Paralympics Ireland Privacy Notice

1. Introduction

Paralympics Ireland (PI) is committed to protecting the privacy and personal data of all individuals with whom we engage, including athletes, coaches, staff, volunteers, stakeholders, partners, and website users.

This Privacy Policy outlines how PI collects, uses, stores, shares, and protects personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Data Protection Act 2018.It also explains your privacy choices when using our website as well as your right to access your information under Data Protection Legislation.

This privacy notice applies to personal data we collect directly from you, as well as information we may obtain from third parties (such as National Governing Bodies or the Sport Ireland Institute). This policy does not apply to third party websites, products or services, even if they link to our services or websites, If you visit a website operated by a third party through a link included on our Website, your information might be used differently by the operator of the linked website.You should consider the privacy practices of those third-parties carefully before you submit any personal data to these websites. PI does not accept any responsibility for these policies.

We have appointed a Data Protection Compliance Manager who has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice. We have not appointed a statutory Data Protection Officer (DPO) as it is not legally mandated under Article 37 of the GDPR.

2. Data Controller

PI is the Data Controller for all personal data which is collected and used. Article 4(7) of the GDPR defines Data Controller as the legal entity which determines how and why personal data is collected and used.

3. What Personal Data we collect

Personal data is defined by Article 4(1) of the GDPR as any information relating to you which allows PI to identify you

PI may collect and process and use the following categories of personal data about you such as:

• Identity information (name, date of birth, gender, signatures, membership details and affiliations, passport details, drivers license and other forms of identification)

• Passports & travel logistics data (passport copies, mobility aid requirements, or severe allergy information)

• Contact information (address, email address, phone number, emergency contacts, next of kin information,)

- Details of financial transactions with you (bank details, expense claims, bursary payments, payroll data, PPS numbers)

• Athlete information (classification, eligibility, performance, training and competition information, medical and disability information)

• Safeguarding and welfare information where required

- Criminal Convictions and Offences Data (specifically Garda Vetting disclosures required for statutory safeguarding purposes).
- Data which we require in order to investigate and process complaints or disciplinary matters in accordance with our rules;

• Event registration and participation information in relation to PI events, presentations, information sessions and workshops

• Communications with us such as emails, responses to surveys, feedback and marketing preferences

- Video and photographic images and voice recordings which we take ourselves or other people provide to us;

• Website usage data (IP address, browser type, cookies)

4. Special Category Data

Due to the nature of Paralympic sport, PI processes Special Category Data, which includes information relating to an individual's race, ethnicity, religious beliefs and sexual orientation, disability, classification, and, where necessary, relevant health, medical, welfare and biometric information. This information is necessary to determine athlete eligibility and classification, to support safe participation in sport, and to fulfil Paralympics Ireland's safeguarding, regulatory, and governance responsibilities.

PI only processes this data where it is lawful and necessary to do so, in accordance with GDPR. Appropriate safeguards are in place to ensure that this information is handled securely,

accessed only by authorised personnel, and protected against unauthorised access, disclosure, or misuse.

This data is processed only where necessary and lawful under **GDPR Article 9** including where:

- Explicit consent has been obtained
- Processing is necessary for reasons of substantial public interest (including statutory exemptions under Irish law for sporting organisations to determine eligibility and classification)
- Processing is necessary for reasons of substantial public interest for safeguarding purposes
- Processing is necessary for the establishment, exercise or defence of legal claims (such as defending classification decisions)

Appropriate safeguards are applied to protect this data.

5. How we collect your Personal Data

Personal data may be collected through:

- Athlete registration and classification processes
- Event registration and participation
- Competing on a Paralympic team at Paralympic events or taking part in training
- Third-party sources, including National Governing Bodies (NGBs), the Sport Ireland Institute, and parents or appointed guardians acting on behalf of minors or vulnerable adults.
- Website forms, surveys, feedback forms and newsletter subscriptions
- Direct communications (email, phone, meetings)
- Engagement with us as a contractor, employee, volunteer or supplier
- Involvement in a complaint, dispute or disciplinary process
- Social media interactions (see section ?? below)
- Website cookies and analytics tools

6. Why we collect your Personal Data Personal data is collected and processed for the following purposes:

- Administering athlete participation and eligibility
- Providing support, bursaries and funding to athletes
- Delivering sporting programmes and events
- Facilitating travel, accommodation, and logistics for Games, competitions, and training camps
- Processing financial transactions, including athlete expenses and the administration of commercial partner benefits
- Meeting safeguarding and welfare responsibilities

