

STEVENAGE FOOTBALL CLUB

# PRIVACY POLICY

2018/19



**#WEARESTEVENAGE**

# Privacy Policy

EXTERNAL



<b>Date of Last Review</b>	5 <sup>th</sup> November 2018
<b>Review Undertaken By</b>	A.Tunbridge - CEO
<b>Policy Overview</b>	
This Policy outlines how the Club will process and manage data it collates from individuals in an online environment.	
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<ul style="list-style-type: none"><li>• None</li></ul>	

## **1-Who We Are**

Stevenage Football Club Limited may use your data on the basis set out in the Policy.

References to 'we', 'us' and 'our' in this Policy are all references to Stevenage Football Club Limited.

## **2-What This Policy Covers**

This Policy applies to personal data collected by us through both online and offline channels.

Where personal data is collected and used for the purposes set out in this Policy, Stevenage Football Club are the 'data controllers' under data protection law applicable in the EU ('Data Protection Law').

You should read this Policy together with any other privacy information which may be provided on specific occasions when personal data about you is collected. That will ensure you are fully aware of how and why we are using your data. This Policy supplements any other notices and is not intended to override them.

## **3-What This Policy Does Not Cover**

This Policy does not apply in relation to any data you provide to us through non-official submissions such as telephone enquiries or in person.

### **Links to Third Party Websites and Services**

We are not responsible or liable for the content, privacy notices or services offered by websites or apps other than the Online Facilities. We encourage you to read those notices.

This includes websites and apps which link from any of the Online Facilities, with the exception of: (i) the Club's official ticketing and merchandise service, which only the Club controls.

## **4-Helpful Definitions**

Personal Data is information, such as your name, birth date, e-mail address or mailing address, that can be used to uniquely identify you.

Anonymous information is not personally identifiable information. Anonymous information is information about how you use our site. Anonymous information also includes the domain names and/or I.P. addresses (as explained below) of internet browsers that visit our site, the time of day that the site was visited, and other non-personal information.

Anonymous information is information that is not tied to any person, but helps us know what our supporters do. (for example, we know that the average stay on [www.stevenagefc.com](http://www.stevenagefc.com) lasts over 3 minutes).

## 5-What Information We Collect?

We may collect, use, store and transfer different kinds of personal data about you. For the purpose of this Policy we have grouped these together as follows:

**Identity Data** such as your name(s), username or similar identifier, marital status, Club supporter or similar number, title, date of birth, gender and job title (where relevant).

**Contact Data** such as your address, billing address (where different), email address, preferred language and telephone numbers.

**Financial Data** such as your bank account, PayPal account and/or payment card details.

**Transaction Data** such as details about payments to and from you and other details of products or services you have purchased from us or accessed.

**Technical Data** such as your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types versions and statuses, operating system and platform and other technology on the devices you use to access the Online Facilities.

The Online Facilities use cookies, which are small files with a code that is stored on your device, with your consent, and is retrieved when you next visit the Online Facilities. This allows information about your use and browsing to be recognised. Full information on which cookies we use is available in our Cookies Policy, along with guidance about how you can set your browser to refuse all or some cookies (but that may affect some use of the Online Facilities).

**Profile Data** such as your usernames and passwords, associated social media accounts, supported team or Club, your interests, preferences, posts or comments on interactive features (if any), feedback and/or survey responses.

**Usage Data** such as information about how you use the Online Facilities and services provided through them (including newsletters and marketing emails, and advertisements). This may include information about page views, length of visit or use and exit route, timing, frequency and patterns of your use, along with navigation paths when using the Online Facilities – this information does not directly identify you. We use various tools to help us with this, including Google Analytics (see our Cookies Policy for further information). Where you have subscribed to receive the Club newsletter or marketing emails we will also receive information about whether you open, delete, or access links contained in the newsletter, the browser or app type used and whether opened via mobile or desktop.

**Communications Data** includes information you provide when communicating with us, your preferences in receiving marketing from us and our third parties and (where relevant) any other communication preferences.

**Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be generated from your personal data but does not directly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

**Special Categories of Personal Data** includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We generally do not collect this information, and where we do it is held in an anonymised form detached from your other data so

does not reveal your identity. We do not collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Use of services accessed through the Online Facilities may require you to provide specific types of information. Where you fail to provide that information, we may not be able to perform the contract we have or are trying to enter into with you.

### **Children's Data**

We understand that children and young people, including those under 13 years of age ("minors"), may visit the Online Facilities or otherwise interact with us. Minors may need their parent or guardian's permission to use or access certain facilities or receive certain information through the Online Facilities. Minors may also be asked to confirm they have that permission, and we reserve the right to verify parental or guardian consent, where required.

