

# ÍBR (Reykjavik Sports Union) Privacy Policy

## 1. General

The Reykjavik Sports Association, ID No. 670169-1709, domiciled at Engjavegur 6, 104 Reykjavík (hereinafter referred to as "ÍBR"), is committed to protecting the personal data processed in its operations. This Privacy Policy is intended to explain how we collect and use personal data and the rights of individuals registered with ÍBR.

ÍBR endeavors to comply with the provisions and regulatory framework of the privacy law applicable at each time. This Privacy Policy is pursuant to Act no. 90/2018 on Data Protection and the Processing of Personal Data (the privacy law) and Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR).

ÍBR is the data controller in the sense of the law and is responsible for the processing of personal data in its operations. The Privacy Policy is accessible on the ÍBR website and this version was approved on 2 January 2019.

## 2. ÍBR Privacy Principles

We process all personal data with respect to privacy principles. These principles include that personal data be:

- reliable and updated regularly;
- processed in a lawful, fair and transparent manner;
- obtained for clearly specified and objective reasons;
- processed in a moderate manner in accordance with the purpose of data collection;
- retained in a secure manner and no longer than necessary.

Our aim is for all processing of personal data to be in accordance with the principles in order to ensure the rights of individuals to the extent possible.

## 3. What personal data is collected and how do we collect it?

It is inevitable that the Association's activities include the collection of personal data on various groups of individuals. ÍBR collects and processes personal data on parties including:

- ÍBR applicants and employees
- Representatives of sports clubs
- Customer contacts, volunteers at sporting events, suppliers, contractors, consultants, institutions and other parties with which ÍBR has a contractual relationship
- Recipients of various grants provided via ÍBR
- Participants in ÍBR courses
- Participants in sports events organised by ÍBR
- Representatives of Reykjavik in international tournaments

Different information is collected on different categories of individuals. For instance, more extensive information is gathered on employees than grant recipients and the general public. Information that we process includes:

- Applicant information, including name, personal identity number, address, professional experience and education, skills and other information pertaining to job applications.
- Employee information, including name, personal identity number, photograph, domicile, telephone number, email address, job title and bank account number. We may also process sensitive personal information on employees, including health information and information on trade union membership.
- Information on representatives of member associations, including their name, personal identity number, email address, telephone number and role.
- Information on participants in events organised by ÍBR, including name, personal identity number, gender, nationality, name of the event, competition events, results, T-shirt size, phone number, email address and other information relating to event participation.
- Information on participants in international tournaments, including name, personal identity number, gender, nationality, sport, results, name of tournament, type of tournament, health information, photograph and photocopy of passport.
- Client information, including name, email address, relationship with the company, telephone number, job title and communication history.
- Photographs of guests at the Association's events, seminars and conferences.
- Video recordings from security camera systems. The purpose is mainly to provide security and protect properties in order to protect the interests of ÍBR, visitors and employees.
- Information is collected on the IP address of visitors to ÍBR's websites (ibr.is, reykjaviksport.is, marathon.is and websites for any subsequent events) via cookies that analyse the use of the websites.

The personal data that we collect and process is usually collected directly from data subjects and ÍBR member associations.

#### **4. What is the basis/purpose of personal data processing?**

ÍBR processes personal data on individuals on a consensual basis, particularly as regards participants in sports events organised by ÍBR, and for marketing purposes.

Participants in sports events organised by ÍBR record their personal information in ÍBR's registration system. Information on participants is recorded in order to service them and keep track of the history and statistics of the events.

We also process personal data on the basis of our legitimate interests in using surveillance cameras to provide security and protect properties. In such cases, we make sure that the fundamental rights and freedoms of data subjects do not outweigh our interests in processing the information.

In some instances, we may process personal data of individuals on the basis of a contractual relationship, particularly in the case of job applicants, employees, customers, suppliers and contractors. Processing may also have the purpose of establishing such a contractual relationship.

Processing may also have the purpose of carrying out our legal obligations, including in connection with payment of compensation to employees or to comply with labour laws or equal rights legislation, e.g. our recording of information on gender.

