**Privacy Notice**

**SELBY TOWN FOOTBALL CLUB**

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| **LOCATION** | **SELBY TOWN FOOTBALL CLUB** |
| **RESPONSIBLE PERSON** | **THE DATA PROTECTION OFFICER** |
| **DATE** |  |

At Selby Town FC, we are committed to protecting your personal information. We have published this privacy notice to ensure that you are fully aware of what personal information we collect from you, how we use it, who we share it with and what your rights are.

This privacy notice answers the following questions – please click on the links below to take you directly to the answers to each question.

**1.0 Who Are We?**

"We", "our" or "us" means Selby Town FC AFC (“STFC”). Our address is Fairfax Plant Hire Stadium, Richard Street, Selby, YO8 4BN. We are the controller of your personal information. This means that we are responsible for deciding how we collect, store and use personal information about you. If you have any questions about this privacy notice or how we use your personal information, please contact our Data Protection Officer at info@selby.town

**2.0 What personal information do we collect and use and what is our legal basis for using it**

Please note, where you have given us consent to use your personal information you can withdraw your consent at any time by clicking the unsubscribe button in any email correspondence we send to you or by contacting our Data Protection Officer info@selby.town

**2.1 Personal information from online customers and customers who visit our** **ground.**

**If you browse our website**

*Personal information we collect:* We use both essential and non-essential cookies on our website which collect information from you such as your browsing patterns and information about the device you are using.

*How we use your personal information:* To inform our marketing and future business strategies. Full details of how we use cookies can be found in our cookies policy.

*Legal basis for using your personal information:* Information collected via essential cookies: we will use your personal information on the basis that it is in our legitimate interests to do so. We consider that this use is proportionate because the website will not work without them (e.g., to remember your order(s) at checkout. Information collected via nonessential cookies: for example, to recognise you if you have visited our website before, we will use your personal information on the basis that you have given us your consent. You can withdraw your consent at any time by deleting our cookies or by managing your browser’s cookie preferences. For further details on how to manage your preferences please see aboutcookies.org or www.allaboutcookies.org.

**If you choose to sign up to receive news, online content, marketing and/or competitions**

*Personal information we collect:* Your full name, email address, contact telephone number and any marketing preferences which you might have provided to us.

*How we use your personal information:* To send you news, online content, marketing, deals (including details of upcoming events) and behind the scenes footage which we think you might be interested in. We may tailor the information and offers we send to you to ensure that the information and offers we are sending are relevant. For example, if you are interested in our upcoming fixtures and tickets, we may tailor the information we send to you to reflect this.

*Legal basis for using your personal information:* You have given us consent.

**If you use our online store to purchase tickets**

*Personal information we collect:* Your full name, date of birth, email address, contact telephone number, gender (optional) and payment details.

*How we use your personal information:* To deal with the purchase of tickets using Square (acting as a data processor on our instruction).

*Legal basis for using your personal information:* It is necessary for the performance of our contract with you.

**If you use our online store to purchase merchandise**

*Personal information we collect:* Your full name, date of birth, email address, contact telephone number, address, and payment details.

*How we use your personal information:* To deal with your purchase.

*Legal basis for using your personal information:* It is necessary for the performance of our contract with you.

**If you contact us**

*Personal information we collect:* Your full name, email address, contact telephone number, postcode and details of your enquiry or issue.

*How we use your personal information:* To access your account (if you have one) and to respond to you and to investigate, consider and deal with any enquiry or issue you have raised. In order to ensure that you receive our best customer service, we will retain previous conversations which we have had with you.

*Legal basis for using your personal information:* It is in our legitimate interests to run our business.

**If you attend our ground**

*Personal information we collect:* We use CCTV cameras to capture images.

*How we use your personal information:* We collect, store and use these images for security and prevention/detection of crime, for the safety of our people at our Ground and in certain circumstances to verify information (e.g. to establish facts in relation to health and safety incidents or employment issues).

*Legal basis for using your personal information:* It is in our legitimate interests to be able to keep our premises secure, to keep our volunteers and visitors safe and to verify important information. We will only use this personal information in order to maintain the security of our premises, to keep our players and visitors safe or when using the images to verify information. This will only be done where we have cause. In addition, we have put up notices informing visitors that we use CCTV, we restrict access to the images to authorised staff and we keep the personal information obtained for only a limited period of time up to 35 days.

**Other personal information we collect.**

*Personal information we collect:* Personal information you have provided, or we have collected.

*How we use your personal information:* For the purposes of bringing or defending any legal proceedings or meeting any legal or compliance obligations we have.

*Legal basis for using your personal information:* it is necessary for the performance of our contract with you (where it relates to a contract we have in place) or that it is in our legitimate interests as a business to be able to bring or defend any legal proceedings.

