



**FOOTBALL ASSOCIATION OF IRELAND**  
**FOOTBALL MANGEMENT SYSTEM (“FAI CONNECT”)**  
**PRIVACY NOTICE**

## **1. INTRODUCTION AND PURPOSE**

The FAI Football Management System, “FAI Connect”, is provided by the Football Association of Ireland (“FAI”) to enable players, player parents/guardians, clubs, leagues, affiliated associations, and the FAI to input, store and process certain information about you pertaining to your FAI Connect record and the regulatory governance function of the FAI and its affiliates. Authorised users such as club administrators and others including coaches, referees and match officials can access FAI Connect via the Comet Football app. Depending on the functionalities used, parts of the personal data entered will be displayed on the publicly available FAI Connect app which displays fixtures, results, detailed match reports, standings and stats from official football competitions in Ireland.

It is a mandatory requirement under the FIFA Regulations for the FAI to implement and use an online electronic information system with the ability to record the registration and transfer of all players under the jurisdiction of the FAI. The FAI has therefore implemented and is the controller for information it processes on FAI Connect.

For the purpose of this document, any reference to ‘we’, ‘our’ or ‘us’ shall be deemed to be a reference to the FAI. References to ‘you’ or ‘your’ are references to you in your personal capacity as an individual or in your capacity as a representative where your own personal data has been shared or that of the person you are representing.

Please note that this Privacy Notice outlines the FAI’s collection and use of personal data on FAI Connect (which includes both the administrative Comet Football app and publicly available FAI Connect app). For more information on the FAI’s data processing activities beyond FAI Connect, it is important that you read this privacy notice together with the FAI Privacy Notice and any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you.

You can contact us directly by emailing [datamanager@fai.ie](mailto:datamanager@fai.ie). You can also write to us at: Football Association of Ireland, National Sports Campus, Abbotstown, Dublin 15, D15 X8PD.

The Data Protection Officer for the FAI can be contacted by emailing [datamanager@fai.ie](mailto:datamanager@fai.ie) "FAO: DPO".

If you are an administrator and are adding or amending data on behalf of an individual in FAI Connect, you must make sure that they are aware of this FAI Connect Privacy Notice.

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us; any such changes can be reported to us via [datamanager@fai.ie](mailto:datamanager@fai.ie)

**This version was last updated on 11 December 2023**

## 2. THE DATA WE COLLECT ABOUT YOU

### Personal Data

Personal data or personal information, means any information about an individual from which that person can be identified.

We collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your first name, last name, photograph, title, marital status, date of birth, gender, country of birth, club membership or affiliation, identification documents, immigration documents and FIFA unique player ID number.
- **Contact Data** includes home address, billing address, delivery address, email address, telephone number(s) and next of kin contact details.
- **Medical Data** includes information about your health which you may choose to include on FAI Connect such as allergies, asthma or other medical or health related issues that may impact your participation in football.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data:** records of transactions relating to FAI Connect such as details about payments to and from you and other details of products and services you have purchased from us and courses or programmes booked and attended.
- **Device Data** includes the type of mobile device you use, a unique identifier for example, your devices IMEI number, the MAC address of the devices wireless network interface, the type of browser you use, type of the mobile phone.
- **Technical Data:** technical data relating to your use of FAI Connect which includes internet protocol (IP) address, your login data, browser type and version, time zone

setting and location, browser plug-in types and versions, operating system and platform.

- **Profile Data** includes username and password, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences and consents in receiving marketing or communications from us.
- **Engagement Data** includes records and information on participation, ranking, ratings, playing details, history, competition results, attendance and performance, performance data, courses attended, accreditations, qualifications and licenses, experience in current and previous employment, disciplinary and grievance information, information inputted on to the FAI's game management system and other information obtained via electronic and digital means, including footage of football matches in which you have participated.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED

We use different methods to collect data from and about you including through:

**Direct interaction:** You provide your Identity Data, Contact Data, Profile Data and Financial Data by registering or filling in forms (in writing or electronically) on FAI Connect. This includes but is not limited to personal data you provide when you:

- complete the player registration form and the information on the form is uploaded to FAI Connect by a club official. To register as a player, the following information must be provided: name, gender, nationality, date of birth, country of birth, address, email, photo, ID document, and club information. If this information is not provided, the FAI will not be able to register you as a player identified with a FIFA ID and therefore you will not be eligible to participate in organised football.
- apply to enrol for a course, training programme or event on FAI Connect;
- create an account or profile on FAI Connect;
- register as a coach, staff member, referee/match official, Club/League/Affiliate Association official, or Football Agent on FAI Connect. Registration as a coach, staff member, referee/match official, Club/League/Affiliate Association official, or Football Agent on FAI Connect requires the following information is provided: name, gender, nationality, date of birth, country of birth, address, email, photo, and ID document. Depending on your role, other information may be required such as your coaching license or vetting clearance required by law. Failure to provide the required information may prevent registration.
- give us feedback.

**Automatically collected:** As you interact with FAI Connect, we automatically collect Technical Data, Device Data and Usage Data about your equipment, browsing actions and engagement

with the platform. We collect Usage Data by using cookies, and other similar technologies. Please see our Cookie Policy for further details.

**Third party sources:** Depending on the circumstances, we may receive personal data about you from third parties such as:

- Your FAI affiliated club or team;
- FAI Affiliated Members including regional associations, organisations and leagues;
- Match or league officials, for example referees providing match day information;
- FIFA, Sport Ireland or any other sports governing body;
- Other stakeholders including law enforcement or statutory bodies such as TUSLA.

#### 4. WHY AND HOW WE USE YOUR PERSONAL DATA

We have set out below descriptions of the purposes for which we process your personal information together with the legal basis we rely upon to do so.

##### Contractual Necessity

We process information as necessary to conclude and perform our contract with authorised users of FAI Connect such as club administrators and others including coaches, referees and match officials.

Why and how we process your personal data	Categories of personal data used
<p><b>To enable you to create a profile on FAI Connect, we:</b></p> <ul style="list-style-type: none"> <li>• collect and verify your email to register you as an authorised user of FAI Connect.</li> <li>• record your acceptance of the <a href="#">FAI Connect Terms and Conditions of Use</a>.</li> <li>• facilitate your instalment and login to the Comet Football app.</li> </ul>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Device Data</li> <li>• Technical Data</li> <li>• Profile Data</li> <li>• Usage Data</li> </ul>
<p><b>For FAI Connect profile management and football administration:</b></p> <p><b>For all FAI Connect authorised users, we:</b></p> <ul style="list-style-type: none"> <li>• Collect and display your registration information including your photograph on your FAI Connect profile.</li> </ul>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Transaction Data</li> <li>• Device Data</li> <li>• Technical Data</li> </ul>

- Process payments, or the payment of fees, fines and charges owed, including by your club or association, and maintain payment records on FAI Connect.
- Administer your attendance at any courses or programmes you sign up to via FAI Connect and update your profile with the courses you have completed.
- Record your marketing and communication preferences.

**For volunteers, coaches, staff and referees we:**

- Maintain records of any courses you have undertaken.
- Record the coaching licenses of all coaches involved in the FAI.
- Enable access to your own club's information and player information stored on Comet Football for football administration purposes.

**For referees and other match officials, we:**

- Verify your identity and eligibility for appointment.
- Maintain a record of your availability to officiate matches.
- Enable you to confirm a team sheet and add a match report after a game on FAI Connect.

**For club and league administrators, we:**

- Enable you to manage your club's profile, venue, teams, registrations, kits and officials.
- Facilitate setup and recurring administration of competitions of all levels, from schoolboys and girls tournaments to major FAI affiliated cups.

- Profile Data
- Usage Data
- Marketing and Communications Data
- Engagement Data.

## Consent

We process information for the purposes described below when you give us your consent.

Why and how we process your personal data	Categories of personal data used
<b>Where a player is under 18, we seek the consent of player's guardian/parent to display their photograph on the public app FAI Connect.</b> For example, where consent is given by the player's guardian/parent their photo will be displayed as part of a team line up.	<ul style="list-style-type: none"><li>• Identity Data (of players under 18)</li></ul>
<b>Display Health Information you have chosen to include as part of your registration information.</b> Where Health Information such as allergies, asthma, etc., is included as part of registration information it will be included on your profile on the administrative Comet Football app for informational and safety purposes only. Note your Health Information will not be displayed on the public app FAI Connect.	<ul style="list-style-type: none"><li>• Health Data</li></ul>
<b>To send you direct marketing</b> where you have given your consent.	<ul style="list-style-type: none"><li>• Contact Data</li><li>• Marketing and Communications Data</li></ul>

## Legal Obligation

We process your personal data where we are required by law to do so.