Sensitive personal information is mainly processed for employees and ÍBR representatives in international tournaments. In such cases, we will take appropriate safeguards in accordance with the relevant requirements.

## **5. Dissemination**

ÍBR may share personal data with third parties for various reasons. Such parties include service providers or contractors providing services such as timing, information technology and photography. In such cases, it may be necessary to provide such parties with access to personal data.

When such parties have access to personal data, due to the nature of the service in question, ÍBR will ensure that only the necessary personal data is provided and that the processor in question is a trusted party whose services comply with privacy laws, including as regards the security of personal data.

Individuals should note that any content they choose to publish or share on social media platforms relating to ÍBR is public information, including their name, image, and comments shared on such platforms. By connecting with ÍBR on social media platforms, we assume that permission is given to share information published on the platform with the social media provider. The use of any such information will be according to the privacy policy of the social media platform in question, and we encourage individuals to familiarise themselves with such policies.

## **6. Security**

ÍBR endeavors to protect the security of personal data and has put in place appropriate technical and organisational measures to protect personal data, with regard to the nature and scope of processing. These include the implementation of processes and procedures, as well as technical safeguards which take into account the nature of the information and the risk for the data subjects.

ÍBR will report any security breaches that entail a potential risk for data subjects to the Icelandic Data Protection Authority. In certain cases, ÍBR is also required to notify data subjects of security breaches. ÍBR has implemented procedures to respond to such events.

## **7. Retention**

ÍBR retains personal data for the time necessary to carry out the purpose of data processing. Historical data is stored indefinitely and, as the case may be, transferred to the Reykjavik Municipal Archives. Accounting data is stored for at least 7 years, as required by law.

If the personal data may be required at a later date to fulfil legal obligations or protect legitimate interests, ÍBR will retain such personal data in an appropriately secure manner.

## **8. Rights of individuals**

Individuals may request information on ÍBR's data processing or utilise other rights by sending a query in writing to the email: [ibr@ibr.is](mailto:ibr@ibr.is). The rights of individuals include:

- the right to obtain access to personal data
- the right to obtain a copy of personal data and the right to request that data be corrected or erased
- the right to object to and/or restrict processing

- the right to withdraw consent for processing
- the right to request that personal data be sent to another data controller

Individuals may have further rights relating to ÍBR's processing of personal data. However, the above may be subject to restrictions due to legal requirements or ÍBR's legitimate interests. We will request confirmation of the identity of individuals who utilise their rights, e.g. a driving licence or passports, to prevent information from being passed to unauthorised parties.

## **9. Cookies**

Cookies are text files that are load into a user's browser when they access a website. Cookies enable websites to distinguish between users and analyse their use of the website.

ÍBR uses cookies to count visits to their website. Website traffic is measured and analysed with Google Analytics. The date and time of website visits from each IP address is recorded, as well as the website from which the user accessed the website, browser type, operating system and the keywords used to find the website and content within the website.

Cookies are used to improve user experience on ÍBR's websites. and store important information from the user's previous visits. Information collected by cookies is stored for 30 days before being deleted.

The use of cookies may be restricted in web browsers and cookies deleted. The process is different for each browser but instructions can be found in the browser's help options.

## **10. Communication with ÍBR and the Icelandic Data Protection Authority**

Enquiries regarding ÍBR privacy matters can be sent to [ibr@ibr.is](mailto:ibr@ibr.is) or communicated via telephone, in the number 5353700. In the event of a dispute regarding the processing of personal data, complaints may be sent to the Icelandic Data Protection Authority. Information on how to contact the Authority can be found here: [www.personuvernd.is](http://www.personuvernd.is).

## **11. Changes to ÍBR's Privacy Policy**

The Privacy Policy is reviewed regularly and may be therefore be amended. Amendments to the policy enter into effect upon publication on ÍBR's websites: [ibr.is](http://ibr.is), [reykjaviksport.is](http://reykjaviksport.is), [marathon.is](http://marathon.is) and websites for subsequent events. This version was approved on 2 January 2019.