Rásaíocht Con Éireann/Greyhound Racing Ireland

WEBSITE PRIVACY NOTICE

1 INTRODUCTION

1.1 Rásaíocht Con Éireann/Greyhound Racing Ireland operate and manage the website www.grireland.ie **(the Site")**. Greyhound Racing Ireland is a commercial semi state body set up under legislation for the regulation and development of the greyhound industry in Ireland.

1.2 GRI respects your privacy and is committed to protecting your personal data ("**Data**"). This Privacy Notice will inform you as to how we safeguard your personal data when you visit our Site (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1.3 This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the Privacy Notice.

2 WHEN DOES THIS PRIVACY NOTICE APPLY?

2.1 This **Privacy Notice together** with **the Cookie Policy sets** out the Data that we collect, use, and otherwise process in connection with your use of our Site. The Data we process will depend on how you use our website.

2.2 This Site is not intended for children, and we do not knowingly collect data relating to children. Age verification is requested on registration and anyone under 18 will be unable to register for our website services.

2.3 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. It is important that you are fully aware and informed of how and why we are using your Data. This Privacy Notice supplements other notices and is not intended to override them.

2.4 We will use your Data only for purposes and in the manner set forth below, which also describes the steps we take to ensure the processing of your Data is in compliance with data protection law. This includes compliance with the General Data Protection Regulation (EU) 2016/679 and Data Protection Acts 1988 and 2018 and any subsequent data protection and privacy legislation or amendments thereof (collectively referred to as "**Data Protection Legislation**").

3 DATA CONTROLLER IDENTITY

3.1 For the purposes of Data Protection Legislation, the Data Controller of the Site is Greyhound Racing Ireland/ Rásaíocht Con Éireann having its registered office at Greenpark, Dock Road, Limerick (hereinafter "**GRI**", "**us**", "**we**" or "**our**"). GRI/RCÉ - is a commercial semi-state body that is responsible for the control and development of the greyhound industry in the Republic of Ireland.

4 DATA PROTECTION OFFICER CONTACT DETAILS

4.1 We have a Data Protection Officer ("**DPO**") who oversees questions in relation to this Privacy Notice. If you have any questions, please contact the DPO using the details set out below.

4.2 The contact details of our DPO are as followings:

Email address: dataprotectionofficer@grireland.ie

Postal address: Data Protection Officer, Greyhound Racing Ireland, Greenpark, Dock Road, Limerick, V94 Y17X

5 THE DATA WE MAY COLLECT ABOUT YOU

5.1 When you visit or use the Site in any way, we may collect and process different types of information about you. We use different methods to lawfully collect personal data on the basis set out below:

5.2 We do not collect any Special Categories of Personal Data about you related to race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, or information about genetic and biometric data). Nor do we collect any information about criminal convictions and offences. It may be necessary to collect information regarding health in relation to special dietary requirements or information regarding a disability when you are making a booking in one of our restaurants. Information related to health will only be obtained with your explicit consent to meet your requirements.

5.3 Personal data is provided to GRI/GRÉ by the Irish Coursing Club, Davis Road, Clonmel Co. Tipperary E91 N9P9. The Irish Coursing Club (ICC) has responsibility for the registration and microchipping of all greyhounds and acts as Joint Controller with GRI for greyhound regulatory purposes. As joint controllers the parties have in place a Joint Controller Arrangement in accordance with Article 26 of the GDPR Regulation. The ICC shares personal data related to the registration and ownership of greyhounds with GRI on a regular basis to allow GRI process data for greyhound racing and regulation purposes. This includes greyhound trials, racing, sales, prizemoney payments, testing and analysis to identify and prosecute cases related to adverse analytical findings and greyhound welfare breaches. We process personal data for all greyhound regulation, traceability, and welfare purposes, in the exercise of our official authority as provided by legislation.

