

The Pro Coach App - Privacy Notice

Our contact details

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Address: Brunel Building, 57 North Wharf Road, W2 1HQ

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Important information and who we are

Partners

The Pro Coach App is a tool developed by the Integrated Coaching Strategy (“**ICS**”) partners, comprising:

The Football Association Premier League Limited (“**Premier League**”);

Women’s Super League;

Women’s Championship;

The Football Association Limited (“**FA**”);

Football League Limited (The) (“**EFL**”);

League Managers’ Association (“**LMA**”);

League Coaches’ Association (“**LCA**”); and

Professional Footballers Association (“**PFA**”),

together, the “**Partners**”.

The Partners (“**we**” or “**us**”) are committed to protecting the privacy and security of your personal information. This privacy policy describes how we collect and use personal information about you in accordance with data protection laws.

Coaches

Admission to the Pro Coach App will be at the complete discretion of the Partners.

Subject to the foregoing, all football coaches who are licensed in England to UEFA B Level and above, may register for the Pro Coach App whether or not they are currently in employment and coaches who are currently qualifying for their UEFA B license may request to register for the Pro Coach App.

To the extent that coaches are already registered on the Premier League's Staff Registration System ("**SRS**"), at the point of signing up to the Pro Coach App, their details will be moved onto the Pro Coach App by the Partners using the appropriate FAS or FAN identifier and the coach may be contacted by the Partners to confirm that the correct match is made.

Pro Coach App Services

The Pro Coach App:

- is a self-development tool designed to support and enable coaches to make the most of their capabilities and careers in professional football;
- provides a single point of access to all relevant coach development and education services provided by the Partners and offers portable tools to support coach self-awareness and development planning and career progression;
- provides a unique communication channel between the coach development and education community and suitably qualified coaches in both the Men's and Women's professional games in England;

Coaches register for the Pro Coach App using their personal email addresses. Personal email addresses are used as it is intended that the Pro Coach App supports coaches throughout their entire career journey, through different employers.

The type of personal information we collect

In order to use the Pro Coach App, coaches must register the following information:

- Name
- Personal email address
- Mobile phone number
- FAN Number

To tailor the experience offered by the Pro Coach App to coaches, the following information is collected by the Pro Coach App at the user's discretion and may be used (in a way that is not personally identifiable to the individual coach) for summary workforce analysis to support the Partners in delivering the Services:

- Area of location
- Age range (optional)
- Area of the game that the coach works in (youth, senior, men's, women's etc.)
- Role type (coach, manager, tech director, developer, other)
- Declared preferences and interests
- Materials and services accessed via the App
- FAN Number (if known)
- FAS ID (if known)

Special Category Data

- Gender
- Sex
- Ethnicity
- Religion

The coach agrees that the relevant FAN number and FAS ID may be used by the Partners to access information held in other Partner systems (with the exception of HR systems) to present and use within the App for the purposes listed in this agreement, including:

- Qualifications
- Continuing Professional Development (CPD) information
- Other educational and development information that may be relevant to the services provided by the App

Data we collect from using the app

Where you provide your consent, we use Google Analytics tracking technologies to collect information about how you use The Pro Coach App. This includes IP addresses.

Google Analytics processes information about:

- the pages you visit on the Pro Coach App
- how long you spend on each page
- how you got to the app
- what you click on while you're visiting the app

We make sure you cannot be directly identified by Google Analytics data. We do this by using [Google Analytics' IP address anonymisation feature](#). We will not combine analytics information with other data sets in a way that would directly identify who you are.

Why we collect this data

We collect this data to ensure the app is functioning and to make improvements to the app.

What we do with your usage data

The data we collect with Google Analytics cookies is transferred and stored with Google where we analyse it with Google Analytics software (Google Analytics 4). We do not allow Google to use or share this data for their own purposes.

We will not:

- sell or rent your data to third parties
- share your data with third parties for marketing purposes

To improve your experience and better understand how our app is used, we collect information about the content you interact with during your session. This includes:

- The specific content items you select or view
- The number of times each item is viewed

This data helps us:

- Improve the relevance of our content
- Monitor usage trends and app performance

We store this information temporarily in a secure, in-memory data store (Redis). It is linked to your user account for and is automatically deleted after a short retention period. This data is not stored permanently.

How the Partners get the personal information and why we have it

Most of the personal information the Partners process is provided to the Partners directly by you for one of the reasons set out below.

The Partners also receive personal information indirectly, from the following sources in the following scenarios:

- The Premier League Staff Registration System – [if a Coach’s details are already stored on the SRS].

The Partners use the information that is on the Pro Coach App in order to:

- provide the services of the App as described and tailor the experience on the Pro Coach App to the coaches declared needs, interests and preferences
- communicate with the coaches;
- confirm a coach’s identity and eligibility for the Pro Coach App;
- to facilitate general initiatives and projects of the Partners and to further develop the Professional Leagues within English football;
- to administer, deliver and support the education and development opportunities offered by the Pro Coach App.

How the Partners share your personal data

The Partners may share this information with each other, for the purposes set out above.

The Partners may also share this information with authorised third parties who will process the personal data as a Data Processor, for the purpose of maintain and operating the Pro Coach App:

- Heroku Inc. (cloud service provider)
- Auth0 who provide user authentication services for the Partners and only hold personal email addresses of Coaches

What is the lawful basis for processing your personal data

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting the Premier League at dataprotection@premierleague.com.

(b) We have a legitimate interest.

How we store your personal information

Your information is securely stored.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purpose of providing the Pro Coach App and tailoring your experience on the Pro Coach App to your specific needs.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of that personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we collected it and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Data Retention

The Premier League will retain your personal data in accordance with paragraph 9 of the Premier League data retention policy.

<https://www.premierleague.com/privacy-policy#:~:text=9.-,Data%20Retention,our%20internal%20Data%20Retention%20Policy>

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at

app@ics-football.org

The Football Association Premier League Limited

Brunel Building, 57 North Wharf Road

London, W2 1HQ

(0)207 864 9000

if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Premier League Data Protection Lead

The Football Association Premier League Limited

Brunel Building, 57 North Wharf Road

London, W2 1HQ

dataprotection@premierleague.com

(0)207 864 9000

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>