

# Web Privacy Policy

## Cookies and Web Privacy

### Introduction

The mission of Special Olympics Ireland (SOI) is to provide year-round sports training and athletic competition in a variety of olympic-type sports for children and adults with an intellectual disability, giving them continuing opportunities to develop physical fitness, demonstrate courage, experience joy and participate in a sharing of gifts, skills and friendships with their families, other Special Olympics athletes and the community. SOI is a registered charity (registered charity number CHY 7556).

This policy relates to our privacy practices in connection with the SOI website. We are committed to ensuring that personal data (also called “personal information”) that we collect, process and use is managed with the highest standards of security and confidentiality, strictly in accordance with the Data Protection Acts 1988 and 2003 (Ireland), the Data Protection Act 1998 (UK) (the “Acts”) and General Data Protection Regulation 2016/679 (the “GDPR”).

### Location of the SOI Web Privacy Policy

The SOI web privacy policy is located at the “Privacy Policy” link at the bottom right of each page of the website under **Resources**.

Our web privacy policy is a statement which covers the following areas to explain our approach to Data Protection. Please click on the headings below to see the relevant information:

- [Introduction](#)
- [Location of the SOI privacy policy](#)
- [Terms and Conditions](#)
- [Scope of our privacy policy](#)
- [What information does SOI hold on me?](#)
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### Terms and Conditions

Your use of the SOI website is bound by our **Terms and Conditions of Use** for the Special Olympics Ireland Website. This Privacy Policy is merely a statement of our Web Privacy Policy and commitment to data protection and is not subsidiary to the Terms of Use document. In the event of a conflict between the Privacy Statement and these Terms of Use, the Terms of Use shall prevail; link to Terms of Use is published under **Information** [here](#) on our website.

### Scope of our privacy policy

This privacy policy explains how we collect personal information via the website and how we use it. SOI’s Web Policy forms part of our overall **General Data Protection Policy**. Please visit our General Data Protection Policy under **Resources** [here](#) on our website.

Please make sure that you read this policy carefully. We are not responsible for the content or privacy practices of other websites. Any external links to other websites are clearly identifiable as such.

#### What information does SOI hold on me?

This privacy policy explains the purposes of the processing for which the personal data are intended as well as the legal basis for the processing.

## Collection and use of technical information

A cookie is a small piece of data that a website asks your browser to store on your computer or mobile device. The cookie allows the website to "remember" your actions or preferences over time.

More information about the nature and use of the cookies on the SOI website platform may be found at the dotnetnuke (DNN) website (this [link](#) takes you to an external website).

## How may I decline cookies?

The legal basis chosen by us for processing the cookies information on our website is consent obtained by implication. Generally, your computer or mobile device will have, under the website browser's "settings", a "privacy" option. You may be given the choice to accept, refuse or delete cookies at all times, or those from providers that the SOI website uses ("third party cookies") or those from specific websites.

Note: If you don't allow websites to save cookies, most websites that require you to sign in won't work. If you decline our cookies or ask for notification each time a cookie is being sent, this may affect your ease of use of the Site.

Like many websites, the website uses session cookies that are transferred to your computer for the duration of your visit. We actually set no first-party cookies, however we do employ services supplied by third parties that set their own cookies e.g. Google Analytics. Additional information may be collected through your use of the website. We use the session cookie to track your progress through the site, allowing us to maintain the security and integrity of the data being used.

Some of the technical information is used to create summary statistics that allow us to assess the number of visitors to our site, identify what pages are accessed most frequently and generally help us to make our site more user-friendly. Your information is anonymised prior to publication and we may use these statistics about website visits in the Special Olympics Ireland **Annual Review**; links to which are published under **Resources** [here](#) on our website.

