

CLUB PRIVACY NOTICE

Leighton United Football Club takes the privacy of personal information very seriously.

This Privacy Notice provides details about:

- The personal information we collect from you
- How we use the information
- Who we share information with

General

Personal information in both paper and electronic formats must be managed in accordance with the General Data Protection Regulations (GDPR). Under GDPR requirements the club is the data controller and thereby responsible for the processing of all personal information provided. We are committed to respecting and protecting your privacy and keeping personal information confidential and secure.

What personal information might we collect from you or hold about you

For the purposes of this privacy notice, personal information/data is any information from which you can be personally identified. In relation to the club this includes, but not necessarily limited to:

- Name
- Age/date of birth
- Gender
- Proof of identity, e.g. copies of birth certificates, driving licences or passports
- Address
- Contact phone numbers
- Email address
- Role at the club
- Football Association reference number (FANs)
- Football related qualifications and certifications
- Disclosure and Barring Service (DBS) check certificate numbers and issue dates
- Information required by the player registration process as set out on the current player registration form
- Photographs
- Financial information related to the payment of annual playing fees
- Football disciplinary record
- Player transfer records
- If you contact us by email or letter, we may keep a record of the correspondence
- Occupation or employment status
- Personal identification evidence required to process DBS checks will be managed confidentiality by Club Welfare Officers verifying such documents.

Sensitive personal information

• For player's health, wellbeing, welfare and safeguarding, during player registration information will be requested on medical conditions and contact details in the event of an emergency. Health information is classed as special category personal data. Where we hold such information about children, i.e. those aged 18 and under, it will be with the consent of the child's parent, guardian or carer as confirmed by signature on the player registration form. For players aged over 18 consent will be by player's signature on the registration form.

Accuracy

• Personal data held will be checked at the time of collection to ensure it is accurate and up to date.

How we may use your personal information

• Personal information will only be collected and processed for legitimate football related purposes as required by the Football Association (FA), by football leagues to which club teams are registered and as required for the effective running of the football club.

Uses may include, but not be limited to:

- Processing annual player registrations
- Processing of annual playing fee payments
- Verification of identity
- Maintaining lists of current players and coaches
- Maintaining accounts
- Organising matches and training sessions
- Sending out club information and news updates
- In association with volunteer recruitment
- As required for Football Association affiliation
- To respond to enquiries and complaints

Where we need to collect personal data to comply with football authority and/or club requirements and that information is not forthcoming then it may not be possible to register the player.

Legal basis for processing personal information

The main lawful bases are consent, contract and legitimate interests. All personal information collected will be fairly, lawfully processed and in a transparent manner.

- In effect completion of a player registration form forms a contract with the club. This includes matters on which consent is sought.
- Club official's consent will be obtained for their personal information to appear in publicly available publications and on the website.
- Where necessary for requirements of football authorities and football leagues.
- For the club's legitimate football related interests.

Sharing personal information

 Personal information about players, coaches and club officials will be entered onto the Football Association (FA) Whole Game System (WGS) database as required by The FA. The FA confirm that their systems used by club, including the WGS meet requirements on information security and comply with GDPR requirements.

- The County FA should be contacted to request the removal of personal information from FA systems.
- Personal information may be shared with the County FA, football leagues or other legitimate football organisations to register players and/or club teams for matches, football tournaments, football festivals, other football related events, and for affiliation purposes.
- Personal information may be shared internally between Management Committee members when required for management purposes.
- Personal information may be shared with coaches, team managers or club officials in connection with matches, training sessions or other football related events.
- Anonymised data may be shared with funding partners as a condition of grant funding, applications for funding being a purpose that benefits the club.
- We may share your personal data with selected third parties, suppliers and sub-contractors such as referees, coaches or match organisers. Third-party service providers will only process your personal data for specified purposes and in accordance with our instructions.
- We may disclose your personal information to third parties to comply with a legal obligation; or to protect the rights, property, or safety of our participants or affiliates, or others.

Club website

• The website operates on the Pitchero platform. In their privacy policy Pitchero confirm that personal data held on the platform is processed in compliance with the GDPR Regulations.

Email

- The completion of player registration forms confirms consent to receive information about club events and products.
- Consent must be freely given, specific, informed and unambiguous.
- Personal email addresses will not be used for cold marketing of services and products that are not club related.
- For people who have been interested in the past it should not be assumed they generally still are. Advice is to ensure that future emails only relate to subject areas they originally agreed to receive.
- Withdrawing permission/consent can be done by contacting the club via the website.

Protection of your personal data

- All club officials holding personal information for football related purposes have a duty to comply with this privacy notice. This includes coaches, team managers, club secretary, club football league secretaries, club welfare officers and the treasurer.
- Those holding personal information will always ensure secure retention. Data stored on personal IT devices should be password protected and backed up to minimise the risk of accidental loss. Hard copies can be stored in locked cupboards in the clubhouse with restricted access.

• Personal information will be securely transferred between club officials, be always treated as confidential and only on a need-to-know basis.

How long we hold your personal data

- Personal information will be kept for no longer than necessary.
- Hard copies and electronic versions of completed player registration forms will usually be retained for the football season for which they are applicable.
- Personal information for club officials, coaches, team managers and other volunteers will usually be retained for as long as individuals are with the club.
- Some personal data may need to be retained for longer for legal or regulatory purposes.
- Financial data will be retained for at least six years.
- Obsolete information will be deleted (hard copies by shredding).

Your rights regarding your personal information

- To be informed about the collection and use of your personal information.
- To request access at any time to personal information the club hold on you. Requests should be sent to the Club Secretary. The club will aim to respond within one month.
- That we correct any personal information if it is found to be inaccurate.
- To request that personal information is erased from the club's records when it is no longer necessary for us to retain such information.
- To restrict processing of personal information. When processing is restricted personal information can be stored but not processed further.
- To have data portability whereby you can receive a copy of your personal information and where possible have it transmitted to another organisation or person
- To object to the processing of personal data for direct marketing.
- To complain to the UK's data protection supervisory authority, the Information Commissioner's Office if you believe the management of your personal information has been unlawful.

Personal data breaches

Suspected personal data breaches must be reported immediately to the Club Secretary who will organize an investigation, taking advice from other club officials as necessary. Investigations will be carried out confidentially. The outcomes and any lessons learnt will be reported to the Management Committee, without identifying the individuals involved.

Privacy notice issue

The current edition of this notice can be found on the website and in the policy folder in the clubhouse.

It will be reviewed annually along with other policies and procedures.

Queries about this Privacy Notice should be posted on the club's website via the contact tab then email to the Club Secretary.