- Communicating with stakeholders, athletes and staff
- Promoting disability sport and disability sports event and activities
- Marketing and fundraising
- Complying with legal and regulatory requirements
- Improving services and website functionality
- Maintaining a Historical Sporting Archive in the public interest and for statistical purposes
- To deal with disputes or gathering evidence for possible grievance or disciplinary hearings

7. Legal Basis for Processing

Paralympics Ireland processes personal data under one or more of the following lawful bases:

- Consent - Where you have given us clear, explicit consent to process your data for a specific purpose (for example, opting in to marketing communications or participating in performance analysis tracking).
- Contractual necessity - Where processing is necessary to enter into or perform a contract with you (for example, registering you for a competition, or booking necessary travel and logistics).
- Legal obligation - Where we must process your data to comply with Irish or EU law (for example, processing Garda Vetting to comply with statutory safeguarding laws, or retaining financial transaction records to comply with Revenue obligations).
- Legitimate interests - Where it is necessary for our legitimate organisational interests (or those of a third party), provided your fundamental rights and freedoms do not override them. Our specific legitimate interests include promoting Para sport globally, managing day-to-day communications, and administering commercial partner benefits (such as the athlete Uber credit scheme).
- Vital interests - Where it is necessary to protect your life or the life of another person (for example, sharing severe allergy or medical information with travel providers or medical staff in an emergency).

9. Sharing your Personal Data

Paralympics Ireland will only share your personal data with external third parties where it is necessary and where we have a lawful basis to do so. We may share your data with the following categories of recipients:

- National and International Sporting Bodies, including the International Paralympic Committee (IPC), National Governing Bodies (NGBs), and Local Organising Committees (including their respective officials) and the Sport Ireland Institute to facilitate your registration, classification, and participation in competitions.

- Third-party service providers who supply us with essential operational services, including IT and database platforms (such as our Athlete Management System), and

payroll administrators. These providers act strictly as our Data Processors, process data only on our documented instructions, and are bound by robust confidentiality and data processing agreements.

- Travel agencies, airlines, and accommodation providers to facilitate necessary bookings for training camps and Games (this may include sharing necessary passport details and severe allergy information to protect your vital interests).
- Professional Advisors & Financial Institutions, such as our tax, legal, and corporate advisors, alongside our banking providers (e.g., Bank of Ireland) to process expense and bursary payments.
- Government, regulatory, and safeguarding bodies (such as Sport Ireland, Revenue, and the National Vetting Bureau) where we are legally obliged to report information or conduct background checks.
- News and Media Outlets sharing is strictly limited to public relations material, promotional imagery, and sporting results, subject to your explicit consent or our legitimate interests in promoting Para sport.

Data Transfers to Official Partner / Third Party Supporter Organisation Based on Consent

We may transfer your personal data to third-party service providers or partners only when you have given your explicit consent. Such transfers are conducted in compliance with applicable data protection laws to ensure the security and confidentiality of your information. You have the right to withdraw your consent at any time, which will not affect the lawfulness of any processing based on consent before its withdrawal.

To unsubscribe, you can follow documentation directions or email your request to info@paralympics.ie. If you have indicated explicit consent during sign-up, we shall also pass your details to our official partner/third party supporter organisations, so they may send you information and offers. You will be given the option to unsubscribe at each point of contact.

PI does not sell personal data to third parties.

10. How long we keep your personal data

Personal Data will not be kept longer than is reasonable and necessary for the purposes for which it was collected. This means that data will be destroyed or erased from our systems when it is no longer required.

The specific length of time data is retained will depend on the type of information and the reason we collected it from you.

Document	Retention period
Financial documents (incl: annual financial statements, employee payroll and tax)	7 years to comply with Revenue obligations. However, live payee bank details stored on our online banking portals are automatically purged after 1 year of inactivity for security and data minimisation purposes.
Company books, records and documents	6 years as per the Revenue requirements.
HR records,	Employers are statutorily required to keep records of holidays, public holidays, special leave, rest breaks, start and finish times of each employee for each day and sick leave for a period of 3 years in accordance with the Organisation of Working Time Act 1997. Medical and absence records specifically relating to work-related illnesses or injuries are retained for the term of employment plus 7 years post-employment to defend against potential legal claims.
Employee records	Term of employment and 7 years post-termination.
Contracts for services	for the duration of the contract plus a duration of 7 years thereafter.
Recruitment documentation	1 year following the completion of the selection process.
Safeguarding documents	Safeguarding records (the vetting reference number, date of disclosure, and outcome) are retained on the individual's file for the duration of their employment or volunteering role plus 1 year. The actual physical Garda Vetting disclosure documents are securely destroyed after 6 months once the outcome has been recorded on our secure systems.