Why and how we process your personal data	Categories of personal data used
<b>Garda Vetting applications:</b> It is a statutory requirement under the National Vetting Act (Children and Vulnerable Persons) 2012 to 2016, that all individuals, volunteers or paid, working with Children and Vulnerable Persons have completed Garda vetting clearance.  We process application made via the Course Management section of your MyComet account. For more information see: <a href="https://www.fai.ie/domestic/safeguarding/garda-vetting">https://www.fai.ie/domestic/safeguarding/garda-vetting</a>	<ul style="list-style-type: none"><li>• Identity Data</li><li>• Contact Data</li><li>• Engagement Data</li></ul>

<p><b>To comply with our child welfare and safeguarding obligations.</b> The Children First Act 2015 imposes a number of obligations on the FAI and depending on the circumstances, we may need to process your personal data to comply with those obligations.</p> <p>For more information see: FAI Child Welfare &amp; Safeguarding Policy, <a href="https://www.fai.ie/domestic/safeguarding/fai-child-welfare-policy">https://www.fai.ie/domestic/safeguarding/fai-child-welfare-policy</a></p>	<p>The personal data used depends on the circumstances but could include any of the Personal Data We Collect About You.</p>
<p><b>To report on the compliance of the FAI:</b> As part of the obligations we are required to adhere to in order to receive grants or public funding, we share aggregated data, such as about the number of participants, with Sport Ireland.</p>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Engagement Data</li> </ul>
<p><b>To access, preserve or disclose certain personal data if there is a valid legal request from a regulator, law enforcement or other formal authority.</b> Where appropriate, we process your data in connection with legal matters which includes engagement with regulatory investigatory bodies in circumstances where the FAI is legally required to engage with and disclose data as part of that process, for example an audit by a public authority exercising its powers of disclosure.</p>	<p>The personal data used depends on the circumstances but could include any of the Personal Data We Collect About You.</p>
<p><b>To implement appropriate information security measures:</b> Article 32 GDPR requires us to implement appropriate technical and organisational security measures when we process personal data.</p>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Device Data</li> <li>• Technical Data</li> <li>• Profile Data</li> <li>• Usage Data</li> </ul>

## Legitimate Interests

We rely on our legitimate interests or the legitimate interests of a third-party where they are not overridden by your interests or fundamental rights and freedoms.

Why and how we process your personal data	Legitimate interests relied on	Categories of personal data used
<p><b>To maintain an electronic player registration system, we:</b></p> <ul style="list-style-type: none"><li>• Collect and store player registration information on FAI Connect.</li><li>• Verify a player's age, identity and eligibility to play. For example, we collect a copy of your passport or government issued ID to verify the registration information and take steps to ensure your player profile on FAI Connect is accurate.</li><li>• Share information with FIFA to assign each player a FIFA ID and if necessary, for the creation of a player passport.</li><li>• Maintain a record of each player's registration, affiliation, training history, disciplinary records and performance history. For example, your match history and playing statistics may be recorded and displayed on FAI Connect and on the</li></ul>	<p>It is in the interests of the FAI and FIFA in maintaining an online electronic information system which facilitates the organisation and governance of the game of football and in the interests of the broader footballing community in having such a system in place.</p>	<ul style="list-style-type: none"><li>• Identity Data</li><li>• Contact Data</li><li>• Transaction Data</li><li>• Profile Data</li><li>• Marketing and Communications Data</li><li>• Engagement Data</li></ul>



<p>FAI's website.</p> <ul style="list-style-type: none"> <li>• Information relating to your disciplinary record and any misconduct charge will be provided by a referee or disciplinary authority directly into FAI Connect.</li> <li>• Display your photograph on your player profile on FAI Connect which is viewable by the authorised users in your club or association and the FAI.</li> <li>• Maintain a record of the marketing preferences expressed on your registration form.</li> <li>• For professional player registration, information about contacts, loans and transfers may also be uploaded to FAI Connect.</li> </ul>		
<p><b>To uphold the integrity of the sport and ensure the safety of players, we:</b></p> <ul style="list-style-type: none"> <li>• Verify a player's date of birth to ensure all players are competing in the correct age group.</li> <li>• Take steps to enable the verification of a player's identity such as obtaining a signature or facilitating match day</li> </ul>	<p>It is in our interest to ensure the FAI's Regulations are adhered to, including by verifying players identity or age, taking steps to ensure the rules and regulations are followed. It is in the interests of all participants that the game of football in Ireland is properly administered, and the safety of participants is protected.</p>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Engagement Data</li> </ul>