For general web browsing no personal information is revealed to us, although certain statistical information is available to us via our internet service provider. This information may include:

- The logical address of the server you are using (in most cases this is the IP address)
- The top level domain name from which you access the Internet (e.g. ".ie", ".com", ".org")
- The type of browser you are using (e.g. Google Chrome, Firefox, Safari, Internet Explorer)
- The Internet address used to link to our site (this is the hardware address unique to the network card installed on your device)
- The date and time you access our site

Please visit our **Cookie Policy** [here](#) in this document.

## Direct marketing and profiling

We currently do not utilise automated decision-making processes. We will not use your data for direct marketing (including profiling) without your explicit consent. Some of our marketing emails have a tracking function used to help our marketers to gain insight into campaign performance. Consent to processing your personal information is in the form of an "Opt-in" and the marketing email includes an "Unsubscribe" feature.

You have the right to object to processing for the purpose of direct marketing (including profiling to the extent that it is related to direct marketing), at any time and free of charge.

## Collection and use of personal information

We collect personal information when you register or complete an online form on the website. We process personal information (non-sensitive information) which may include children's data. During the website user registration process, with your prior consent, you directly provide us with certain information, such as your name and email address and any services that you are subscribing to.

## Personal information categories

**Website user records:** We process this category of personal information when anyone using the website has expressed an interest in SOI events or activities, subscribes online to a specific SOI Update (or SOI's electronic magazine "ezine") or registers for the CONNECT newsletter (SOI's "ezine"). We process personal information when a website user registers for an event online. Consent to processing your personal information is in the form of an "Opt-in".

**Financial records:** This includes personal information provided by a donor, who has made a financial contribution to SOI. We actually do not process any personal information when you make a donation by text or online, however we

do employ services supplied by third parties that process payments e.g. LIKECHARITY (text) and Stripe (online). We process personal information when a donor makes a donation by direct debit, by post, by cheque / bank draft / money order / bank lodgement. Consent to processing your personal information is in the form of an “Opt-in”.

**Personnel records:** This includes volunteer personal information. Where a volunteer is still under 18, we will need to get consent from one of their parents or a guardian for them to volunteer. We process any documents requested from the volunteer applicant as part of the volunteer process. Consent, obtained when a website user completes a new volunteer application form online, is the basis for this processing.

When you apply to become a SOI volunteer, we request and hold on file any reference materials necessary to assess your application. The legal basis for this processing in Ireland is the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012 to 2016 and in Northern Ireland it is the Safeguarding Vulnerable Groups (NI) Order 2007 (as amended by the Protection of Freedoms Act 2012), (“the SVGA”). No volunteering can commence until a vetting disclosure has been received, viewed and assessed. We process all information and documentation as requested by us in compliance with our Volunteer Registration Policy. This includes information from employers and An Garda Síochána. We process personal information when an existing volunteer creates a profile for re-vetting online and when volunteers register for specific SOI events and activities.

**Other records:** Anyone who makes a complaint or enquiry. If, for example, you email our “info” address or phone our “for enquiries” number the contact details you have provided will be shared as appropriate so that your issue may be addressed.

### Retention periods

We retain information in line with the purpose for which it was originally collected or lawfully further processed. We may retain personal information for a longer period of time if we are required to do by law. There may be occasions where there are business or historical purposes that deem it appropriate to retain records for longer than the statutory retention period.

SOI’s retention decisions are based on the following considerations:

- Historical value of the information
- Legal or regulatory requirements
- Good practice
- Administrative or operational needs

## Disclosure of who we share your information with

We may share your personal information on a collective basis with data processors to process data on our behalf. Whenever we do this, we will ensure that we have appropriate Data Processor Agreements in place, ensuring processing be subject to suitable safeguards.

