

## **Data Retention Policy**

### **Overall Objective / Purpose:**

This is the data and document Retention Policy (“Retention Policy”) of the Ladies Gaelic Football Association (“LGFA”). This Policy applies to LGFA, all staff, employees, officers and contractors engaged by LGFA. The purpose of this Retention Policy is to state LGFA’s policy concerning the retention and destruction of Personal Data (e.g. documents, records, emails and correspondence, files, audio visual files and recordings and any other forms of information and records regardless of their format together referred to as “Data”).

### **Retention principles:**

Having regard to the principles contained in Article 5 of the General Data Protection Regulation 2018 (“GDPR”), it is the policy of LGFA to:

- (a) retain personal data in identifiable form only for such period as is necessary in relation to the purpose for which the data are processed (the “storage limitation” principle);
- (b) ensure that personal data retained by LGFA is adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed (the “data minimisation” principle); and
- (c) take all reasonable measures to ensure that personal data retained by LGFA are accurate (the “accuracy” principle).

### **Application of this Retention Policy:**

This Retention Policy applies to any type of data created, received, transmitted and retained in the context of LGFA’s day to day activities in performance of obligatory functions and any other data processing undertaken by LGFA, regardless of the format.

Therefore, any paper records or electronic files that are part of any of the categories listed in a unit specific Data Inventory must be retained for the period indicated in the Data Inventory. Data should not be retained beyond the period indicated in the Data Inventory, unless a valid operational reason (or a litigation hold or other exceptional situation) calls for its continued retention. If you are unsure whether to retain a certain record, in the first instance please contact the Data Protection Officer (DPO) (email - [dataprotection@lgfa.ie](mailto:dataprotection@lgfa.ie)).

### **Data Ownership:**

All Data, irrespective of format, generated, created, received and/or retained by LGFA in performing the obligatory functions is the property of the Association and subject to its overall control. LGFA Personnel leaving LGFA or changing positions within LGFA are not to remove any Data without the prior written authorisation of their Department.

**How to store Data:**

LGFA's records must be stored in a safe, secure and accessible manner to ensure the security and confidentiality of such data in accordance with LGFA's Data Privacy Policy, which is available at:

Special care is to be taken to ensure that information of a sensitive nature, in particular, information that constitutes a special category of personal data under the GDPR is stored in a secure manner which may include, for example, locked filing cabinets and offices for hard copy data and/or the use of password protection and encrypted files for data stored in electronic form.

**How to Destroy Data:**

Once Data have met their required retention period in accordance with the principles set out in this Retention Policy, such Data should then be transferred to the LGFA approved archives or deleted or destroyed or anonymized as follows: [www.ladiesgaelic.ie](http://www.ladiesgaelic.ie)

- (a) Hard copy files: to be destroyed by confidential shredding or by using the services of an approved confidential waste disposal firm.
- (b) Electronic files: to be purged or deleted or anonymized from all relevant systems on which such Data is stored and/or data bases.
- (c) Data stored in other media: to be deleted or destroyed or anonymized in a safe and confidential manner to ensure the content is not disclosed.