5.4 RCÉ/GRI, the Greyhound Racing Control Committee and the Greyhound Racing Appeal Committee collect, use and share relevant personal data as necessary to discharge their respective statutory responsibilities under the Greyhound Industry Act 1958 and the Greyhound Racing Act 2019, as amended. RCÉ/GRI investigates alleged breaches of the Racing code and refers appropriate matters to the Control Committee. The Control Committee independently determines whether a sanction breach has occurred and imposes any applicable racing sanction. The Appeal Committee independently hears and determines appeals against Control Committee decisions. Personal data, including identification details, correspondence, evidence and hearing and decision records, is processed to investigate matters, administer proceedings, determine cases and give effect to decisions. This processing is necessary for the performance of tasks carried out in the public interest or in the exercise of official authority under Article 6(1)(e) GDPR. Records are retained only for as long as necessary for these purposes, taking account of statutory record-keeping obligations, appeals and legal proceedings. When no longer lawfully required, personal data is securely deleted or destroyed.

5.5 We collect and process your personal data when you interact directly with us (e.g., where greyhound owners or trainers provide personal data to GRI for greyhound trainer or kennel hand registration, or interactions related to greyhound trials, racing or sales entries.

5.6 We collect and process personal data to investigate and prosecute greyhound welfare breaches and/or to investigate and prosecute adverse analytical findings as provided by legislation.

5.7 We collect and process personal data to facilitate greyhound owners/trainers/greyhound enthusiasts to view race cards, race results, greyhound lineage, racing history and statistics.

5.8 We collect and process personal data when you make a restaurant booking or subscribe to receive email or SMS updates related to the services we provide.

5.9 We collected and process personal data through our National Sales and Reservation's Office for completion of restaurant and admission online bookings.

5.10 We collect and process personal data for registration and processing of Tote betting transactions through GRI's Barkingbuzz App.

5.11 We collect and process personal data through automated technologies such as Cookies. For further information, please read our Cookie Policy on how you can enable/disable them.

5.12 We photograph, film, record and broadcast our events at greyhound stadia in which case we may process personal data such as your voice, likeness, and image if you are identifiable from photographs, film, recordings, or broadcasts.

5.13 We collect and process personal data through our CCTV systems at greyhound stadia for regulatory, safety and security purposes in accordance with law and our CCTV policy.

5.14 Where we need to collect personal data by law, or under the terms of a contract and you fail to provide that data when requested, we may not be able to provide the service or fulfil the contract with you or the contract we are trying to enter with you. In this case, we may not be able to fulfill our obligations in respect of our contract with you and may have to cancel the request, but we will notify you if this is the case at the time.

5.13 PURPOSE FOR WHICH WE WILL USE YOUR DATA

Data Subject Category	Type of Data	Purpose of processing	Legal basis of processing
Registered Greyhound Users	• First Name • Surname • Phone number • Email • Date of Birth • Gender • Username (for logging into the website) • Password • Reminder question • Reminder answer • Address • Country • County (optional) • Postcode (optional) • Bank details related to prize money payments.	This data enables us to provide you with information about your registration or accounts. It also allows the registered greyhound users to log into the website. From here they can: a. Book trial sessions or race entries at each greyhound track. b. Select/manage up to five greyhounds to 'follow' – that is they can subscribe to receive race entry and race results information on 5 greyhounds at any one time. The information can be sent via email, text, or both. c. Facilitate the publication of racing results and allow owners/trainers/ racing enthusiasts to view same. d. To comply with greyhound racing, traceability, and welfare regulations.	**The exercise of official authority vested in GRI as data controller.**
Greyhound owners and trainers.	Greyhound ownership, identity, and traceability data.	Greyhound traceability for regulatory, welfare and greyhound rehoming purposes.	**The exercise of official authority vested in GRI as data controller.**
RCÉ/GRI, the Control Committee and Appeal Committee	The processing of personal data relates to: • identification and contact information • licensing and registration records	e. Personal data related to disciplinary and appeal proceedings under the Greyhound Racing Act 2019 is processed by Greyhound Racing Ireland ("GRI"), the Control Committee and the Appeal Committee as required.	**The exercise of official authority vested in GRI, the Control Committee and Appeal Committee as**