We try not to make a minor's participation in activities with us contingent on the minor disclosing any more personal information than is reasonably necessary in order to do so. We do not actively market to minors or use (or pass to any third party) personal information on persons known to be minors for any commercial purposes, without proper consent.

Other age restrictions may apply to certain products, services or opportunities available through our Online Facilities.

## **6-How We Collect Your Personal Data**

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

**Direct interactions.** You may give us your Identity, Contact, Financial, Communication and certain Profile Data by filling in forms or by corresponding with us using contact details we provide on the Online Facilities. This includes, amongst other things, personal data you provide when you: request a newsletter subscription); participate in interactive features, including any competition, promotion or survey; or give us feedback.

**Automated technologies or interactions.** As you interact with the Online Facilities, Technical & Usage Data about your equipment, browsing actions and patterns may also be collected or generated, along with Profile and Communications Data. We collect this personal data by using cookies, server logs and other similar technologies. We do not receive data from other websites you visit. Please see our cookie policy for further details. Other websites may use cookies which activate beyond their websites, including when you use the Online Facilities (you should check the cookies policy of those websites in those instances).

**Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:

- Technical & Usage Data from parties such as our analytics providers (including Google), and advertising networks (see below);

- Identity, Contact, Profile, Financial, Transaction, Usage and Technical Data from providers of technical, payment and delivery services;
- Identity, Contact, Profile, Usage and/or Technical Data from social media platforms which are publicly available or through which you may log in or interact with the Online Facilities;
- Identity, Financial and/or Contact Data from data brokers or aggregators, such as those used for any credit reference or similar pre-service vetting facility (if any); and
- Information from lawfully available sources where relevant to our bringing, defending or assisting in legal action (such as the police, regulators, investigators or publicly available sources).

We may also supplement the information collected with other information that we obtain from our dealings with you or which we receive from other organisations, such as our commercial partners, and group companies.

## 7-What We Use Your Personal Data For

We use information about you for the following purposes:

**Services, Products & Opportunities-** to allow you to register an account or otherwise receive products, services and other opportunities (such as a subscription or newsletter) and fulfil any of our obligations for delivery of those. Automated processes may assess your eligibility to receive services such as subscriptions, based on the information you provide - if you think that process has incorrectly refused you a subscription, let us know why and we will have a human review it.

Processing your data for this purpose will usually be necessary (i) to perform any contract with you for the relevant service where applicable (ii) to comply with legal obligations where applicable or (iii) otherwise for our legitimate interests in complying with third party requirements which enable us to provide the service(s).

**Payments and Finance-** to collect payments from you for any paid for products or services, and/or administer any payments which may become due to you. This will usually be necessary (i) to perform any contract with you for the paid for service or (ii) to comply with legal obligations where applicable or (iii) for our legitimate interests in recovering debts due to us.

**Participation and Interactive Features** - to enable you to participate in chat rooms, forums, message boards, and/or news groups on or associated with the Online Facilities on which you can post information (if any) and, where we deem necessary, to respond to any such posts you make. Information you post in these areas may become public information and must always comply with our [Terms of Use](#) (in relation to the official Club website) and EULA (in relation to the official Club app). The processing of your personal data here will usually be necessary (i) to perform any contract with you for the relevant service or (ii) for our legitimate interests in running and improving our services and managing our relationship with you as a customer.

**Publications-** to include you in relevant publications, such as where you win a promotion we or one of our commercial partners carry out. We will usually ask you for permission in these circumstances.

**Manage and Improve-** to manage and improve the Online Facilities, notify you of applicable changes where required and allow you to use the features offered by the Online Facilities. This will usually be necessary (i) to perform any contract with you where relevant for applicable services (ii)

to comply with legal obligations where applicable or (iii) otherwise for our legitimate interests in managing our relationship with you as a customer, improving our service, and/or record keeping.

**Communications-** to communicate with you where necessary for purposes other than marketing. This will usually be necessary (i) to perform any contract with you for applicable services where relevant (ii) to comply with legal obligations where applicable or (iii) otherwise for our legitimate interests in managing our relationship with you as a customer, improving our service, and/or record keeping.

**Administer and Protect-** to administer and protect our businesses, the Online Facilities, and rights of ourselves or other associated third parties (including those of other users and partners). This may include routine tasks such as troubleshooting, data analysis, testing, system maintenance and support as well as more formal matters such as bringing, defending or assisting in legal action where necessary. This will usually be necessary (i) for our legitimate interests in running our business and systems in a secure manner, business restructuring, protecting our rights and property (including intellectual property) and preventing or tackling illegal activity or (b) to comply with a legal obligation where applicable.

**Marketing & Associated Profiling-** to alert you to information about events, surveys, competitions, offers, products, services and other exciting updates relating to us, and/or commercial partners.