We do not share your personal information without your consent, unless allowed by legislation, legitimate business interest or for the performance of a contract. Examples of organisations we may share your information with, where appropriate, are:

Organisation	Type of information shared
An Garda Síochána	Garda Vetting Application Online; on applications made in Ireland
AccessNI	ID Validation; on applications made in Northern Ireland (NI)
Services	e.g. distribution of newsletters
LIKECHARITY	Service provider for SOI donate by text
MailChimp	Service provider for SOI marketing automation
Stripe	Service provider for SOI online donations
Revenue Irish Tax and Customs	Tax relief on donations made in Ireland (ROI)
HM Revenue and Customs (HMRC)	Tax relief on donations made in NI

## Transfers of personal information outside Europe

In certain cases it may be necessary for us to share your data within the wider Special Olympics organisation including to regions outside of the European Economic Area (EEA). The privacy protections in these jurisdictions may not be equivalent to those in Europe. We will only transfer your personal data outside of the EEA where permitted to do so by European law and will take reasonable steps to ensure appropriate safeguards are put in place relating to the transfer e.g.

- model contractual clauses and
- Privacy Shield.

SOI currently uses a US-based customer relationship management (CRM) tool and the company who provides this service has self-certified under the EU-US Privacy Shield Framework. This CRM tool is used by SOI for maintaining our relationships with our donors, supporters, volunteers, athletes and their families.

## Security of information

In Ireland, some of the requirements relating to “security of processing” are governed by the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 (the 2011 Regulations). In the UK this is covered by the Privacy and Electronic Communications (EC Directive) Regulations 2003 (“the PECR”). All SOI laptops and USB keys are encrypted. We are acutely aware of our responsibility to train employees and volunteers on their data protection responsibilities.

We have industry standard technological processing safeguards to protect your personal information. We have a number of physical security measures in place, such as office security and confidential destruction of all waste paper.

Please play your part in keeping your personal information secure by keeping your login details secret and by choosing a strong password.

## Your rights

Any personal information which you choose to send to us via the website will be treated with the highest standards of security and confidentiality, strictly in accordance with the GDPR. These rights include:

1. Right of access;
2. Right to rectification;
3. Right to be forgotten / erasure;
4. Right to restrict processing;
5. Right to object;
6. Right to refuse automated decision making and/ or profiling;
7. Right to portability.

Where consent is the basis for processing, it must be specific to the purpose of the processing, and you have the right to withdraw your consent. The age at which children can consent to Internet services is in accordance with the currently applicable Irish data protection law and not below 13 years as set out under European law.

You may [contact us](#) to seek a resolution of the complaint or enquiry in the first instance. As part of your fundamental right to data privacy, you have the right to lodge a complaint with the [Data Protection Commissioner](#), the supervisory authority in Ireland where the operations of SOI, the data “controller”, is based.

## Changes to our privacy policy

If this privacy policy changes in any way, we will place an updated version on this webpage. We keep our privacy policy under regular review. Regularly reviewing this page ensures you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

If you continue to use our services after the date any revised privacy policy comes into force, you will be deemed to have consented to the revised version.

## How to contact us

The registered office of SOI, the data “controller”, is based in the EEA. We do not have a Data Protection Officer. However, we have voluntarily appointed a Data and Records Manager to which our data protection related tasks have been assigned. You may exercise your statutory data protection rights by writing to us;

**Name:** Data and Records Manager, Operations,  
**Address:** Special Olympics Ireland Central Office, National Sports Campus, Snugborough Road, Dublin 15, D15 PC63, Ireland  
**Email:** [data@specialolympics.ie](mailto:data@specialolympics.ie)  
**Telephone:** +353 1 869 1614 (direct)  
+353 1 882 3972 (reception)  
**Website:** [www.specialolympics.ie](http://www.specialolympics.ie)

## Contact details for the data protection commissioner

**Postal Address:** Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23, Ireland.  
(Portarlinton Office)  
**Email:** [info@dataprotection.ie](mailto:info@dataprotection.ie)  
**Telephone:** +353 57 8684800 / +353(0)761 104 800 / Lo Call No. 1890 252 231  
**Fax:** +353 57 868 4757  
**Website:** <https://www.dataprotection.ie>

Thank you for reading our Web Privacy Policy. If you have a query about this statement you may email us at [data@specialolympics.ie](mailto:data@specialolympics.ie) or write to us through the Data and Records Manager [contact details](#) above.

