

# Burton Albion Football Club

## Privacy Notice

### 1. Introduction

We believe you should always know what data we collect from you and how we use it and that you should retain control over both.

We are the data controller responsible for the processing of any personal data you give us. This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe. It's likely that we'll need to update this Privacy Notice from time to time and we will notify you of any significant changes.

### 2. What sort of personal data do we collect

Personal data means any information about an individual from which that individual can be identified.

You provide information about yourself when you register with the Club and by filling in forms at an event or online, or by corresponding with us by phone, email or otherwise.

The information you give us may include:

- Identity Data: such as your name, username, club supporter ID, date of birth etc
- Contact Data: such as your address, billing address (where different), email address, phone number (s) often required as part of the purchasing process or function booking
- Financial data: such as World Pay/bank account/payment card information
- Transaction Data: such as details about products or services you have purchased previously with us
- Technical Data: such as your internet protocol (IP) address, your login data and other data about the systems used when accessing our site. Some sites will use cookies.
- Your image and that of your vehicle, potentially on CCTV as part of site security & safety

If you do not provide this data, often we may be unable to proceed with the transaction.

### 3. Our Legal bases for collecting and processing data

*Contractual obligations* – in certain circumstances we need your personal data to comply with our contractual obligations e.g. where we sell you tickets for a game/membership or merchandise or agree details for an event and you enter a contract of sale with the club for product or services and we take your personal details as part of that transaction

*Legal compliance* – if the law requires us to we may need to collect and process your data e.g. we may pass on details of people including CCTV footage involved in fraud or other criminal activity affecting the club to law enforcement authorities.

#### *Legitimate interest*

In specific situations we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests e.g. we will use your purchase history/your address details to send you or make available personalised offers by post telling you about products, services & social events that we think might interest you or that membership provides when you register with the club

*Consent* – in specific situations we can collect and process your data with your consent (opt in basis) e.g. when you tick a box to receive email newsletters information about promotions and offers from sponsors. For minors, the written consent of a parent/guardian would be needed

#### **4. When do we collect your personal data?**

When you visit our website and create an account to buy tickets on line

When you make an online purchase

When you purchase a ticket in store or by phone but don't have an account

When you engage with us on social media

When you contact us by any means with queries, complaints etc.

When you agree that our partners can email you about a product or service

When you enter prize draws or competitions

When you book an event such as corporate hospitality or function such as a wedding

When you complete any surveys or forms or comment online through social media

When you've given a third-party permission to share with us the information they hold about you e.g. marketing agencies, ticket agencies, website providers (e.g. EFL digital) or other clubs. NB please see EFL Privacy Notice that will also apply

When you use our car parks, shop and stadium which usually have CCTV systems operated for the security of both customers and staff. These systems may record your image during your visit.

#### **5. How and why do we use your personal data**

We want to give you the best customer experience and one way we do this is to get a better picture of who you are by combining the data we have about you. We then use this to offer you promotions, products and services that are most likely to interest you. The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

If you wish to change how we use your data, you'll find details in "What are my rights?" section below. NB if you choose not to share your personal data with us or refuse certain contact permissions we might not be able to provide some services you've asked for. For example, letting you know when an item from the shop arrives or registering your membership.

Here's how we'll use your personal data and why:

- To process any orders that you make by using our websites or in store/by phone. If we don't collect your personal data during checkout we won't be able to process your order and comply with our legal obligations. For example, your details may need to be passed to a third party to process the ticket order and we may keep your details for a reasonable period afterwards to fulfil any contractual obligations for refunds etc as well as ensuring improved customer service by speeding up the ordering process using saved data previously provided
- To respond to your queries, requests and any complaints you may have. Handling the information you sent enables us to respond and keeping this record enables us to keep you informed at all stages. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and continually seeking to improve this service for you.
- To protect our business and your account from fraud and illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll do this as part of our legitimate interest.