We only do this through email, sms, automated phone calls or online direct messaging (such as using any private message facility on the Club website or as may be permitted on associated social media platforms) where you have agreed, so this is on the basis of your consent. However, if you are an existing customer we may contact you about our products or services similar to those you have previously received or enquired about (unless you have chosen not to receive such communications).

You can change your mind or adjust your preferences any time afterwards either in your personal profile page (also known as a 'preference centre') which is accessible from all of our emails, or emailing us at [info@stevenagefc.com](mailto:info@stevenagefc.com). We will also stop sending these in direct response to any other express communication from you asking to do so. We may measure the effectiveness of our communications, including Usage Data relating to newsletters and other marketing emails as set out in the "What information do we collect?" section above.

We also use tools to help us and our advertising network make relevant advertising available to you when you use the Online Facilities and our associated social media platforms (including facilities made available for this purpose by Facebook), and measure how effective that advertising is. To do this we rely on cookies, which may include codes associated with your device but do not themselves identify you by name. As mentioned earlier, full information on which cookies we use is available in our Cookies Policy, along with guidance about how you can set your browser to refuse all or some cookies. This type of bespoke advertising (and any postal marketing) is carried out on the basis it is necessary for the legitimate interests of us or applicable commercial partners in marketing relevant products, services and exciting offers.

**Research, Analysis & Personalisation-** to carry out market research so that we can improve the products and services we offer, and in some circumstances personalise content (including advertising as mentioned earlier) delivered to you. Your feedback is valued and helps to inform the commercial strategy, marketing activity and initiatives across the Club. This will be necessary for our

legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our commercial and marketing strategy.

We may also process your personal data for other reasons, in compliance with the above rules, where this is required or permitted by law. Where we reasonably consider that we need to process your personal data for another reason that is compatible with the original purpose set out in this Policy we will do so. If that is ever the case and you wish to get an explanation as to how processing for any new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. In some circumstances, this may require your consent.

## **8- How We Store Your Information & For How Long?**

### **Location**

We are committed to protecting the security of your personal data, which we generally hold in secure data centres in the European Economic Area (EEA).

Some organisations to which we may disclose your personal information may be situated outside of the EEA. Whenever we transfer your personal data out of the EEA, we take reasonable steps to ensure that your information is still properly protected. This may include safeguards such as checking the relevant countries have been deemed to provide an adequate level of protection for personal data by the European Commission, or using contractual provisions to ensure your information is properly protected (certain contracts are approved by the European Commission).

In relation to personal data sent to the US, we usually check whether the 'Privacy Shield' applies – that ensures a similar level of protection to personal data shared within the EEA.

See [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en), for further details.

### **Duration**

We will keep the personal data you have provided only for as long as we require to fulfil the purposes we collected it for, including for the purposes of 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 potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means. This is in addition to any applicable legal requirements. Details of any specific retention periods for different aspects of your personal data are available on request by contacting us at [info@stevenagefc.com](mailto:info@stevenagefc.com).

For legal reasons we may have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for up to seven years after they cease being customers– this is particularly for any paid for products or services.

In some circumstances you can ask us to delete your data: see the "What are your rights?" section below for further information.



We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **Security**

We have put in place appropriate operational, technical and security measures to reduce the risk of your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. This includes use of encryption where relevant, for example in relation to financial information you provide through online services which is encrypted for additional security. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

If we have given you a password to access certain parts of the Online Facilities, you must keep the password safe and make sure you use a secure browser.

## **9- Who We Provide Your Information To?**

- We may disclose your information to third parties as follows: to other companies within our corporate group, including any of our affiliated community trusts and charitable schemes.
- To third parties to whom we may choose to merge with, sell or transfer all or parts of our business or our assets (or businesses we may acquire). New owners of our business may use your personal data in the same way as set out in this Policy;
- To service providers who carry out some data processing activities on our behalf. For example, mailing services, payment processing, IT infrastructure, software and hosting, analytics, and advertising delivery service providers, along with other relevant partners used to help us deliver the Online Facilities to you.

We do not allow our third-party service providers to use your personal data for their own purposes unless they can otherwise lawfully do so;

- To our commercial partners or sponsors. For example, if required for prize or opportunity fulfilment in relation to promotions you engage with (but only for direct electronic marketing purposes where you have agreed to this).
- Other organisations in the football industry where required for completion of the purposes set out in this Policy, such as other football leagues, clubs, governing bodies, and match venues. For example, if you enter a competition and win tickets to a match we may need to share details with the stadium or participating clubs, for ticket delivery and/or health and safety or other legal reasons;
- To professional advisers including lawyers, bankers, auditors and insurers where required for those parties to provide services to us;
- To law enforcement agencies, Courts or other dispute resolution forums, or other legal or regulatory authorities if we are under a duty to disclose or share your personal data to comply with any legal obligation, or are enforcing or protecting our rights, or lawfully co-operating in the protection of third party rights; and/or

- To any credit reference or similar pre-service or communication vetting agency (if any) for the purposes of fraud protection and credit risk reduction in relation to paid for services you request from us or assisting our compliance with lawful requirements.

