

Data Protection and Privacy Statement

Kilkenny Local Authorities Leisure Complex Ltd

T/A The Watershed
Bohematounish Road, Kilkenny

Tel: +353 56 7734620
Web: www.thewatershed.ie



DATA PROTECTION ACT 1988 AND 2003 GENERAL DATA PROTECTION REGULATION MAY 25th 2018

The General Data Protection Regulation (GDPR) comes into force in Europe on 25th May 2018. This applies to all companies operating within the European Union and governs how they store and use their customers' personal data.

At the Watershed we are committed to fulfilling our GDPR regulations and will always manage personal data securely and treat it appropriately, with the utmost care and respect for our customers' privacy.

We will only make contact with customers once they have provided prior consent to be informed of important notifications regarding our facilities and services and/or details of upcoming events and special offers.

For a copy of our **Data Protection Policy** and any related queries, please contact **Amanda Menton**, designated Data Processor for The Watershed amanda.menton@thewatershed.ie

Signature:
Data Controller Tina Dowling

Date:

Signature:
Data Processor Amanda Menton

Date:

Data Protection Policy

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DATA PROTECTION ACT 1988 AND 2003

GENERAL DATA PROTECTION REGULATION MAY 25th 2018

Purpose

Compliance with European GDPR 25th May 2018

Scope

All personal data belonging to customers, obtained, stored and used solely for the function of our business and the provision of services to customers.

Procedure

There are eight specific rules of GDPR which we are aware of and committed to complying with. All staff are aware of these rules and instructed on how they apply them to their individual responsibilities within their departments.

These rules are:

1. Data will be obtained and processed fairly
2. Data will only be kept for specified and lawful purposes
3. Data will be processed only in ways compatible with the purpose for which it was initially given
4. Data will be kept safe and secure
5. Data will be maintained accurate and up-to-date
6. Only Data that it is adequate, relevant and not excessive will be obtained
7. Data will be retained no longer than is necessary for the specified purpose
8. Copies of Personal Data will be provided to individuals, upon receipt of their written request

1. What is personal data and where do we collect it?

Everything that contains any information that can be used to identify a customer such as their name, address, telephone number, email address, date of birth, bank account details and any medical information. This data is collected on the following documents:

- Membership application forms
- Direct Debit forms
- Pre-Screening Forms
- Fitness Assessment Documents
- Children's Camp Application forms
- Adult and Child Lesson Enrolment Forms
- Accident/Incident Forms
- Customer Comment Cards
- Facility Booking Forms
- Birthday Party Booking Forms
- Other forms not listed that are necessary for the function of business and provision of services
- Customer contact received via direct email, social media, company website or company mobile application

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2. Where is Data stored?

Personal data that is collected electronically or manually on paper documents, completed either by the customer or member of staff, is stored safely, secure from unauthorised access, disclosure, destruction or accidental loss.

All electronic data is protected by I.T. security measures and anti-virus control which is provided by Kilkenny Local Authorities.

All electronic data is backed up daily and retained by Kilkenny Local Authorities.

3. Who has access to Personal Data and why?

The following departments will collect personal data on the forms listed in section 1.

- Reception
- Membership
- Gym
- Swimming Pool

Data is collected by staff members within each department for the sole purpose of providing facilities and services within those departments.

By the nature of their roles within the company, the Chief Executive, Finance Manager, Duty Managers and Personal Assistant to the Chief Executive, may request access to personal data from the Data Controller who may grant access should it be deemed necessary for the function of business.

4. Unsolicited Contact

There will be no unsolicited contact made to customers without their prior consent.

Once consent is given, The Watershed may make contact with customers in order to provide them with notifications regarding facilities and services, details of upcoming events and special offers.

5. Data Retention Periods

- Accounting records detailing Point of Sale transactions, including supporting documents: **6 years**
- Records of tax payments: **6 years**
- Records dealing with annual leave, public holiday leave and other employee leave entitlements: **3 years**
- Recruitment records for unsuccessful candidates: **12 months minimum**
- Recruitment records for successful candidates: **Period of employment minimum**
- Records of accidents and dangerous occurrences: **10 years**
- VAT Records: **6 years** from the date of the latest transaction to which they relate
- Membership Records: **term of membership + 12 months**
- Direct Debit forms: **term of membership + 12 months**
- Pre-Screening Forms: **term of membership +12 months (members); 12 months (non-members);**
- Fitness Assessment Documents: **term of membership +12 months (members); 12 months (non-members)**
- Children's Camp Application forms: **12 months**
- Adult and Child Lesson Enrolment Forms: **12 months**
- Customer Comment Cards: **12 months**
- Facility Booking Forms: **term of booking +12 months**
- Birthday Party Booking Forms: **12 months**
- Customer contact received via direct email, social media, company website or company mobile application: **12 months**

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6. Destruction of Data

Data will be removed from file manually or electronically once their specific retention period has been exceeded.

Manual data will be boxed and collected by a Document Shredding Company who will then provide a certificate of destruction.

Electronic data will be deleted by the individual user as directed by the Data Processor and will provide confirmation of same to the Data Processor.

7. Provision of copies of Personal Data to the Customer

All requests for copies of personal data must be made to the Data Processor in writing.

All requests will be acknowledged by the Data Processor immediately upon their receipt.

All requests for personal data will be fulfilled or a further response will be made regarding same by the Data Processor to the customer or the customer's representative, within thirty days of the request having been received.

8. Breaches of Data

The Watershed treats the access to and storage of all personal data belonging to customers very seriously and there will no unauthorized access to data within each department by staff members outside of those departments, unless access is granted as detailed in section 3.

Should an internal or external breach of data occur, this must be immediately notified to the Data Controller.

The Data Controller will immediately notify the Data Protection Commissioner of any breaches.

The Data Processor acting on behalf of the Data Controller will carry out an immediate investigation on any reported breach.

The Data Controller will exercise the right to impose any internal disciplinary actions and/or any actions as governed by the Data Protection Act 1988 and 2003 and General Data Protection Regulation May 25th 2018.

For any queries in relation to this Policy, please contact **Amanda Menton**, designated Data Processor for The Watershed amanda.menton@thewatershed.ie

Signature:
Data Controller Tina Dowling

Date:

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