# Cookie Policy

Special Olympics Ireland's (SOI's) Cookie policy forms part of our overall Web Privacy Policy. Please visit our **Web Privacy Policy** [here](#) in this document.

## What is a cookie?

A cookie is a small piece of data that a website asks your browser to store on your computer or mobile device. The cookie allows the website to "remember" your actions or preferences over time.

The use of cookies is in accordance with the currently applicable European Commission guidelines. Cookies fall under the scope of the General Data Protection Regulation (GDPR) because online identifiers, such as cookies, when combined with other information gathered by websites, may potentially be used to create profiles of and identify website users.

More information about the legal basis for cookies may be found at the European Commission website (this [link](#) takes you to an external website).

More information about the nature and use of cookies on the SOI website platform may be found at the dotnetnuke (DNN) website (this [link](#) takes you to an external website).

## Location of the SOI Cookie Policy

The SOI Cookie policy is located at the "Privacy Policy" link at the bottom right of each page of the website.

Our cookie policy covers the following areas to explain our approach to Data Protection. Please click on the headings below to see the relevant information:

- [What is a cookie?](#)
- [Location of the SOI cookie policy](#)
- [Cookies used by this website](#)
- [Changes to our cookie policy](#)

## Cookies used by this website:

This site uses 2 different types of cookie:

- Session Cookies
- Persistent Cookies

### Session cookies

Session Cookies are temporary cookies that are not stored on your computer or mobile device. One of the session cookies is a Google Analytics one and it is used to note that the visit has ended when the browser is closed. Another session cookie is used to remember your language preference when viewing the website.

### Persistent cookies

Persistent cookies are those placed on your computer or mobile device and will expire at a pre-determined length of time from when you last visited this website. One of the persistent cookies is an anonymous authentication cookie which is used to depersonalise your information.

### Use of cookies on this website

Cookie Name	Description	Expiration (from last visit)
<b>__ASPXANONYMOUS</b>	An anonymous authentication cookie. It stores a unique ID for anonymous users for which can be used to track data for individual users.	As per the default value of 100000 minutes (69 days, 10 hours, and 40 minutes). Approx. 10 weeks
<b>__utma</b>	A Google Analytics ga.js JavaScript library cookie used to distinguish users and sessions. The cookie is created when the JavaScript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.	2 years from set/ update
<b>__utmb</b>	A Google Analytics ga.js JavaScript library cookie used to determine new sessions/visits. The cookie is created	30 mins from set/ update

Cookie Name	Description	Expiration (from last visit)
	when the JavaScript library executes and no existing <code>_utmb</code> cookies exists. The cookie is updated every time data is sent to Google Analytics.	
<code>__utmc</code>	A Google Analytics ga.js JavaScript library cookie used to determine whether the user was in a new session/visit.	Session (end of browser session)
<code>__utmt</code>	A Google Analytics ga.js JavaScript library cookie used to throttle request rate.	10 minutes
<code>__utmz</code>	A Google Analytics ga.js JavaScript library cookie which stores the how the user reached this website. The cookie is updated every time data is sent to Google Analytics.	6 months from set/ update
<code>_gat</code>	A Google Analytics analytics.js JavaScript library cookie used to throttle request rate.	1 minute
<code>_ga</code>	A Google Analytics analytics.js JavaScript library cookie used to distinguish users.	2 years
<code>_gid</code>	A Google Analytics analytics.js JavaScript library cookie used to distinguish users.	24 hours
<code>language</code>	Used to remember your language preference when viewing the website e.g. "en-IE"	Session (end of browser session)

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If you continue to use our services after the date any revised cookie policy comes into force, you will be deemed to have consented to the revised version.

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