	• ownership and training records • disciplinary history • correspondence • witness evidence • steward reports • laboratory and testing results • hearing recordings and transcripts • legal submissions • investigation materials • case files • governance records • meeting minutes • adjudication and decision records • publications • financial information relating to fines or sanctions • and special category data where necessary pursuant to Articles 9(2)(f) and 9(2)(g) GDPR and applicable law. • Exchange of personal data between the Irish Coursing Club (ICC), the body with responsibility for the registration of greyhound ownership and RCÉ/GRI. • Exchange of personal data between the Greyhound Board of Great Britain and RCÉ/GRI for cross jurisdictional regulatory purposes.		
Betting Customers		f. Barkingbuzz: the registration process also allows the person to log into our second website	**Contract**

	For registration and verification purposes we collect the following data: Proof of identity: • A valid passport • A current driving licence. • A National Age Card (issued by An Garda Síochána) Proof of address: A current utility bill (such as a gas, electricity or telephone or mobile phone bill) • A current car or home insurance policy that shows your address • A document issued by a government department that shows your address • A social insurance document (that shows your address)	https://barkingbuzz.grireland.ie/ which is our tote site. The username/password data is used to allow the person to log into www.grireland.ie and https://barkingbuzz.grireland.ie/ The email/phone details are used to send information to greyhound followers about race results/race entries. The email details are used for 'forgot password' functionality. Reminder question/Reminder answer are used for 'forgot password' functionality. Date of birth used in barkingbuzz as part of validating age (over 18 etc).	
Customers registered or active on the Tote betting website Barking Buzz) **(Shared via the 3rd Party app Sportech.**	We hold on file customers booking information including: (i) Name (i) Phone Number (ii) Email address (iii) Betting transactions e.g., a bet was placed on a specific race. The following is provided, through the 3rd Party app, but we do not hold records of: i. Credit Card or payment details. ii. Betting wins or losses and resulting transactions. iii. Customer balance	Tote betting information is processed via our Tote partners, a 3rd party, called Sportech. Our Tote staff may access customer information to assist the customers with their transactions and queries, and for credit card fraud checks.	**Contract**

All website users	Cookies, which includes: The logical address of the server you are using. The top-level domain name from which you access the Internet (for example, .i.e. .gov, .com, .edu, .org, etc). The type of browser you are using. The date and time you access our site. The pages you have accessed, and the documents downloaded. The previous Internet address from which you linked directly to our site. Some of the search criteria you are using. The internet address to which you link directly from our site. This is currently listed on our website at https://www.grireland.ie/footer-nav-corporate/Privacy-Policy.	Cookies allow websites to store things like user preferences and carry out statistical analyses and market research. You can think of cookies as providing a 'memory' for the website, so that it can recognise you when you come back and respond appropriately in the most effective responsive and compatible manner for you and for your computer or device. Cookies enable us to provide you with personalised services on our site and improve the services we provide to you, including investigating any improper of our services or the network.	**Consent**
Customers (making a booking for restaurant, admission, or group package) (Shared via the 3rd Party app ResDiary)	We hold on file the customers booking information including: (iv) Name (v) Phone Number (vi) Email address (vii) Booking / package details The following is provided, through the 3rd Party app, but we do not hold records of: (i) Credit Card or payment details	This information is used to assist our sales and stadium team to fulfil the customer booking. To analyse your online purchases on our websites or partner websites that we have redirected you to (for example, what you have bought, when and where you have bought it and how you paid for it), customer bookings database and table optimisation in restaurants. Where the customer has opted-in to receive marketing emails, this information is passed to our third-party service provider.	**Contract** **Consent** **Consent**
Customers (subscribing for email or SMS updates)	Email Telephone Number	Where the customer has opted-in to receive marketing emails, this information is passed to our third-party service provider.	**Consent**

		Where the customer has consented to receive text alerts, this information is used to send information to greyhound followers about race results/race entries. This information is processed via our third-party service provider.	
Employees, visitors, and customers	CCTV images and voice captured during events through filming, recording and photography. CCTV monitoring for safety, security and compliance with greyhound racing regulations.	GRI has a legitimate interest in filming and photography at its venues during events for promotional, regulatory, and archival purposes. Footage, imagery, and voice may be broadcast via television, radio, social media platforms and the GRI website at www.grireland.ie CCTV operates at this venue for safety, security, and racing regulatory purposes.	**Legitimate interest**

6 DISCLOSING YOUR DATA

6.1 We consider your Data to be private and confidential.
We may access and/or disclose your Data if required to do so by law or in good faith and belief that such action is necessary to: (a) conform with the law or comply with legal process served on us; (b) protect and defend our rights or property including, without limitation the security and integrity of our network and systems; or (c) act under exigent circumstances to protect the personal safety of users of our services or members of the public.

