

WEBSITE PRIVACY STATEMENT

1 INTRODUCTION

- 1.1 This www.grireland.ie website (the "Site") is operated by Greyhound Racing Ireland ("GRI").
- 1.2 The GRI respects your privacy and is committed to protecting your personal data ("Data"). This Privacy Statement will inform you as to how we look after your personal data when you visit Site (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

2 WHEN DOES THIS PRIVACY STATEMENT APPLY

- 2.1 This Privacy Statement **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 is requested on registration and anyone under 18 will not be able to register for our website services.
- 2.3 It is important that you read this Privacy Statement 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 Statement supplements the other notices and is not intended to override them.
- 2.4 We will use your Data only for the purposes and in the manner set forth below, which describes the steps we take to ensure the processing of your Data is in compliance with the Data Protection Acts 1988 and 2003 (as amended) and any subsequent data protection and privacy legislation, European Union Law including Regulation (EU) 2016/679, known as the General Data Protection Regulation or GDPR and any subsequent amendments (collectively referred to as "**Data Protection Legislation**").

3 IDENTITY OF THE CONTROLLER OF THE DATA

- 3.1 For the purposes of the Data Protection Legislation, the Data Controller of the Site is GRI, having its registered office at Greenpark, Dock Road, Limerick (hereinafter "**GRI**", "**us**", "**we**" or "**our**").

4 CONTACT DETAILS OF THE DATA PROTECTION OFFICER

- 4.1 We have appointed a Data Protection Officer ("**DPO**") who is responsible for overseeing questions in relation to this Privacy Statement. If you have any questions about this Privacy Statement, 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.
- 5.2 We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.
- 5.3 Where we need to collect personal data by law, or under the terms of a contract we have with you 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. In this case, we may not be able to fulfill our obligations in respect of our contract with you and will have to cancel the particular request but we will notify you if this is the case at the time.
- 5.4 We use different methods to collect data from you, which are as follows:
- (i) Direct Interactions (i.e. customer provides the information for the purposes of registering, completing a booking, or subscribing to receive email or SMS updates);
 - (ii) Automated Technologies / Cookies as outlined in our Cookie Policy; and
 - (iii) Third Parties e.g. ResDiary for completion of restaurant, group or admission online booking and Sportech for Tote betting transactions Via Barking Buzz.
- 5.5 PURPOSE FOR WHICH WE WILL USE YOUR DATA

Category	Type of Data	Purpose of processing	Legal basis of processing
Registered Greyhound Users	<ul style="list-style-type: none"> • First Name • Surname • Phone number • Email • Date of Birth • Gender • User name (for logging into the website) • Password • Reminder question • Reminder answer • Address • Country • County (optional) • Postcode (optional) 	<p>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:</p> <ul style="list-style-type: none"> a. book trial sessions at each greyhound track b. select/manage up to five dogs 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 or text or both. c. Barkingbuzz: the registration process also allows the person to log into our second website which is our tote site. <p>The username/password data is used to allow the person to log into www.grireland.ie and barkingbuzz.</p> <p>The email/phone details are used to</p>	Consent

		<p>send information to greyhound followers about race results/race entries</p> <p>The email details are used to in 'forgot password' functionality</p> <p>Reminder question/Reminder answer are used to in 'forgot password' functionality</p> <p>Date of birth used in barkingbuzz as part of validating age (over 18 etc)</p>	
All website users	<p>Cookies, which includes:</p> <p>The logical address of the server you are using.</p> <p>The top level domain name from which you access the Internet (for example, .ie .gov, .com, .edu, .org, etc).</p> <p>The type of browser you are using.</p> <p>The date and time you access our site.</p> <p>The pages you have accessed and the documents downloaded.</p> <p>The previous Internet address from which you linked directly to our site.</p> <p>Some of the search criteria you are using.</p> <p>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.</p>	<p>Cookies allow websites to store things like user preferences and carry out statistical analyses and market research.</p> <p>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.</p> <p>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.</p>	Consent
Customers (making a booking for restaurant, admission or group	<p>We hold on file the customers booking information including:</p> <p>(i) Name</p> <p>(ii) Phone</p>	<p>This information is used to assist our sales and stadium team to fulfil the customer booking and 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</p>	Consent

