



**FOOTBALL ASSOCIATION OF IRELAND**  
**PRIVACY NOTICE**

**1. INTRODUCTION AND PURPOSE**

The FAI is committed to achieving the highest standards of accountability and excellence in respect of data collection and data usage.

The FAI respects your privacy rights and is committed to protecting your personal data when shared with us during any interaction with the FAI via any of the various channels. This privacy notice will inform you as to how we use your personal data when received, when you visit any of the FAI Websites (regardless of where you visit it from), when you engage with the FAI for any purpose, to include purchasing merchandise, courses, general participation and membership. This policy intends to inform you about your privacy rights and how the law protects you.

Reference to your personal data in this document will include reference to any personal data relating to your children that you may provide to us.

For the purpose of this document, any reference to we, our or us shall be deemed to be a reference to the FAI via any channel or platform as accessed by you and provided by the FAI. References to 'you' or 'your' are references to you in your personal capacity as an individual or in your capacity as a representative where your own personal data has been shared or that of the person you are representing.

Please note that this Privacy Notice is a non-exhaustive reference document outlining the FAI's collection and use of personal data, should clarity be sought please contact us directly by emailing [datamanager@fai.ie](mailto:datamanager@fai.ie).

This privacy notice aims to give you information on how the FAI collects and processes your personal data through your engagement and participation with us, including any data you may provide through any FAI website when you sign up to a newsletter, purchase a product or service or apply to participate on any courses or programmes provided by us.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. FAI websites can utilise 'cookies' to track movement and assist the user to navigate between sections, please refer to the specific Cookies Policy for information in this regard. This privacy notice supplements the other notices and is not intended to override them. You can find additional information about privacy and your rights on the Data Protection Commission website [www.dataprotection.ie](http://www.dataprotection.ie).

Our Websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Should you wish to contact us in relation to this Privacy Notice we have a designated email to receive and action any requests for information or clarity and please contact [datamanager@fai.ie](mailto:datamanager@fai.ie).

At any stage you have the right to make a complaint to the Data Protection Commissioner's Office ([www.dataprotection.ie](http://www.dataprotection.ie)) being the supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Commissioner's Office so please contact us directly in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, any such changes can be reported to us via [datamanager@fai.ie](mailto:datamanager@fai.ie)

This privacy notice may be updated periodically and without prior notice to you to reflect changes in our practices or relevant laws.

**This version was last updated on 21<sup>st</sup> April 2022.**

## **2. THE DATA WE COLLECT ABOUT YOU**

### **Personal Data**

Personal or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, your photograph, username or similar identifier, title, marital status, date of birth, gender, club membership or affiliation.
- **Contact Data** includes home address, billing address, delivery address, email address, telephone numbers, social media handles.
- **Financial Data** includes bank account and payment card details.

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us, courses or programmes booked and attended.
- **Device Data** includes the type of mobile device you use, a unique identifier for example, your devices IMEI number, the MAC address of the devices wireless network interface, the type of browser you use of the mobile phone used y the device.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes username and password, purchases or orders made by you, your interests, participation history / statistics, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences and consents.
- **Engagement Data** includes, but is not limited to, your membership and registration details; identification documents; immigration documents; recruitment information; records and information on participation, ranking, ratings, playing details, history, competition results; attendance and performance; performance data; accreditations, qualifications, experience in current and previous employment; disciplinary and grievance information; information inputted on to the FAI's game management system ; CCTV footage and other information obtained via electronic and digital means, including footage of football matches in which you have participated.

### **Aggregated Data**

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

### **Special Categories**

"Special categories" of particularly sensitive personal information require higher levels of protection (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In certain circumstances, with your explicit written consent.
- Where necessary to carry out our legal obligations.
- For the safeguarding of children and individuals at risk.
- Anti-doping in sport.
- Standards and behaviours in sport.
- When required for the public interest, such as for equal opportunities monitoring.
- Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.
- In particular we may request medical or health information in order to ensure you or your child's safety and suitability when participating in certain FAI events. You are not obliged to provide this information but if we are not made aware of any relevant medical issues we will be unable to take appropriate measures to ensure your or your child's safety.
- In other instances we may collect information about other special categories such as ethnicity for statistical purposes or to assist us with achieving intercultural and diversity aims. The provision of such information is optional.

#### **Criminal convictions**

If applying for certain positions which will involve working with children or vulnerable adults such as coaching positions it may be necessary for Garda vetting purposes to collect information about criminal convictions and offences to comply with our legal obligations to safeguard and protect children and vulnerable adults. We will provide you with further information should it become necessary and we would refer you to our Child Welfare Policy for further information a.

#### **Children's Data**

Some of the services offered by FAI are for children. Accordingly we collect personal data about participating children. For any person under 18, explicit parental or guardian consent to the provision of such information will be required.