Stakeholders' details	until no longer necessary, such as retirement of an athlete, termination of contract with sponsors, etc.
Casual try-sport events (such as 'Next Gen' event registrations)	These will be securely deleted shortly after the event concludes or after a brief series of connected events, as there is no ongoing operational requirement to retain it.
Participation data including contact information, emails and correspondence	6 years from departure from active competition
Classification and related medical data	retained for the duration of the athlete's active career and thereafter permanently archived (subject to a 10-year periodic review) strictly for the establishment, exercise, or defence of sporting classification challenges and historical sporting integrity
Historical Sporting Archive	Statistics, results, historical member images/video footage, will be retained indefinitely in a secure archived form, completely separate from public-facing social media, and is justified under the GDPR exemption for Archiving in the public interest
Active Social Media Promotion	Images and video footage used for promotional purposes are retained on active social media platforms for the duration of the relevant promotional campaign or active Paralympic cycle, or until the data subject withdraws their consent (which triggers a 7-day takedown process)
Passports and travel logistics data (including severe allergy information)	Retained for the duration of the passport's validity while the athlete or support personnel is actively carded, selected, or engaged for a Paralympic cycle. Once a passport expires, or an individual retires/departs the programme, the scanned copy will be securely and immediately deleted.
Registration and licensing data processed on behalf of externally managed National	Retained strictly for the duration of the athlete's active competitive career to facilitate annual licensing. Upon the athlete's

Governing Bodies (e.g., Powerlifting, Archery, Shooting)	retirement or departure, this data will be retained for a maximum of 6 years in line with standard participation data limits, after which it will be securely destroyed.
Granular daily performance metrics, sleep logs, fatigue monitoring, and physiological test results.	Retained in a personally identifiable format strictly for the duration of the active 4-year Paralympic cycle, or for as long as the athlete remains actively engaged in the high-performance programme. Upon conclusion of the cycle or withdrawal of consent, this raw data will be either securely deleted or irreversibly anonymised for longitudinal sports science research.
Data processed for administering partner or sponsor benefits (such as the Uber credit scheme)	Retained solely for the duration of the individual's active status as an athlete, provided the relevant commercial sponsorship agreement remains active.

Paralympics Ireland will recommend good practice guidelines to staff on retention of stored business emails.

10. International Transfers

PI will not transfer personal data to a Third Party outside of the EEA unless:

- The EU recognises the transfer country/territory as having an adequate level of data subject legal protection relating to personal data processing;
- The EU recognises the transfer mechanism as providing adequate protection when made to countries/territories lacking adequate legal protection; or
- All reasonable, appropriate and necessary steps have been taken to maintain the required level of Personal data Protection.

Where we engage data processors who store or process personal data outside the EEA (such as our Athlete Management System providers in the US or Australia), we ensure appropriate safeguards are strictly implemented, typically through the execution of EU-approved Standard Contractual Clauses (SCCs) or reliance on formal Adequacy Decisions.

Subject to the provisions above, the PI may transfer personal data to a Third Party outside of the EEA where any of the following apply:

- The transfer is necessary to protect the data subject's vital interests;
- The data subject has given explicit consent to the proposed transfer;
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the PI and a Third Party;
- The transfer is necessary or legally required for the establishment, exercise, or defence of legal claims; or
- The transfer is required by law.

PI will assess whether any of the above exceptions apply prior to any personal data transfer and must record the determination in writing.

11. Data Security

We have put in place appropriate technical and organisational security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Employees are aware of their roles and responsibilities when their role involves the processing of data. 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 strict instructions, and they are subject to a duty of confidentiality.

We have also put in place robust internal procedures to deal with any suspected personal data breach and will notify you and the Data Protection Commission (DPC) of a breach where we are legally required to do so.

11. Your Data Subject Rights

Under the GDPR, you possess several strict statutory rights regarding how your personal data is processed. You have the right to:

- Request Access to the personal data we hold about you, free of charge;
- Request Rectification of any inaccurate or out-of-date information;
- Request Erasure of your data (the 'right to be forgotten'), subject to certain statutory exemptions;
- Restrict Processing of your data in specific circumstances;
- Object to Processing, particularly where we rely on legitimate interests;
- Data Portability, allowing you to obtain and reuse your data across different services;
- Not be subject to Automated Decision-Making, including profiling (Please note Paralympics Ireland does not currently subject any personal data to automated decision-making processes);

- Withdraw Consent at any time, where our processing is based on your consent. Withdrawing consent will not affect the lawfulness of any processing conducted prior to your withdrawal.