6.2 We may disclose your personal data to our insurers and/or professional advisers insofar as is reasonably necessary for the purpose of maintaining insurance cover, managing risks, or obtaining professional advice.

6.3 Greyhound data along with some of the owner's personal data is displayed on our websites for various purposes. This includes facilitating our customers review greyhound breeding and racing performance, greyhound welfare and/or rehoming and for betting and/or purchasing greyhounds.

6.4 Where adverse analytical findings are established in accordance with greyhound industry regulations, the names of the registered owner and the licenced trainer, including the time and the place at which the said sample was taken will be published on our website.

7. SERVICE PROVIDERS

7.1 We use third part service providers who work for us in the provision of our services to you. In providing these services and where necessary, relevant personal data is processed by the service provider on our behalf.

7.2 We assess the data processors we use to ensure they can provide sufficient guarantees regarding the confidentiality and security of your personal data.

8. DISCLOSURE TO THIRD PARTIES

8.1 In certain circumstances, we may share and/or may be obliged to share your Data with third parties for the purposes described above and in accordance with Data Protection Legislation. We may disclose your personal data where such disclosure is necessary for compliance with a legal obligation, to which we are subject, or to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out of court procedure.

9 TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

9.1 Your Data may be transferred, stored, and processed in one or more countries outside the European Economic Area("**EEA**"), for example, when one of our service providers use employees or equipment or sub processors based outside the EEA. Where this is the case, we will ensure that we have in place appropriate agreements for the international transfer of your personal data with the service provider in compliance with the law.

10. HOW LONG WILL WE USE YOUR DATA FOR

10.1 We keep your personal data for as long as it is necessary to fulfil the purposes for which it was collected as described above, including for the purposes of satisfying any legal, accounting, or reporting requirements.

11. LINKS TO OTHER SITES

11.1 Our Site contains links to and from other websites and web platforms. In addition, third parties' websites may also provide links to the Site. If you follow a link to any of those websites or web platforms, please note that those websites and web platforms have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you give any personal data to those websites.

11.2 We do not accept, and we disclaim, any responsibility for the privacy policies and information protection practices of any third-party website (whether such website is linked on or to the Site). These links are provided to you for convenience purposes only, and you access them at your own risk. It is your responsibility to check the third-party website's privacy statement before you submit any personal data to their websites.

12. SECURITY

12.1 We will use appropriate technical and physical security measures to protect your personal data which is transmitted, stored, or otherwise processed by us, from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access.

12.2 Access is only granted to Data on a need-to-know basis to those people whose roles require them to process your personal data. In addition, our service providers are also selected carefully and required to use appropriate protective measures.

12.3 As effective as modern security practices are, no physical or electronic security system is entirely secure. The transmission of information via the internet is not completely secure. Although we will do our best to protect your Data, we cannot guarantee the security of your Data transmitted to our Site. Any transmission of Data is at your own risk. Once we receive your Data, we will use appropriate security measures to seek to prevent unauthorised access. We will continue to revise policies and implement additional security features as new technologies become available.