**2.2 Personal Information from suppliers**

**Information we collect direct from suppliers**

*Personal information we collect:* Your name, name of company of business you work for, contact details including your email address, phone number and address, and bank details of you or the business you work for (as applicable).

*How we use your personal information:* • To negotiate and conclude contracts for the purchase of goods and/or services from you or the business you work for • To set up you or the business you work for as one of our suppliers; • To manage the ongoing contract, including ordering, delivery, invoicing and payment; • To manage our ongoing projects which you are engaged to work on; ensure compliance with legal obligations such as record keeping obligations • To deal with any disputes

*Legal basis for using your personal information:* Our legitimate interest to use this information to administer the contract and project which you are engaged to carry out for us. We only use your personal information for matters which relate directly to your supplier relationship with us. We do not use them outside the business context.

**235 Personal information from permanent or temporary players (N.B. professional football players have a separate privacy notice), contractors and volunteers.**

**2.3.1 Personal information about players and contractors**

**2.3.1.1 Information we collect before you join the Club**

We collect, store and use the following personal information: your full name, address (including postcode), date of birth, national insurance number, email address, home telephone number, mobile telephone number, passport number, gender, bank details, drivers licence (if applicable), details of any right to play documents, and two emergency contacts for you (name, their relationship to you and contact phone numbers and email address).

We may also collect, store and use “special categories” of more sensitive personal information as part of the ‘Personal Health and Capability Declaration which could include information about your health, including any medical condition or disability where this relates to your capability to perform your role.

**2.3.1.2 Information we collect when you start your employment**

In addition to the personal information above, we will also put together other personal information about you and store it on our internal files. This will include information about your role, expenses, job specification, and location.

**2.3.1.3 Information we collect during your player status**

We will collect, store and use the following personal information during the course of your employment including details of any absences you take, notes from any performance meetings, notes from any disciplinary meetings we have with you, and training records. We also collect, store and/or use your personal information to monitor access to our premises, security, health and safety and CCTV. We will retain CCTV images for a period of up to 35 days. We will also collect more sensitive categories of personal information which will include information about any further medical information which you provide to us.

**2.3.2 Personal information we collect about our volunteers**

**2.3.2.1 Information we collect before you start as a volunteer**

We collect, store and use the following personal information: your full name, home address, contact details, role applied for, education, experience, training and qualifications (UKCC Level 2 coaching qualification in Football, FA Emergency Aid, and FA Safeguarding Certificate). We will also collect more sensitive categories of personal information which will include information about any criminal convictions you give us details of, and any further medical information which you provide to us.

**2.3.2.2 Information we collect during your volunteering**

We will collect, store and use the following personal information during the course of your volunteering with us including details of any training records.

We also collect, store and/or use your personal information to monitor access to our premises, security, health and safety and CCTV. We will retain CCTV images for a period of up to 35 days.

**2.3.3 How we use the personal information we collect about you and our legal basis for using it**

We have set out below how we use your personal information. In addition, we have set out our legal basis to use your personal information as we need to tell you this under data protection law.

**2.3.3.1 Information we use to run the business**

We will collect, store and use your personal information for the purpose of running the business.

If you are an player, contractor, or volunteer we will use your personal information to: • set up an player, contractors or volunteers directory; • set up email communications; • deal with legal disputes involving you, or other players, workers, contractors, and volunteers including accidents at work; • investigate, pursue or defend a legal claim; • keep our network and systems secure; • provide references; and • investigate and deal with whistleblowing issues or compliance matters.

If you are an player, or contractor we will use your personal information to: • arrange insurance; • carry out business management and planning, including accounting and auditing; and If you are an player we will use your personal information to: • create internal records e.g. meeting notes, records of training, time spent on projects, attendance at meetings or training, leavers and new starters; and • analyse our data analytics studies to review and better understand player retention and attrition rates.

The legal basis for the purposes set out above is that it is in our legitimate interests as a business to be able to use your personal information in this way to run our business and to enable you to carry out your role. We believe that this is a proportionate use of your personal information as you will see from how we use your personal information the uses are those which any well-run business would ordinarily use and we will limit the personal information to that which is necessary in accordance with our General Personal Data Protection Policy (a copy of which is available on our SharePoint site.)

**2.3.3.2 Information used for compliance**

We will collect, store and use your personal information for compliance purposes.

If you are an player, contractor, or volunteer we will use your personal information to: • comply with health and safety obligations; • prevent and detect criminal activity and fraud; • facilitate whistleblowing; and • comply with any other legal or regulatory requirements.

If you are a player or contractor we will use your personal information to: • comply with our employment obligations e.g. to check you are legally entitled to play in the UK; • provide appropriate reasonable adjustments for players or contractors; • carry out audits to comply with legal requirements; • comply with tax and national insurance obligations.