We are legally obligated to respond to any valid rights request within one calendar month. If you have any questions or wish to exercise your rights, please contact us using the details provided in Section 15 below.

More information about your statutory legal rights can be found on the Data Protection Commission's (DPC) official website at https://www.dataprotection.ie/.

12. Social Media

Paralympics Ireland operates official social media accounts as part of its communications and engagement activities. Individuals who engage with Paralympics Ireland on social media platforms may have their personal data processed by those platforms in accordance with the platform's own privacy policies. Paralympics Ireland does not control the independent privacy practices of these third-party platforms.

Please refer to Appendix 2: Third-Party Privacy Policies for further information and links to the relevant privacy policies of the social media platforms used by Paralympics Ireland.

13. Photography and Media

Photographs and video recordings may be captured at Paralympics Ireland events, training sessions, and official activities for promotional, educational, and reporting purposes, including use on the Paralympics Ireland website, social media channels, and other communications.

Where appropriate, explicit consent will be obtained in accordance with data protection requirements. Paralympics Ireland is absolutely committed to upholding athlete dignity and privacy; explicit prior consent is strictly required before capturing or sharing any imagery in sensitive environments (such as medical areas or classification zones), or imagery depicting medical treatment or the removal of prosthetics.

You have the right to withdraw your media consent or request the removal of your image at any time. Upon receiving a valid request, we will initiate our takedown process and remove the imagery within 7 working days.

The use, storage, and management of photographic and digital media is governed in full by the Paralympics Ireland Digital Media, Social Media and Photography Policy.

14. Cookies

Paralympics Ireland uses cookies to support website functionality, enhance your browsing experience, analyse site traffic, and personalise content. Cookies are small text files placed on a user's device that enable the website to function effectively and provide information on how the website is used.

Upon your first visit to our website, you will be presented with a cookie settings banner allowing you to explicitly consent to and customise your cookie preferences. You can adjust or withdraw

your cookie consent at any time through the cookie settings panel accessible via the website footer or your privacy settings.

15. Contact us

Contact details:

Natalie O'Callaghan
Data Protection Compliance Manager
Paralympics Ireland
Sport Ireland Campus
Snugborough Road
Blanchardstown
Dublin 15, Ireland
Ph: 016251175
Email: privacy@paralympics.ie

Complaints

If you have any concerns or complaints about how we are handling your data please do not hesitate to get in touch with PI's Data Protection Compliance Manager in the first instance.

If you are dissatisfied with any aspect of PI's processing of your personal data, you have the statutory right to lodge a complaint directly with the Data Protection Commission (DPC).

Data Protection Commission – contact information

Phone – 1800 437 737 +353-1-765-0100

Webform – https://forms.dataprotection.ie/contact

Website – www.dataprotection.ie

Post – 6 Pembroke Row, Dublin 2, D02 X963

We consistently update and review our Privacy Notice. This Notice was last reviewed and updated in September 2026.

Appendix 1: Legal and Regulatory References

This Privacy Policy is informed by and operates in accordance with the following legislation and regulatory guidance:

General Data Protection Regulation (EU) 2016/679 (GDPR): https://eur-lex.europa.eu/eli/reg/2016/679/oj
Data Protection Act 2018 (Ireland):

https://www.irishstatutebook.ie/eli/2018/act/7/enacted/en/html
Data Protection Commission (Ireland): https://www.dataprotection.ie

Appendix 2: Third-Party Privacy Policies

Paralympics Ireland uses third party service providers and platforms that operate under their own privacy policies, including:

Meta Privacy Policy (Facebook and Instagram): https://www.facebook.com/privacy/policy/
LinkedIn Privacy Policy: https://www.linkedin.com/legal/privacy-policy
YouTube Privacy Policy: https://policies.google.com/privacy
TikTok Privacy Policy: https://www.tiktok.com/legal/privacy-policy
Bluesky Privacy Policy: https://bsky.social/about/support/privacy-policy
Teamworks Privacy Policy: https://teamworks.com/privacy-policy/
International Paralympic Committee (IPC SDMS) Privacy Policy:
https://www.paralympic.org/privacy
Mailchimp Privacy Policy: https://www.intuit.com/privacy/statement/
Google Privacy Policy: https://policies.google.com/privacy
Uber Privacy Policy: https://www.uber.com/legal/en/document/?name=privacy-notice