13. YOUR RIGHTS

a. You have various rights under Data Protection Legislation. However, in certain circumstances, these rights may be restricted. Your rights may be restricted where this is necessary: (i) for the prevention, detection, investigation, and prosecution of criminal offences, and/or (ii) in contemplation of or for the establishment, exercise or defense of a legal claim or legal proceedings (whether before a court, tribunal, statutory body or an administrative or out-of-court procedure).

b. Subject to the above, your rights under Data Protection Legislation may include (as relevant):

Your right	What does it mean?	How do I execute this right?	Conditions to exercise?
Right of access	Subject to certain conditions, you are entitled to have access to your personal data which we hold (this is more commonly known as submitting a "data subject access request").	Requests for such information should be made in writing to to Data Protection Officer by email dataprotectionofficer@grireland.ie and/or by post to Data Protection Officer, Greyhound Racing Ireland, Greenpark, Dock Road, Limerick. If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations.	We must be able to verify your identity. Your request may not affect the rights and freedoms of others, e.g., privacy and confidentiality rights of other individuals and/or businesses.
Right of data portability	Subject to certain conditions, you are entitled to receive the data which you have provided to us and which is processed by us by automated means, in a commonly used machine readable format.	Requests for such information should be made in writing to to Data Protection Officer by email dataprotectionofficer@grireland.ie and/or by post to Data Protection Officer, Greyhound Racing Ireland, Greenpark, Dock Road, Limerick. If possible, you should specify the type of information you would like to see to ensure that our disclosure meets your expectations.	The GDPR does not establish a general right to data portability. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (e.g., not for paper records). It affects only personal data that was "provided" by you. Therefore, it does not, as a rule, apply to personal data that was created by the IGB or supplied to the IGB by any other individual and/or business.
Rights in relation to inaccurate personal or incomplete data	You may challenge the accuracy or completeness of personal data which we process about you. If it is found that personal data is inaccurate, you are entitled to have the inaccurate data removed, corrected or completed, as appropriate.	We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details. Requests for such information should be made in writing to to Data Protection Officer by emaildataprotectionofficer@grireland.ie and/or	This right only applies to your own personal data. When exercising this right, please be as specific as possible.

Your right	What does it mean?	How do I execute this right?	Conditions to exercise?
		by post to Data Protection Officer, Greyhound Racing Ireland, Greenpark, Dock Road, Limerick.	
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	Requests for such information should be made in writing to to Data Protection Officer by email dataprotectionofficer@grireland.ie and/or by post to Data Protection Officer, Greyhound Racing Ireland, Greenpark, Dock Road, Limerick.	This right applies only if the processing of your personal data is necessary for the performance of a task carried out in the public interest (see "*basis of processing*" above). Objections must be based on grounds relating to your situation. They must not be generic so that we can demonstrate that there are still lawful grounds for us to process your personal data.
Right to have personal data erased	Subject to certain conditions, you are entitled, on certain grounds, to have your personal data erased (also known as the *"right to be forgotten"*), e.g., where you think that the information, we are processing is inaccurate, or the processing is unlawful.	Requests for such information should be made in writing to to Data Protection Officer by email dataprotectionofficer@grireland.ie and/or by post to Data Protection Officer, Greyhound Racing Ireland, Greenpark, Dock Road, Limerick.	There are various lawful reasons why we may not be able to erase your personal data. This may apply (i) where we must comply with a legal obligation, (ii) in case of bringing legal proceedings or defending legal proceedings, or (iii) where retention periods apply by law or under the GRI's internal data retention policies.
Right to withdrawal	You have the right to withdraw your consent to any processing for which you have previously given that consent.	Requests for such information should be made in writing to to Data Protection Officer by email dataprotectionofficer@grireland.ie and/or by post to Data Protection Officer, Greyhound Racing Ireland, Greenpark, Dock Road, Limerick.	If you withdraw your consent, this will only take effect for the future.

14 COMPLAINTS

14.1 If you are unhappy about any aspect of the way we collect, share, or use your personal data, please let us know using the contact details set out above.

14.2 You also have a right to complain to the Office of the Data Protection Commission at 21 Fitzwilliam Square, Dublin 2, D02 RD28 by telephone at 01 7650100 / 1800437 737 and/or by email to info@dataprotection.ie.

14. CHANGES TO OUR PRIVACY NOTICE

We reserve the right to change this Privacy Notice at any time in our sole discretion. If we make changes to this Privacy Notice they will be posted on the Site so that you are always aware of what information we gather, how we might use that information and in what circumstances we may disclose it. By continuing to use our website after we post any such changes, you accept and agree to this Privacy Statement as modified.