



DATA PROTECTION POLICY

The purpose of this document is to provide a concise policy statement regarding the Data Protection obligations of Clannlife Fitness. This includes obligations in dealing with personal data, in order to ensure that this organisation complies with the requirements of the relevant Irish Legislation, namely The General Data Protection Regulation (GDPR) 2018.

Clannlife Fitness identifies itself as a Data Controller and a Data Processor and this policy applies to all Personal Data collected, processed and stored by Clannlife Fitness in relation to its staff, Members, guests, and Service Providers.

Scope

This policy covers both personal and sensitive personal data held in relation to data subjects by Clannlife Fitness. This Policy applies equally to personal data held in manual and automated form.

The following key principles are enshrined in the Irish legislation and are fundamental to the policies of Clannlife Fitness

In its capacity as Data Controller, Clannlife Fitness ensures that all data shall:

- 1. Be obtained and processed fairly**
- 2. Be Kept for only one or more specified and legitimate purposes**
- 3. Not to be further processed in a manner incompatible with the specified purpose(s).**
- 4. Be kept safe and secure**
- 5. Be Kept accurate, complete and up to date where possible**
- 6. Be adequate, relevant and not excessive in relation to the purpose (s) for which the data was collected and processed.**
- 7. Not to be kept longer than necessary to satisfy the specific purpose(s)**
- 8. Be managed and stored in such a manner that, in the event a data subject submits a valid subject access request seeking a copy of their personal data, this data can be readily retrieved and provided to them.**

Clannlife Fitness has implemented a Subject Access Request procedure by which to manage such requests in an efficient and timely manner, within the timelines stipulated in the legislation.

Subject Access Request

Where a formal request is submitted by a Data Subject in relation to the data held by Clannlife Fitness, such a request gives rise to access rights in favour of the Data Subject.

There are specific time-lines within which Clannlife Fitness must respond to the Data Subject, depending on the nature and extent of the request. These are outlined in the [Subject Access Request process document](#).

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