



Data Protection Policy

Introduction

Triathlon Ireland ("TI") collects, stores, and processes personal data during its activities. TI is committed to ensuring that such information is handled in compliance with the General Data Protection Regulation (GDPR) and the Irish Data Protection Act 2018.

This policy sets forth TI's approach to data protection to ensure compliance with legal requirements and the rights of data subjects.

Definitions

Data: Information stored electronically or in structured paper-based filing systems.

Data Subject: A living individual whose personal data is processed by TI.

Personal Data: Information relating to an identified or identifiable person, including names, addresses, images, and opinions.

Sensitive Personal Data: Data about racial/ethnic origin, political opinions, religious beliefs, health, or sexual orientation.

Data Controller: The entity that determines the purpose and means of processing personal data (e.g., TI).

Data Processor: A third party processing data on behalf of the controller.

Processing: Any operation performed on data, including collection, recording, storage, or destruction.

EEA: European Economic Area (EU Member States plus Iceland, Liechtenstein, and Norway).

Data Protection Principles

TI adheres to the following principles:

1. **Lawfulness, Fairness, and Transparency:** Data must be processed lawfully, fairly, and transparently.
2. **Purpose Limitation:** Data must be collected for specified, explicit, and legitimate purposes.
3. **Data Minimization:** Only data necessary for the purpose should be collected.
4. **Accuracy:** Data must be accurate and kept up to date.
5. **Storage Limitation:** Data must not be kept longer than necessary.
6. **Integrity and Confidentiality:** Data must be processed securely.
7. **Accountability:** TI is responsible for demonstrating compliance with these principles.

Rights of Data Subjects

Data subjects have the following rights:

- **Access:** Request access to their data.
- **Rectification:** Correct inaccurate or incomplete data.
- **Erasure:** Request deletion of their data ("right to be forgotten").
- **Restriction:** Restrict processing of their data.
- **Data Portability:** Receive their data in a portable format.
- **Objection:** Object to processing based on legitimate interests or for direct marketing.
- **Automated Decision-Making:** Challenge decisions made solely on automated processing.

Requests should be directed to the Data Protection Officer (DPO) at dpo@triathlonireland.com.

Data Security

TI implements appropriate technical and organizational measures, including:

- **Access Control:** Limit access to personal data to authorized individuals.
- **Encryption:** Secure electronic data with encryption where necessary.
- **Disposal:** Shred physical records and securely delete electronic data no longer required.
- **Training:** Regular training for employees handling personal data.

Data Breach Management

In the event of a data breach:

1. Notify the DPO immediately.
2. Assess the breach to determine the potential risk to data subjects.
3. Report significant breaches to the Data Protection Commission (DPC) within 72 hours.
4. Notify affected individuals when required.

Data Retention

TI retains data in line with defined schedules:

Data Type	Retention Period	Disposal Method
Member data	5 years post-membership	Shredding, deletion
Medical records	2 years	Shredding, deletion
Litigation-related documents	Do not destroy	Secure archiving

Consent Management

TI ensures:

- Consent is explicit and informed for sensitive data.
- Withdrawal of consent is documented and honored promptly.

Data Transfers

TI ensures data transfers outside the EEA are compliant with GDPR, using mechanisms like:

- Standard Contractual Clauses (SCCs).
- Binding Corporate Rules (BCRs).
- Adequacy decisions from the European Commission.

Governance and Accountability

- **DPO:** Responsible for overseeing compliance and responding to queries at dpo@triathlonireland.com.
- **Training:** All employees and volunteers undergo regular training on data protection.
- **Policy Review:** This policy is reviewed annually or upon significant legal changes.

Contact Information

Questions regarding this policy can be directed to:

Data Protection Officer

Triathlon Ireland

dpo@triathlonireland.com