- To protect our customers, employees, premises and assets from crime we operate CCTV systems in certain parts of the stadium which record images for security and safety reasons. We do this on the basis of legitimate business interests.
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim to protect the individuals we interact with from criminal activities.
- To send you relevant, personalised communications in relation to updates, offers, services and products from the Club. We'll do this on the basis of our legitimate business interest
- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web, text, telephone about special offers and services supplied from third parties as well as promotions, events, competitions from the Club. NB you are free to opt out of hearing from us by any of these channels at any time.
- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you, for example changes to the Privacy Notice or terms and conditions that If we did not use your personal data we would be unable to comply with our legal obligations. These service messages will not include any promotional content and do not require prior consent when sent by email or text message.
- To comply with our contractual or legal obligations to share data via a court order or similar with law enforcement agencies
- Surveys and feedback requests as part of our legitimate interests to improve our services
- To process your booking. Sometimes we'll need to share your details with a third party who is providing the service. Without sharing your personal data we'd be unable to fulfil your request.

## 6. How we protect your personal data

We will treat your data with the utmost care and take the appropriate steps to protect it.

We secure access to all transactional areas of our websites and other systems using 'https' and SSL encryption technology and adhere to Payment Card Industry standards for processing card transactions. In addition, we limit access to your personal data to those employees, and other third parties who have a business need to know.

We monitor our systems for possible vulnerabilities and where any suspected personal data breach occurs we will notify you and any applicable regulator where we are legally required to do so.

In turn we would advise that you have responsibility to keep passwords safe and ensuring that you use a secure browser.

## 7. How long will we keep your personal data

Whenever we collect or process your personal data we'll only keep it for as long as it is necessary for the purpose for which it was collected, including for the purposes of satisfying any legal, accounting or reporting requirements. At the end of that retention period, your data will either be deleted or anonymised (so that it can no longer be associated with you) if it is being used for statistical processes for example.

For legal reasons we may have to keep basic information about our customers (including Identity, Contact, Financial & Transactional data) for up to seven years after they cease being customers, particularly for any paid products or services

#### **8. Who do we share your personal data with**

We sometimes share your personal data with trusted third parties. For example: IT companies who support our business systems, Direct Marketing companies who help us manage our electronic communications with you

In such circumstances:

- We provide only the information they need to perform their specific services
- They may only use your data for the exact purposes we specify in our contract with them
- We work closely with them to ensure that your privacy is respected and protected
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous

#### **Sharing your data with third parties for their own purposes**

We will only do this in very specific circumstances for example

- With your consent given at the time you supply your personal data we may pass data to a third party for their direct marketing purposes, such as EFL.
- For fraud management we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data with law enforcement bodies.
- We may be required to disclose your personal data to the police or other enforcement regulatory or Government body upon a valid request to do so.

#### **9. Where your personal data may be processed**

We may transfer personal data that we collect from you to third party data processors in countries that may be outside the European Economic Area (EEA) such as the USA.

For example, this might be required in order to process your payment details.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA e.g. our contracts with third parties stipulate the standards they must follow at all times.

#### **10. What are your rights over your personal data**

*You have the right to request:*

- Access to the personal data we hold about you (known as a “data subject access request”)
- The correction of your personal data when incorrect, out of date or incomplete.
- In certain circumstances, erasure or removal of personal identifiers where there is no good reason for us continuing to process it, or where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law
- When you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end (e.g. end of warranty)
- That we stop any consent- based processing of your personal data eg for direct marketing purposes after you withdraw that consent

If we choose not to action your request we will explain to you the reasons for our refusal

### *Your right to withdraw consent*

Whenever you have given us your consent and use your personal data you have the right to change your mind at any time and withdraw that consent.

### *Where we rely on our legitimate interest*

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

### *Direct marketing*

You have the right to stop the use of your personal data for direct marketing activity through all channels or selected channels. We must always comply with your request.

To make a request, in the first instance, you should contact the Data Protection Officer at Burton Albion, Pirelli Stadium, Princess Way, Burton on Trent DE13 OAR

You will not usually have to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee (or refuse to comply) if your request is clearly unfounded, repetitive or excessive .

### *Checking your identity*

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

## **11. How can you stop the use of your personal data for direct marketing?**

- By responding No or failing to respond to any Opt-In email communication
- Changing your preferences settings on any systems you can log in to with the club.
- Writing to Data Protection Officer at Burton Albion, Pirelli Stadium, Princess Way, Burton on Trent DE13 OBH

NB you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

## **12. Contacting the Regulator**

If you feel that your data has not been handled correctly or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioners Office ([www.ico.org.uk/concerns](http://www.ico.org.uk/concerns))

If you are based outside the UK you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

## **13. Any other questions**

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it. If you have any questions that haven't been covered please get in contact.