

IRISH FOOTBALL ASSOCIATION LIMITED
FOOTBALL MANAGEMENT SYSTEM / FOOTBALL NI
MOBILE APPLICATION PRIVACY NOTICE

Introduction

The Irish Football Association Limited (“the IFA”, “we”, “our” and “us”) respects your privacy and is committed to protecting your personal data. This privacy notice sets out how the IFA processes your personal data using the Football Management System and/or the Football NI mobile application.

The IFA is obligated to comply with the Data Protection Act (DPA) 2018. This privacy notice is written to comply with the DPA. The IFA takes your privacy seriously and we are committed to your data protection rights. Section 10 of this privacy notice sets out more details regarding your legal rights.

Please use the Glossary and the defined terms in the IFA Rules to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE

2. THE DATA WE COLLECT ABOUT YOU

3. IFA THIRD PARTIES AND DATA SHARING

4. HOW IS YOUR PERSONAL DATA COLLECTED

5. HOW WE USE YOUR PERSONAL DATA

6. DISCLOSURES OF YOUR PERSONAL DATA

7. INTERNATIONAL TRANSFERS

8. DATA SECURITY

9. DATA RETENTION

10. YOUR LEGAL RIGHTS

11. GLOSSARY

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how the IFA collects and processes your personal data.

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. This privacy notice supplements the other notices and is not intended to override them.

Controller

The IFA is the controller and responsible for your personal data.

The IFA is responsible for the proper administration of football in Northern Ireland in accordance with the IFA's own Rules and Regulations, its obligations in law and in order to comply with the rules and regulations imposed upon it by FIFA and UEFA. We have appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Officer using the details set out below.

Contact details

Our full details are: The Irish Football Association

Full name of legal entity: The Irish Football Association Limited

Email address: data.protection@irishfa.com

Postal address: The National Football Stadium at Windsor Park, Donegall Avenue, Belfast, BT12 6LU

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 3 October 2022.

This privacy notice may be updated periodically and without prior notice to you to reflect changes in our information practices or relevant laws. We will post a notice on www.irishfa.com/comet to notify you of any substantive changes to the way we collect and use your information.

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.

2. The data we collect about you

Personal data, 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, maiden name, last name, your photograph, username or similar identifier, marital status, title, date of birth, country of birth and gender.
- **Contact Data** includes home address, business address, email address, telephone numbers and your next of kin contact details.
- **Transaction Data** includes details about payments made by you.
- **Device Data** includes the type of mobile device you use, a unique identifier for example, the type of browser you use, browser version and operating system.
- **Technical Data** includes IP address, your login data, browser type and version, time zone setting and location, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, contact information, payments made by you, participation

history / statistics and preferences.

- **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.

We may 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.

We may collect **Special Categories of Personal Data** about you. This may include information about your health where this is strictly necessary and in accordance with our Rules and Regulations or in order to comply with our obligations to FIFA or UEFA. We may also collect information about criminal convictions and offences in order to comply with our obligations in relation to safeguarding.

If you fail to provide personal data

Where we need to collect personal data by law, under the terms of a contract we may have with you or in relation to our legitimate interest in administering football in Northern Ireland in accordance with our Rules and Regulations and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or administer football in Northern Ireland in accordance with our Rules and Regulations; in which case, you may not be able to be involved in football organised by the IFA but we will notify you if this is the case at the time.

3. IFA third parties and data sharing

Analyticom is the third party service provider who host the IFA FMS and Football NI systems. Analyticom will be able to access the system and your data for technical support purposes. Analyticom is not entitled to use your data for their own purposes unless you agree to them doing so. Analyticom is a company whose Head Office is in Zagreb, Croatia. All data captured via the system will be stored in Analyticom's data centre in Germany which is replicated in another data centre in New Zealand.

Where you are a player, your initial registration information may be entered into the system by a club official at your current club, although the data will initially be collected from you.

Information about players is shared amongst Leagues, Divisional Associations, the IFA and other Football Associations for football administration purposes.

Information relating to your disciplinary record and any misconduct charge will be provided by a referee or disciplinary authority directly into IFA FMS. This information will be shared with IFA members including the Disciplinary Committee and where necessary, the Appeals Committee.

Where you are a club official, information may initially be entered into the system by us or by another club official. Information about training or usage checks may also be provided by a third party.

4. How is your personal data collected?

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

- **Direct interactions.** You may give us your identity and contact data by filling in forms (in writing or

electronically) on the IFA's football management system. This includes but is not limited to personal data you provide when:

- you apply to be set up as an authorised user on the IFA's football management system;
 - you apply for our products or services;
 - your details are registered as a Player, Coach, Staff Member, Match Official, Club/League/Divisional Association Official, or Intermediary on the IFA's football management system;
 - your details and playing statistics are updated and subsequently displayed on the Football NI mobile application and other relevant websites
- **Automated technologies or interactions.** As you interact with our website or mobile applications, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
 - **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU;
 - Divisional Associations will use your data to administer its competitions and teams for the following purposes;
 - Communicating with you to administer the competitions
 - Communicating directly with club officials about you
 - Eligibility checks
 - Complying with FIFA and IFA Player Registration Regulations
 - Leagues will use your data to administer its competitions and teams for the following purposes:
 - Communicating with you to administer the competitions
 - Communicating directly with club officials about you
 - Eligibility checks
 - Complying with FIFA and IFA Player Registration Regulations
 - Clubs of which you are a member or are registered as a Player will use your data to administer its Clubs and teams in particular for the following purposes;
 - Adding new players
 - Searching for existing players
 - Communicating with you in relation to administration
 - Eligibility checks
 - Complying with FIFA and IFA Player Registration Regulations
 - The Disclosure and Barring Service:
 - FIFA, UEFA, or any other sports governing body that controls data about you; and UK Anti-Doping.

5. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- 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 we need to comply with a legal or regulatory obligation.

Please see below to find out more about 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 other than in relation to third party direct marketing communications via email or text message, obtaining information about your health or obtaining a disclosure certificate from the Disclosure and Barring Service. You have the right to withdraw consent at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data and which of the legal bases we rely on 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 us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To register you as a member, Player, Match Official, Coach, Staff Member, Intermediary, Official of a Club, League or Divisional Association.</p> <p>To register you as an authorised user of the IFA's football management system.</p> <p>To install the Football NI mobile application.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Transaction</p> <p>(d) Device</p>	<p>Your consent</p> <p>Performance of a contract with you.</p> <p>Necessary for our legitimate interest in administering football in Northern Ireland and in accordance with our Rules and Regulations.</p>
<p>To display your (and/or your team's) match history and statistics on the Football NI mobile application and on the IFA's website.</p> <p><i>If you do not want your personal details to appear on the Football NI app please contact us at comet@irishfa.com</i></p>	<p>(a) Identity</p> <p>(b) profile</p>	<p>Your consent</p> <p>Performance of a contract with you</p> <p>Necessary for our legitimate interests in administering football in Northern Ireland and developing the game.</p>

<p>To process the following:-</p> <p>(a) Manage payments, fees, fines & charges.</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p>	<p>Your consent</p> <p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to recover funds due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Notifying you of your exclusive membership benefits</p> <p>(c) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>Your consent</p> <p>Performance of a contract with you</p> <p>Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To investigate and/or initiate disciplinary proceedings for an alleged breach of the IFA's Rules and/or Regulations</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Financial</p> <p>(e) Transaction</p>	<p>Your consent</p> <p>Performance of a contract</p> <p>Necessary for our legitimate interest in administering football in Northern Ireland and in accordance with our Rules and Regulations.</p>
<p>Collect data for Judicial Bodies</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Transaction</p>	<p>Your consent</p> <p>Performance of a contract</p> <p>Necessary for our legitimate interest in administering football in Northern Ireland and in accordance with our Rules and Regulations.</p>
<p>To obtain DBS certificates</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>Your consent</p> <p>Performance of a contract with you</p> <p>Necessary for our legitimate interest in administering football in Northern Ireland and in accordance with our Rules and Regulations</p>
<p>To administer applications for affiliation to the IFA</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Transaction</p> <p>(d) Financial</p>	<p>Your consent</p> <p>Performance of a contract with you</p> <p>Necessary for our legitimate interest in administering football in Northern Ireland and in accordance with our Rules and Regulations</p>

To investigate concerns, allegations, or referrals with regards to child/adult at risk protection	(a) Identity (b) Contact (c) Profile (d) Transaction	Your consent Necessary for our legitimate interest in administering football in Northern Ireland and in accordance with our Rules and Regulations Necessary to comply with our legal obligations in relation to safeguarding.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage (c) Device	Necessary for our legitimate interests to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing and Third-party marketing

We will get your express opt-in consent before we use or share your personal data with any company outside the IFA for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us in order to comply with our Rules and Regulations or those of FIFA, UEFA, and any other appropriate body.

Where you have provided us with consent to be contacted by third parties for marketing purposes you can withdraw this consent at any time. Please see below.

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 get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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.

6. Disclosures of your personal data

We may have to share your personal data with the External Third parties detailed in the Glossary for the purposes set out in the table in paragraph 5.

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.

7. International transfers

We will only share data with entities outside the UK where we are compelled by FIFA regulations to request or issue an International Transfer Certificate.

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 instruction and they are subject to a duty of confidentiality.

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

9. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably 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, whether we can achieve those purposes through other means and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

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.

Information stored for disciplinary purposes may be retained and stored indefinitely in order to maintain a record of the game.

10. Your legal rights

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

Request access to your personal data (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.

Request correction of the personal data that we hold about you. 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 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 and freedoms.

Request restriction of processing of 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 the transfer of your personal data to you or 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.

Withdraw consent at any time 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.

If you wish to exercise any of the rights set out above, please contact us.

How to contact us

If you have any questions about this privacy notice, want the IFA to stop communicating with you or want to exercise your rights such as those described above, you may do this by emailing us at data.protection@irishfa.com or write to us at The National Football Stadium at Windsor Park, Donegall Avenue, Belfast, BT12 6LU.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

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. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Data Protection Authority

The IFA acknowledges the Information Commissioners Office (ICO) as the data protection authority in the UK and Northern Ireland. You may contact the ICO at any time. Contact details can be found on the website <https://ico.org.uk/>.

11. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of the FAW in administering football in Wales in accordance with our own Rules and Regulations, the rules and regulations of FIFA and UEFA and for conducting and managing the FAW to enable us to give you the best service possible. 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 us.

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.

THIRD PARTIES

External Third Parties

- Divisional Associations (as defined in the IFA Rules).
- Leagues
- Football Clubs who are governed by the IFA.
- FIFA, UEFA, and national governing bodies for football who may reasonably require your personal data for the proper administration of football in that country.
- Professional advisers including lawyers, bankers, auditors, and insurers based inside the EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Disclosure and Barring Service.
- Individuals appointed by the IFA including, but not limited to, Disciplinary Committee and Appeals Committee members.

- Any sports arbitration service nominated by the IFA from time to time to deal with independent arbitration in accordance with the Rules of the IFA.
- The Police, Child Support Agency, or any other body with statutory authority to obtain personal data from us.

October 2022