#### **Further information**

We may provide you with further specific information about the type of data and purpose of it at the point of data capture. Should you have any queries in relation to your data and how we may use it please contact us at [datamanager@fai.ie](mailto:datamanager@fai.ie).

### **3. HOW IS YOUR PERSONAL DATA COLLECTED**

We use different methods to collect data from and about you including through:

**Direct interaction;** You may give us your Identity, Contact and Financial Data by filling in forms (in writing or electronically) on the FAI's football management system or by submitting any

other applications to the FAI or by corresponding with us by post, phone, email or otherwise. This includes but is not limited to personal data you provide when you :

- apply to enrol for a course, training programme or event;
- create an account or profile on our website;
- subscribe to a mailing list;
- enter a competition, promotion or survey;
- register as a player, coach, staff member, match official, Club/League/Affiliate Association official, or Intermediary on the FAI's football management system;
- make a purchase in our online shop;
- you purchase an event ticket or hospitality package;
- give us some feedback.

**Automated technologies or interactions;** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see our cookie policy for further details.

**Third parties or publicly available sources;** We may receive personal data about you from various third parties who we are partnered with as set out below:

- FAI affiliated club or team in which you or your child are a member;
- FAI Affiliated Members;
- Leagues administered by FAI Affiliate Members;
- Ticketmaster;
- FIFA/UEFA, Sport Ireland or any other sports governing body that controls data about you;
- Other stakeholders including law enforcement or statutory bodies.

#### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when we have a lawful basis under the legislation to do so. Most commonly, we will use your personal data in the following circumstances:

- To respond to your enquiry;
- To acknowledge any contribution you may make;
- To administer the relevant competition;
- To perform any contract we may enter into with you;

- To conduct research;
- To send marketing information where permitted;
- To track your activity on our digital platforms;
- To create a profile to better understand and respect your preferences;
- To personalise and improve your experience on our digital platforms;
- Other reasonable purposes for which you have provided information;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where required to comply with a legal or regulatory obligation.

The section below sets out the types of lawful basis that we will rely on to process your personal data. Generally we do not rely on consent as a legal basis for processing your personal data (save where consent is lawfully required e.g. for sending electronic marketing purposes). If consent is used as a legal basis for processing your data, you have the right to withdraw consent at any time by contacting [datamanager@fai.ie](mailto:datamanager@fai.ie).

## 5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of the main purposes for which we process your personal information together with the legal basis we rely upon to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact [datamanager@fai.ie](mailto:datamanager@fai.ie) should you require details about the specific legal ground on which we rely to process your personal data where more than one ground has been set out in the table below.

The lawful basis of processing that we use include;

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting [datamanager@fai.ie](mailto:datamanager@fai.ie)
- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

<b>Purpose/Activity</b>	<b>Lawful basis for processing</b>
To administer any membership account(s) and/or registration/accreditation and/or relationship you have with us and managing our relationship with you, and dealing with payments and any support, service or enquiries made by you.	Necessary to enable us to properly manage and administer your membership contracts with us.
To display your playing history and statistics within the FAI's football management system	Necessary for our legitimate interest in administering football in Ireland and developing the game.
To arrange and manage the provision of national governing body services, including the promotion of football in Ireland by various mediums.	Necessary to enable us to properly administer and perform our responsibilities and services as a national governing body.
To send you information relevant and relating to your participation in football, including but not limited to, surveys and other forms of questionnaire.	This is necessary to enable us to properly manage and administer your relationship with us and your participation in football.
To administer and make decisions about your progression and accreditation/registration/membership status.	This is necessary to enable us to properly manage and administer your development through the course and/or programme.
To administer your attendance at any courses or programmes you sign up to.	This is necessary to enable us to register you on to and properly manage and administer your development through the course and/or programme.
To administer and protect our business and digital platforms and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) together with protecting the security and integrity of our IT systems.	We have a legitimate interest to ensure that our IT Systems are secure and that our relationship is targeted and relevant.

<p>To conduct health and player safety analysis and research and to comply with health and safety requirements.</p>	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in football.</p>
<p>To provide and administer insurance policies put in place by or on behalf of the FAI.</p>	<p>We have a legitimate interest in doing so to ensure the insurance policies can be administered.</p>
<p>To ensure equality of opportunity and treatment and for the purposes of equal opportunities monitoring.</p>	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in football.</p>
<p>To conduct performance reviews, manage performance and determine performance requirements and administer your development, training requirements on any player/coach/referee pathway programme. To make decisions about your progression and development through any player/coach/referee pathway programme and to assist with the delivery of rankings and ratings.</p>	<p>This is necessary to enable us to properly manage and administer your development through the performance programme.</p>
<p>To administer any drug and alcohol testing, and administer, apply and uphold the anti-doping regulations.</p>	<p>We have a legal obligation and a legitimate interest to protect the integrity of football and to provide you and other members of our organisation with a safe and fair environment in which to participate in football.</p>
<p>To safeguard children and individuals at risk, and to comply with legal obligations and requirements with regards people working with children or adults at risk.</p>	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe and fair environment in which to participate in football.</p>
<p>To apply, administer, uphold, prevent, detect, investigate and ensure compliance with regulations, codes, policies and processes, and to protect and uphold the integrity and repute of the game, the FAI and other members of the football family.</p>	<p>We have a legitimate interest to protect the integrity of football and to provide you and other members of our organisation with a safe and fair environment in which to participate in football.</p>