If you are a volunteer we will use your personal information to: • carry out DBS checks • ensure child welfare and safeguarding.

Our legal basis for the purposes set out above is that we need to collect, store and/or use your personal information to meet our legal obligations.

**2.2.3.3 Information used for monitoring**

We will collect, store and use your personal information for the purpose of monitoring your use of our information and communication systems to ensure compliance with our company policies/compliance issues. Our legal basis for this uses it that it is necessary for performance of your employment, contractor or volunteer contract with us.

We will collect, store and use your personal information for the purposes of monitoring access to our premises, security, health and safety and CCTV. Our legal basis for this use is that it is in our legitimate interests as a business. We consider that it is in our legitimate interests to ensure that our premises are secure, that people on site comply with health and safety requirements.

We consider that this use of your personal information is proportionate because we limit our use of personal information to that which is necessary for the monitoring and do not carry out continuous monitoring of your behaviour.

**2.3.4 How we use your sensitive personal information and our legal basis for using**

If you are a player or contractor we will use the sensitive personal information to: • investigate and report any Health and Safety incidents; • monitor your sickness to manage absence and administer benefits; • assess your fitness to work (relating to both physical or mental health); and • assess your disability status to provide appropriate reasonable adjustments in the workplace.

If you are a volunteer, we will use the sensitive personal information to: • carry out DBS checks.

Our legal basis for the above purposes is as set out above and if you are an player or contractor, on the additional condition that it is necessary for the purposes of carrying out our obligations in the field of employment law, and if you are a volunteer, on the additional condition that it is necessary for the purposes of safeguarding children.

**3.0 Can we change the purpose for which we use your personal information?**

We will only use your personal information for the purposes set out above unless another purpose we want to use it for is compatible with those original purposes. If we change the purpose for which we are using your personal information and you would like an explanation as to how the new purpose is compatible with the original purpose, please contact our Data Protection Officer at info@selbytown.co.uk. If we would like to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do this.

**4.0 How long will we keep your personal information?**

We retain personal information we collect from you where we have an on-going legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal tax or accounting requirements).

When we have no on-going legitimate business need to process your personal information, we will either delete or anonymise it or, if this is no possible we will securely store your personal information and isolate it from further processing until deletion is possible.

Please contact our Data Protection Officer at info@selbytown.co.uk if you would like any further information about our retention periods. If a dispute arises between us, we will keep your personal information for the purposes of responding to and dealing with this dispute and this may mean that we keep your personal information for longer.

**5.0 Who will we share your personal information with?**

We may share your personal information with trusted third parties from time to time. We will not, however, share your personal information with a third party for them to market to you unless we have your consent to do this. We do not sell any personal information to any third party so that they can send you their marketing material. We will only share your personal information with third parties where it is reasonable to do so.

**IT Suppliers**: We use reputable third parties to provide us with our IT systems (including our website) and support for them. They may access your personal information to the extent that they need to in order to provide their services and deal with any issues.

**With a company that we merge with or transfer our business assets to**: In the event that we sell all or part of our business, or merge with another company, we may transfer personal information that we have collected as described in this notice, along with our other business assets, to the company that we are selling to or merging with.

**Professional Advisors**: We may also share your personal information with our professional advisors (including lawyers, insurers and/or insurance brokers) to take advice e.g., in connection with any complaint or claim which you (or the company you work for) make and to complete yours (or the company you work for) purchase, tribunals, enforcing the terms of our agreements.

**With entities, companies or individuals outside our group for legal reasons**: We will share your personal information with entities, companies or individuals outside our group where this is necessary to comply with any law, rule, regulation, legal procedure or governmental request that is applicable to us. We may also share your personal information with the police or other law enforcement organisations where we are required or permitted to do so.

**5.1 Additional entities we share personal information with from online customers and customers who visit out ground**

We have set out below the third parties we may share your personal information with. If we do this, we will put in place a contract with them which controls how your personal information may be used and which requires that your personal information is treated in accordance with data protection laws:

**Card Payment Processor**: If you are a customer and you purchase a product on our website, we will share your personal information with payment processing companies and/or Direct Debit providers who process our card payments to ensure that your payments are completed securely.

**Delivery companies**: In order to complete an order, we may share your personal information with appointed delivery service providers in order to deliver the products you have ordered.

**Marketing and Media Companies**: We may use reputable third parties such as Mailchimp to send out our marketing material. They may access your personal information to the extent that they need to in order to provide their services.

**Sponsors and Partners:** If you have consented to receiving it, we may send you, in our marketing communications, information about products and services provided by our existing partners.