<p>information sharing, namely sharing team sheets and player information with the designated referees, match and league officials and opposition teams.</p> <ul style="list-style-type: none"> <li>• Investigate complaints, concerns, allegations or referrals with regards to child or adult at risk.</li> <li>• Investigate and/or initiate disciplinary proceedings for an alleged breach of the FAI's Regulations. This includes collecting information for the administration of the disciplinary process and sharing it as necessary, for example, with the Disciplinary Committee or Appeals Committee or other third parties described in the <i>"Sharing of your Personal Data"</i> section below.</li> </ul> <p><b>Where the competition management function on FAI Connect is being used:</b></p> <ul style="list-style-type: none"> <li>• Share the match card/team sheets with the match officials (i.e referee) once both teams have confirmed their teams.</li> </ul>		
<p><b>To promote and develop the game of football, we:</b></p>	<p>It is in our interests and the interests of other governing bodies such as FIFA and Sport</p>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> </ul>

<ul style="list-style-type: none"> <li>• Create metrics and aggregating data to gain insights such as to understand the playing pathways of players in Ireland or understanding the geographical differences within the structure of underage football in Ireland. For example, to identify where drop off rates are most prevalent.</li> <li>• Share aggregated information with sporting associations such as Sport Ireland as part of industry / sectoral analysis.</li> </ul> <p><b>Where the competition management function on FAI Connect is being used:</b></p> <ul style="list-style-type: none"> <li>• Display playing and match history and statistics on FAI Connect and the FAI's website.</li> </ul>	<p>Ireland in measuring and gaining valuable insights in order to inform decisions to develop and enhance the game of football in Ireland. It is also in our interests to promote the game of football in Ireland.</p>	<ul style="list-style-type: none"> <li>• Profile Data</li> <li>• Usage Data</li> <li>• Engagement Data</li> </ul>
<p><b>To communicate with you, we:</b></p> <ul style="list-style-type: none"> <li>• Use your Contact Data to respond to any enquiry you make and contact you about game related matters and circulate any regulatory or safety updates, including changes to laws of the game.</li> <li>• Notify you about changes to the FAI</li> </ul>	<p>It is in our interests to respond when you contact us and to send notifications. It is in the interests of all individuals to receive these notifications. It is in our interest and in the interest of all individuals involved in the game of football in Ireland to share their views with the FAI.</p>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Profile Data</li> <li>• Marketing and Communications Data</li> </ul>

<p>rules and regulations, our privacy policies or terms.</p> <ul style="list-style-type: none"> <li>• Ask you to provide feedback or to take a survey.</li> </ul>		
<p><b>We preserve and share information in response to legal requests or when we seek professional advice or seek to protect ourselves in the context of litigation and other disputes.</b></p> <ul style="list-style-type: none"> <li>• Depending on the circumstances, we share information with statutory authorities or agencies.</li> <li>• Where necessary and depending on the circumstances, we share your information with our professional advisers including lawyers, bankers, auditors and insurers who provide professional services.</li> </ul>	<p>It is in our interest to seek professional advice and protect ourselves including our rights, personnel and property, including as part of investigations or regulatory inquiries and litigation or other disputes.</p> <p>It is in our interest and in the interest of all individuals involved in the game of football in Ireland to prevent and address harmful or illegal activity.</p>	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Transaction Data</li> <li>• Device Data</li> <li>• Technical Data</li> <li>• Profile Data</li> <li>• Usage Data</li> <li>• Marketing and Communications Data</li> <li>• Engagement Data</li> </ul>
<p><b>To provide, operate and maintain FAI Connect, we:</b></p> <ul style="list-style-type: none"> <li>• Collect and aggregate Usage Data to calculate the percentage of users accessing a specific FAI Connect feature.</li> <li>• Use your information to perform platform and website maintenance and administration.</li> <li>• Perform limited</li> </ul>	<p>It is in our interest and the interests of all participants that we provide and maintain FAI Connect. It is also in the FAI's interests to gain insights in order to develop, maintain and forecast technical needs.</p>	<ul style="list-style-type: none"> <li>• Device Data</li> <li>• Technical Data</li> <li>• Profile Data</li> <li>• Usage Data</li> </ul>

<p>analytics to maintain and develop our technical infrastructure and the products and services delivered via or in connection with FAI Connect.</p>		
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## 5. SHARING OF YOUR PERSONAL DATA

We share your personal data with the parties set out below.