To undertake and gather evidence for investigations, and administer grievance or disciplinary hearings.	We have a legitimate interest to protect the integrity of football, to provide a safe and fair environment for all members and to ensure the effective application, adjudication and management of disciplinary decisions, hearings and appeals.
To publish decisions of disciplinary hearings if required and to ensure transparency and awareness amongst, clubs, educational institutions, constituent bodies and other stakeholders involved in football.	We have a legitimate interest to protect the integrity of football, to provide a safe and fair environment for all members and to uphold the disciplinary process and Regulations.
To record player match appearance and performance data (e.g. fixture, points scored and other playing attributes)	We have a legitimate interest to ensure that data is accurate for competition integrity, to promote player participation in football throughout Ireland and to report on football participation to stakeholders.
To assess your eligibility for and to provide support, benefits, funding, grants, accreditations, certifications, registrations and such other FAI benefits.	This is necessary to enable us to properly administer and perform any application or contract for the provision of a benefit
To send you information which is included without any membership package you have including details about ticket information, competitions and events and commercial partner offers or updates.	This is necessary to enable us to properly manage and administer your contract with us.
To send you other marketing information we think you might find useful or which you have requested from us, including news items, information about membership, events, participation, programmes, and information about our commercial partners.	Where you have given us your consent to do so.
To conduct data analytics studies to better understand event attendance and trends within the sport.	We have a legitimate interest to ensure that our membership is targeted and relevant.
To comply with non-player specific health and safety requirements.	We have a legal obligation and legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in football activity.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we

reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to receive an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact [datamanager@fai.ie](mailto:datamanager@fai.ie).

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Opting Out**

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of a course participation, membership registration or other transactions.

## **6. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out above.

### **Internal Third Parties.**

Other members of the FAI corporate group.

### **External Third Parties**

- FAI Affiliated Associations.
- Leagues that are administered by the FAI Association.
- Football Clubs under the jurisdiction of the FAI.
- FIFA, UEFA, Sport Ireland and other governing bodies for football who may reasonably require your personal data for the administration of football.
- Service providers based in EEA who provide IT, ticketing and system administration services.
- Our event partners so that they can verify authenticity of tickets and control access to such events in order to fulfil our contractual obligations to you.
- Our Commercial Partners for the purposes of providing you with information on any special offers, opportunities, products and services and other commercial benefits provided by our commercial partners where you have given your express consent for us to do so.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, payroll, banking, legal, insurance and accounting services.
- Revenue, governmental agencies, regulators, grant authorities and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances or to whom we are obliged to share information about our organisation and participation in it.

- Individual or bodies appointed by the FAI including, but not limited to, Disciplinary Committees and Appeal Committee members (or independent arbitration services) or independent Club Licensing committee.
- Statutory authority or agency as appropriate.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions and any data process agreements that are in place.

## **7. INTERNATIONAL TRANSFERS**

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- We may transfer the personal information we collect about you outside the EU in order to comply with our legal and regulatory obligations to UEFA, FIFA or any other appropriate body involved in the governance of football in Wales or elsewhere. Depending on where that information is transferred there may or may not be an adequacy decision by the European Commission in respect of that country. This means that a country to which we transfer your data may not be deemed to provide an adequate level of protection for your personal information. However, to ensure that your personal information does receive an adequate level of protection we will only transfer that information which is strictly necessary to comply with our legal or regulatory obligations and only to those parties that have a right to receive that information.
- Where we use certain service providers, we may use specific agreements approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries. We will seek to ensure that these agreements comply with the minimum requirements of the GDPR.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield. We will seek to ensure that these agreements comply with the minimum requirements of the GDPR.

## 8. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

### You may

- **Request access to your personal data.**  
This is commonly known as a “data subject access request”. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. For more information on our subject access request policy please contact [datamanager@fai.ie](mailto:datamanager@fai.ie).
- **Request correction of your personal data.**  
This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.**  
This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object

to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing of your personal data.**

You may object where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights.

- **Request restriction of processing your personal data.**

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request transfer of your personal data to a third party.**

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you

- **Right to withdraw consent.**

Where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

For further information on your rights in respect of your personal data please visit [www.dataprotection.ie](http://www.dataprotection.ie) and should you wish to exercise any of the rights set out above, please contact [datamanager@fai.ie](mailto:datamanager@fai.ie) with your specific query or request.