**5.2 Additional entities we share personal information with from players, contractors and volunteers**

We will only share the personal information that you give us with the following third parties and for the following reasons:

**With customers, suppliers, players, academy players and their parents where you deal with or have contact with them**: We will share relevant personal information with our customers, suppliers, players, academy players and their parents where you have contact or dealings with them as part of your role e.g. where you are their contact point for their purchase or coaching session, or where you deal with any issues or complaints which they might have.

**5.3 Additional entities we share personal information with obtained from CCTV**

We will only share the personal information that you give us with the following third parties and for the following reasons:

**With companies who assist us with providing security for our premises**: We use reputable third parties to assist us with providing security to our UK sites. They may access your personal information to the extent they need to in order to perform their role.

**With law enforcement agencies for safety and security purposes**: In the event of an investigation, we may share CCTV recordings with the law enforcement agencies in order to verify identity and, if criminal behaviour is involved, take appropriate action.

**5.4 Additional entities we share personal information with about students and prospective students on our educational programmes**

**Educational institutions** who share the administration or jointly run courses with Selby Town FC.

**Prospective employers** or other organisations who request a reference for you.

**6.0 Do we transfer your personal information outside the UK/EEA?**

European Economic Area (“EEA”) countries are all EU Member countries together with Iceland, Liechtenstein and Norway. We store your personal information in the United Kingdom or in countries within the EEA. We only transfer your personal information outside the EEA where our third-party service providers e.g. Mailchimp who we share personal information with (as set out above) are based outside the EEA.

We only transfer your personal information outside the EEA where we have a legal basis for doing so and where we require that your personal information is protected to the same standard as it would be protected in the EEA. We do this by entering into data sharing agreements with the recipients of your personal information based outside the EEA which comply with the EU Commission’s standard clauses for the transfer of personal information.

**7.0 How do we keep your personal information secure?**

We have put in place appropriate physical, electronic and organisational procedures to safeguard and secure the information we collect to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those players, agents, contractors and other third parties (see above) who have a business need-to-know.

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

Our security procedures mean that we may request proof of identity before we are able to disclose personal information to you.

**8.0 What rights do you have over your personal information?**

You have a number of other rights over your personal information, which are: 1) the right to ask us what personal information we have about you and to have a copy of your personal information from us; 2) the right to ask us to correct any errors in your personal information; 3) the right to object to our legitimate interests, profiling activities and marketing communications; 4) the right to ask us to provide you with a copy of the personal information you have provided to us, in a structured, commonly used and machine-readable format and the right to transmit that personal information to another entity where: (i) we are using your personal information on the basis of your consent or on the basis that it is necessary to perform a contract with you; and (ii) the use we are making of your personal information is carried out by automated means; 5) the right to ask us to delete your personal information where: (i) we don’t need your personal information anymore; (ii) you withdraw your consent to our use of your personal information and we have no other legal basis to keep your personal information; (iii) you have asked us to review and explain our legitimate interests to you and we don’t actually have a valid legitimate interest to do what we are doing; (iv) our use of your personal information is illegal; (v) we have to delete your personal information to comply with our legal obligations; 6) the right to ask us to restrict the use that we are making of your personal information where: (i) you don’t think the personal information we have about you is correct, so that we can check if it is correct; (ii) what we are doing with your personal information is illegal but you would rather we stop using your personal information rather than delete it; (iii) we don’t need your personal information anymore, but you need us to keep it so that you can exercise any legal rights; and (iv) you have asked us to review and explain our legitimate interests to you, so that we can check whether we actually have a valid legitimate interest to do what we are doing; 7) where our use of your personal information is based on your consent, the right to withdraw your consent at any time by contacting our Data Protection Officer at info@selbytown.co.uk; and 8) the right to make a complaint at any time to the Information Commissioner’s Office (ICO), (the UK regulator for data protection issues. See www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO and so, if you are happy to do so, please contact our Data Protection Officer at info@selby.town

**9.0 Does this privacy notice cover websites you link to from our website?**

Links within our website to other websites, such as Facebook, Instagram and Twitter, are not covered by this privacy notice. You should review the privacy information on those other websites to find out how they may use your personal information.

**10.0 How will you tell me about changes to this privacy notice?**

We keep our privacy notice under regular review. Any changes we make to our privacy notice in the future will be posted on this page and if the changes will have an effect on you or the way we use your personal information we will bring them to your attention by email where appropriate. Please check back frequently to see any updates or changes to our privacy notice. This privacy notice was last updated 02/04/2021.

**11.0 How can you contact us?**

If you have any questions about this privacy notice or about the ways we use your personal information, please contact our Data Protection Officer at info@selbytown.co.uk or Selby Town FC, Fairfax Plant Hire Stadium, Richard Street, Selby, YO8 4BN.