<p>package) (Shared via the 3rd Party app ResDiary)</p>	<p>Number</p> <p>(iii) Email address</p> <p>(iv) Booking / package details</p> <p>The following is provided, through the 3rd Party app, but we do not hold records of:</p> <p>(i) Credit Card or payment details</p>	<p>you have bought it and how you paid for it) Where the customer has opted-in to receive marketing emails, this information is passed to a 3rd party, Digital 24, to add to our email database.</p>	
<p>Customers (subscribing for email or SMS updates)</p>	<p>Email</p> <p>Telephone Number</p>	<p>Where the customer has opted-in to receive marketing emails, this information is passed to a 3rd party, Digital 24, to add to our email database.</p> <p>Where the customer has opted-in to receive text alerts, this information is used to send information to greyhound followers about race results/race entries. This information is processed via a 3rd party application, Clickatell.</p>	<p>Consent</p>
<p>Customers (registered or active on the Tote betting website Barking Buzz) (Shared via the 3rd Party app Sportech)</p>	<p>We hold on file the customers booking information including:</p> <p>(i) Name</p> <p>(ii) Phone Number</p> <p>(iii) Email address</p> <p>(iv) Betting transactions e.g. a bet was placed on a specific race</p> <p>The following is provided, through the 3rd Party app, but we do not hold records of:</p> <p>(i) Credit Card or payment</p>	<p>Tote betting information is processed via our Tote partners, a 3rd party, called Sportech.</p> <p>Our Tote staff may access customer information in order to assist the customer with their transactions and queries, and also for credit card fraud checks.</p>	<p>Consent</p>

	details		
	(ii) Betting wins or losses and resulting transactions		
	(iii) Customer balance		

6 TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

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 based outside the EEA.

7 DISCLOSURE OF YOUR DATA

7.1 We consider your Data to be private and confidential.

7.2 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.

7.3 Service Providers

We use third party service providers who work for us in the provision of our services. In providing the services, your Data will, where applicable, be processed by the service provider on our behalf.

We will check any third party that we use to ensure that they can provide sufficient guarantees regarding the confidentiality and security of your Data. We will have written contracts with them which provide assurances regarding the protections that they will give to your Data and their compliance with our data security standards and international transfer restrictions.

7.4 Disclosure to Third Parties

In certain circumstances, we may share and/or are obliged to share your Data with third parties for the purposes described above and in accordance with Data Protection Legislation.

8 HOW LONG WILL WE USE YOUR DATA FOR

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

9 LINKS TO OTHER SITES

9.1 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 submit any personal data to those websites.

9.2 We do not accept, and we disclaim, any responsibility for the privacy policies and information protection practices of any third party website (whether or not 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.

10 SECURITY

10.1 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.

10.2 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.

10.3 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.

11 YOUR RIGHTS

11.1 You may have various rights under Data Protection Legislation. However, in certain circumstances, these rights may be restricted. In particular, 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 defence of a legal claim or legal proceedings (whether before a court, tribunal, statutory body or an administrative or out-of-court procedure).

11.2 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 Data Protection Officer by email dataprotectionoffice@greireland.ie and/or by post to Data Protection Officer, Greyhound Racing Ireland, Greenpark, Dock Road, Limerick. If	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.

Your right	What does it mean?	How do I execute this right?	Conditions to exercise?
		<p>possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations.</p>	
<p>Right of data portability</p>	<p>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.</p>	<p>Requests for such information should be made in writing to to Data Protection Officer by email dataprotectionoffice@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.</p>	<p>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 GRI or supplied to the GRI by any other individual and/or business.</p>
<p>Rights in relation to inaccurate personal or incomplete data</p>	<p>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.</p>	<p>We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details.</p> <p>Requests for such information should be made in writing to to Data Protection Officer by email dataprotectionoffice@grireland.ie and/or by post to Data Protection Officer, Greyhound Racing Ireland,</p>	<p>This right only applies to your own personal data. When exercising this right, please be as specific as possible.</p>

Your right	What does it mean?	How do I execute this right?	Conditions to exercise?
		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 dataprotectionoffice@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 " <i>basis of processing</i> " above). Objections must be based on grounds relating to your particular 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 " <i>right to be forgotten</i> "), 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 dataprotectionoffice@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 in a position to erase your personal data. This may apply (i) where we have to 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 dataprotectionoffice@grireland.ie and/or by post to Data Protection Officer, Greyhound Racing Ireland,	If you withdraw your consent, this will only take effect for the future.

Your right	What does it mean?	How do I execute this right?	Conditions to exercise?
		Greenpark, Dock Road, Limerick.	

12 COMPLAINTS

- 12.1 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.
- 12.2 You also have a right to complain to the Office of the Data Protection Commissioner at Canal House, Station Road, Portarlinton, Co. Laois by telephone at 1890 25 2231 and/or by email to info@dataprotection.ie.

13 CHANGES TO OUR PRIVACY STATEMENT

- 13.1 We reserve the right to change this Privacy Statement at any time in our sole discretion. If we make changes to this Privacy Statement 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.