### Service providers.

Analyticom is the third-party service provider that hosts FAI Connect. Analyticom will only process your personal data on our instructions and is not entitled to use your data for their own purposes. All FAI Connect data will be stored in Analyticom's data centre in Germany.

### Third Parties

- To administer football matches, competitions and leagues your Identity Data will be shared with clubs, associations and leagues.
- FIFA, Sport Ireland and other governing bodies for football who may reasonably require your personal data for the administration of football. For example, a player's Identity Data is shared with FIFA to assign a unique FIFA player ID number.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, payroll, banking, legal, insurance and accounting services.
- Individual or bodies appointed by the FAI including, but not limited to, LOI Department, Competitions Department, Referee Committees, Disciplinary Committees and Appeal Committee members (or independent arbitration services) or independent Club Licensing committee.
- Statutory authority or agency such as law enforcement.

## 6. INTERNATIONAL TRANSFERS

We transfer the personal information we collect and store in FAI Connect outside the EU.

When we transfer your personal information to FIFA in Switzerland for football administration purposes such as to assign you a unique player ID or to obtain an International Transfer Certificate, we rely on we rely on standard contractual clauses approved by the European Commission.

To obtain a copy of the standard contractual clauses, please contact [datamanager@fai.ie](mailto:datamanager@fai.ie)

## 7. DATA RETENTION

We will retain your personal data for as long as necessary to fulfil the purposes described above or to satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the purposes for which we process your personal data and the applicable legal requirements.

For authorised users of FAI Connect, we retain the personal information associated with your FAI Connect profile until you request that it is deleted. Information you provide about your club, association, match results etc., will be retained for longer.

For players:

- we maintain an active electronic registration on FAI Connect for as long as you are registered by your club and the Player Registration Levy is paid. Where a player is not actively participating and the Player Registration Levy is unpaid, an inactive registration of limited personal data (name, date of birth, FIFA player ID and club history) is maintained on FAI Connect to enable players to return to playing at a later date. You can request that the FAI delete your inactive registration on FAI Connect at any time.
- when your photo ID (like your passport or government issued ID) is uploaded on to FAI Connect, it is deleted once your registration information has been verified by the FAI Connect team. Once it is deleted, we only retain a record that your identity has been verified.

Information stored for disciplinary purposes (which includes records of yellow/red cards, suspensions, code violations etc.,) will be retained for at least 50 years in order to administer the FAI's regulatory function and maintain an accurate record of the game.

## **8. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

**You may**

- **Request access to your personal data.**  
This is commonly known as a "data subject access request". This enables you to receive information on how your data is processed and a copy of the personal data we hold about you.
- **Request correction of your personal data.**  
This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure of your personal data.**  
This enables you to ask us to delete personal data, subject to certain exemptions under Article 17 of the GDPR. In this regard, we may not always be able to comply with your

request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing of your personal data.**

You may object where we are relying on legitimate interests to process your personal data on grounds relating to your particular situation. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your interests, rights and freedoms.

You always have the right to object where we are processing your personal data for direct marketing purposes.

- **Request restriction of processing your personal data.**

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request transfer of your personal data to a third party.**

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

- **Right to withdraw consent.**

Where we are relying on consent to process your personal data, you have the right to withdraw your consent to this processing at any time. However, this will not affect the lawfulness of any processing carried out before you withdrew your consent.

- **Right to lodge a complaint.**

You have the right to make a complaint to the Data Protection Commission ([www.dataprotection.ie](http://www.dataprotection.ie)) which is our supervisory authority under the GDPR.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

To exercise any of the rights set out above, please contact [datamanager@fai.ie](mailto:datamanager@fai.ie) with your specific query or request.