We may have to share your personal data with the parties above for the purposes set out in the “What do we use your information for?” section of this Policy. In some circumstances, there may be other lawful reasons for the third party to use your data in accordance with any privacy notice they make available to you.

We may also provide anonymised Aggregated Data to third parties. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

## **10 -Your Rights?**

Under the Data Protection Laws you may have the following rights in relation to your personal data in certain circumstances:

**Request Access:** (also known as a "Subject Access Request"). You can receive a copy of the personal data we hold about you.

**Request Correction:** You can have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of new data you provide.

**Request Deletion:** You can ask us to delete or remove personal data in certain circumstances, for example where: there is no good reason for us continuing to process it; you have successfully exercised your right to object to processing (below); or where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

**Object to Processing of your personal data:** this applies where: we are relying on a legitimate interest or those of a third party (see the “What do we use your information for?” section above) and you feel our processing on this ground impacts your fundamental rights; or where we are processing your personal data for direct marketing purposes.

**Request Restriction of Processing:** you can ask us to suspend processing of your personal data where: you want us to establish the data's accuracy; our use of the data is unlawful but you do not want us to erase it; 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 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:** you can ask us to provide to you, or a third party of your choice, your personal data in a machine-readable format. This right only applies to automated information which: you initially provided consent for us to use your data (see the “What do we use your information for?” section above); or your provided and we used the information to perform a contract with you (see the “What do we use your information for?” section above).

**Right to withdraw consent:** This only applies where we are relying on consent to process your personal data (see the “What do we use your information for?” section above). If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

All requests set out in this section or other queries relating to this Policy should be addressed to Stevenage Football Club Limited. See the “Who can you contact for further details?” section below. Please note we may not always be able to comply with your request due to our legitimate interests or other legal reasons. If applicable, these will be notified to you in response to a relevant request.

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

For security reasons, 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). We may also ask you for further information in relation to your request.

If you have any concerns about how we use your data you also have the right to raise this with the Information Commissioner’s Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (<https://ico.org.uk>). However, we will always try to help with any concerns so ask that you contact us in the first instance.

## **11 - Who Can You Contact for Further Information**

The Data Controller, Stevenage Football Club, The Lamex Stadium, Broadhall Way, Stevenage, Hertfordshire, SG2 8RH and or by email to [info@stevenagefc.com](mailto:info@stevenagefc.com)

## **12 - Cookies Policy**

This Cookies Policy applies to the official Club website and official mobile application (operated by EFL Digital on behalf of the Club) (“Online Facilities”) and should be read alongside the EFL Digital Privacy Policy which explains who we are, the type of information we may hold about you and how we use it.

The Online Facilities use cookies. A cookie is a small file containing an identity code. With your consent, your device accepts the cookie and stores it. When you next visit the Online Facility, the code is retrieved, allowing an individual visitor or device to be recognised.

Cookies are used for a variety of purposes, including providing personalised web pages and recognising your choice of language. Cookies do not cause harm to your device, but, if you wish to stop your computer accepting cookies, go to the help section of your internet browser (for example, Internet Explorer or Firefox) where you will find information on how to do this.

### **Google Analytics**

Google Analytics uses traffic log cookies to gain information about the use that is made of pages on the applicable Online Facilities. We use the information from these cookies to generate reports on the usage of the applicable Online Facilities which are used for evaluation and analysis. The purpose is to improve the Online Facilities by tailoring them to the needs of users.

In addition to standard analytics parameters, we receive data via Google Analytics Advertising Features including information about 'Demographics and Interest Reporting' which gives us greater insight into the types of visitors we receive.

As part of our use of Google Analytics your 'User ID' may be provided to Google Analytics. However, we do not supply any personally identifiable information to Google, in accordance with the [Google User ID Policy](#). As a user, you can opt out of this process of collecting traffic log data. To do so please visit the following site which provides a browser add-on that enables a user to opt out

### **Miscellaneous**

All modern browsers allow you to change your cookie settings. These settings will typically be found in the 'options' or 'preferences' menu of your browser.

Turning cookies off when using the Online Facilities, may interfere with your ability to use services on the relevant Online Facility to which the cookies apply.

For further information about cookies and how to control their use, please visit the following third party educational resources:

[www.allaboutcookies.org](http://www.allaboutcookies.org) and

[www.youronlinechoices.eu](http://www.youronlinechoices.eu)