in the possession of Table Tennis Ireland.

- a) This information can be held on paper, electronically, visually (e.g. CCTV) or provided orally (e.g. phone).
- b) Information can include contact details, medical records or credit history.

Sensitive personal data means personal data relating to a living individual:

- (a) the racial or ethnic origin, the political opinions or the religious or philosophical beliefs of a data subject.
- (b) whether the data subject is a member of a trade union.
- (c) the physical or mental health or condition or sexual life of the data subject.
- (d) the commission or alleged commission of any offence by the data subject ~~or of~~
- (e) any proceedings for an offence committed or alleged to have been committed by the data subject, and the outcome of those proceedings.

Data Protection Law means all legislation, regulations and applicable codes of practice relating to the processing, protection and privacy of Personal Data.

Approved Systems covers any of the designated methods of data storage approved by the Board of Table Tennis Ireland. These include any online system used by the association, laptops and hard drives of the Directors and employees and hard copies of records which may be required.

Security of data means that all electronic data should be password protected, and all printed or written hard copies of data should be secured when unattended.

Processing is defined under the Data Protection Laws and can include collection, modification, transfer, viewing, deleting, storage, back up, archiving, retention, disclosure or personal data and images.



Data Controller is the person who decides how personal data is used and what data is processed

Data Processor is the person who processes personal data on behalf of Table Tennis Ireland

Key Principles

All Table Tennis Ireland employees, officers, volunteers, members and any other related individuals (e.g. contractors, consultants, suppliers or other third parties) will adhere to the following data protection principles:

- Obtain and process data fairly and lawfully.
- Retain it only for one or more specified, explicit and lawful purpose.
- Use and disclose it only in ways compatible with these purposes.
- Keep it safe and secure, taking all appropriate measures against unauthorised or unlawful access to personal data. Electronic data should be password protected, and hard copies secured when not attended.
- Keep it accurate and up to date.
- Ensure that it is adequate, relevant and not excessive.
- Retain it for no longer than is necessary for the specified purpose or purposes.
- Give a copy of his/her personal information to the individual, on request.
- Transfer of personal data outside the European Union unless that country ensures an adequate level of protection.

Data Collection

We may collect the following information about you through our memberships and event systems and/or our digital media platforms:

- Name.
- Postal Address.
- Email Address.
- Contact Number.
- Date of birth.
- Passport details.
- Your IP address (which is a unique identifier that computers and devices used to identify and communicate with each other) which is automatically recognised by the web server.
- Visually (e.g. photographs, filming or recording).

Data Transfers Across Jurisdictions

To facilitate national operations, Table Tennis Ireland may transfer personal data between the Republic of Ireland and Northern Ireland. All such transfers will comply with:

1. The EU-UK adequacy decision, which currently permits the free flow of personal data between the



two jurisdictions.
2. Any future regulatory updates or changes to adequacy agreements. Table Tennis Ireland will take appropriate safeguards to ensure data security during cross-border transfers.

How we use your information

We may use your personal information for a number of purposes, including:

- Dealing with your enquiries.
- Managing and processing your membership account.
- Processing entries for national and international events and training camps.
- Running table tennis programmes and projects.
- Use of visual data (e.g. photographs, filming or recording) for digital and print media.
- Notify you about table tennis and related events.
- Your IP address for gathering browsing behaviours of visitors to our digital media
- Please refer to our Cookie and Privacy policies for further details. These can be accessed on our website.

Disclosure of Personal Information

Table Tennis Ireland will only disclose personal data to third parties if the data subject has consented to such disclosure, if Table Tennis Ireland is entitled to do so for legitimate purposes or is obliged to do so under law. We will only share data what is required for those purposes. Table Tennis Ireland will ensure that any third party have adequate processes in place to protect the security of your data. The data we collect from you may be transferred to a destination external of Table Tennis Ireland's own secure network. We will not transfer your data outside of the European Union.

Consent

By submitting your data to us, you agree to the transfer, storing or processing of it. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this policy. You can withdraw your consent at any time by contacting us directly by phone or email.

Phone: 01-6251135

Email: CEO@tabletennisireland.ie

Under Data Protection legislation (1988-2018), you are entitled to see any personal data which we hold about you. Such requests are deemed subject access requests. You will be required to provide identification as proof of identity. Examples of identification are driver's licence, passport or a utility bill. Table Tennis Ireland will respond within 30 days to your subject access request.

Data Retention



Any data which we collect from you will be deleted within three years of you not playing an active part in table tennis activities.

Policy Monitoring and Escalation

Given the evolving nature of data protection regulations, Table Tennis Ireland will:

- Regularly review compliance with both EU GDPR and UK GDPR.
- Monitor developments in the EU-UK adequacy framework and adjust processes accordingly.
- Update this policy as necessary to reflect changes in data protection law or practice.

Table Tennis Ireland has a zero-risk appetite for data protection policy breaches. Any unauthorised or unlawful processing of data, including unauthorised access to, or alteration, disclosure or destruction of, the data and accidental loss, potential loss or destruction to personal data is a breach and must be immediately reported to the Board of Directors.

Appropriate corrective action will be taken, including escalation to the office of the Data Protection Commission where such breaches are deemed appropriate. Table Tennis Ireland will deal with regulatory authorities and law enforcement agencies in an open, transparent and co-operative manner.

In the event of a data breach, Table Tennis Ireland will adhere to the following procedures:

- Breaches involving individuals in the Republic of Ireland will be reported to the Data Protection Commission (DPC).
- Breaches involving individuals in Northern Ireland will be reported to the Information Commissioner's Office (ICO).

An internal breach management policy will guide the process to ensure swift and appropriate responses to incidents.

Responsibility

The Board of Directors is responsible for ensuring that Table Tennis Ireland meets the requirements of Data Protection legislation (1988-2018). The Board will ensure that appropriate processes and systems are in place to all employees, officers, volunteers, members and any other related individuals (e.g. contractors, consultants, suppliers or other third parties) processing data. This policy will be reviewed at least every three years by the Board, or more often as relevant law, regulation or practice dictates.

This policy has been endorsed by the Board of Directors at Table Tennis Ireland, and signed by the Chair on behalf of the Board of Directors:



____ Approved _____

Arnold Morgan (Chair)

Date: December 2024