



# Morecambe Football Club Privacy Notice

## Summary

Morecambe Football Club takes your privacy very seriously and is committed to protecting your personal information and handling it responsibly.

This Privacy Notice sets out how we use and look after the personal information we collect from you. We are the data controller, responsible for the processing of any personal data you give us. We take reasonable care to keep your information secure and to prevent any unauthorised access to or use of it.

## How to contact us about your personal data or this privacy policy

If you have any questions about this privacy policy or about your personal data that the Club holds, please contact us using the following details:

Data Protection Officer  
Morecambe Football Club Limited  
Christie Way  
Morecambe  
LA4 4TB

[dpo@morecambefc.com](mailto:dpo@morecambefc.com)

Please include your name, address and/or email address when you contact us.

## What personal data we hold on you

Personal data means any information about an individual from which that individual can be identified. When we provide you with products or services we may collect and store any personal information that you provide us:

- \* Name, address, delivery address, email address and telephone numbers.
- \* Payment details.
- \* A record of any communications with the Club whether by post, email, telephone or by social media.
- \* Information that you provide when you make an enquiry, complete an online form or make an event booking.
- \* Information about how you use our website and apps.



- \* Information about your attendance at matches and events.
- \* Your marketing preferences, including any consents that you have given us.

In some instances we may need to collect special category personal data, for the purposes of your health, wellbeing, welfare and safeguarding. Where we hold this data it will be with the explicit consent of the participant or, if applicable, the participant's parent or guardian.

Where we need to collect personal data to fulfil Club responsibilities and you do not provide that data, we may not be able to honour or administer your membership or services that you wish to subscribe to.

## Why we need your personal data

There are 6 lawful bases for processing personal information. Not all of them are relevant to the Club. We will only use personal data for any purpose for which it has been specifically provided. We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so:

### Consent

\* We want you to be the first to know about new signings, competitions, club news, ticket availability and occasional offers from official sponsors and partners. We can only do this if you actively opt-in to receiving marketing communications from the Club. If you haven't already signed up to receive these exciting benefits then opt-in [HERE](#). Please note, if you don't choose to receive this information, we will be unable to keep you informed of new services, products, events or special offers that may interest you and our ability to inform you of ticketing opportunities may be affected.

\* Where Special Category data is collected, the Club will only process this data with your or your parent/guardian's, explicit consent.

### Contract

A contractual obligation can exist without there being a signed document. We process your personal information for contractual reasons in the following situations:

\* Where a contract of employment exists, in order to fulfil our obligations of employing staff.



- \* To administer your account registration and competition entries and to provide products and services that you have requested.
- \* We need participants' personal information to be able to run the football club and arrange matches.

## Legal Obligation

We are legally obliged to process your personal information in cases where we need to:

- \* Obtain parental consent to provide online services directly to children
- \* Respond to certain requests by government or law enforcement authorities
- \* Comply with the conditions imposed by our ground safety certificate, issued by Lancashire County Council, to collect CCTV footage around the stadium

## Legitimate Interests

We process your personal data when necessary to pursue our legitimate interests in the following:

- \* Tailoring our websites and communications for you. We collect information about your engagement with us online to build a fuller understanding of your individual preferences.
- \* Monitoring, improving and protecting our products, content and services.
- \* Checking the credit or debit card details you provide (to process your payments and prevent fraudulent transactions).
- \* Sending you some types of direct marketing, including by email and post.
- \* Responding to your comments or complaints.
- \* Undertaking, or inviting you to take part in, market research.
- \* Querying whether you have had an issue completing an online form.
- \* Preventing, investigating and/or reporting fraud, terrorism, misrepresentation, security incidents or crime.
- \* Using incident reports and CCTV footage to: protect the security of our spectators and staff, enforce our ticketing terms and conditions and to help detect and prevent unlawful activity.
- \* Managing legal claims, compliance, regulatory and investigative matters.
- \* Processing job applications received.

You have a right to object to any processing that we undertake for our legitimate interests.





## Personal Information from third parties

Sometimes we receive information from third parties, in particular:

- \* If you register as a fan of Morecambe Football Club with the EFL or connect to the Club using social media platforms, the EFL or the social media platforms may share information that you have consented to share with the Club. You can change your preferences or unsubscribe at any time by updating your preferences on these platforms.
- \* Government and law enforcement authorities may provide us with personal information when they are involved in official enquiries.
- \* Our commercial partners may provide us with your name and contact details according to any consent that you may have given them.

## Who we share your personal data with

In order to provide our products and services to you or otherwise fulfil contractual arrangements that we have with you we may need to appoint other organisations to carry out some of the data processing activities on our behalf. These include the following:

- \* The FA, Lancashire FA and EFL. When you become a member of the Club, your information, if you are a coach or volunteer will be or if you are another participant may be (depending upon which league(s) your team plays in) entered onto the Whole Game System database, which is administered by the FA. We also pass your information to the County FA and to the EFL to register participants and the team for matches, tournaments or other events, and for affiliation purposes.
- \* Morecambe Football Club Community Sports, a charitable trust that works alongside the Club to engage with the local community.
- \* Third party suppliers involved in systems maintenance; ticketing; database management; identity checking; processing payments; delivery logistics and credit and debt management.
- \* Carefully selected sponsors and partners (as may change from time to time) but we will only do this if you have consented to receive marketing relating to our sponsors and partners or if one of the conditions in the paragraph above applies.
- \* Government authorities or law enforcement officials, to assist with their official requests and comply with our legal obligations.



- \* Recruitment and vetting agencies, to assist with our recruitment processes.
- \* Other football clubs in order to fulfil our obligations to stage football matches.
- \* Our advisers, any prospective purchaser's advisers and any new owners of the business to ensure due diligence can be completed.

## **Personal data transfers outside of the EEA**

Some of the organisations to which we may disclose your personal information might be situated outside the European Economic Area (EEA). The EEA includes all European Union countries as well as Iceland, Liechtenstein and Norway.

If we transfer your personal information to other territories, we will take proper steps to ensure that your information is protected in accordance with this privacy notice.

## **Morecambe Football Club Website**

The Morecambe Football Club website is operated on our behalf by EFL Digital. This privacy notice should be read in conjunction with our Digital Privacy Policy which can be found [HERE](#).

As with many other website operators, we use standard technology called 'cookies' on our website. Cookies are small pieces of information that are stored by your browser on your computer's hard drive and they are used to record how you navigate this website on each visit. The Digital Privacy Policy gives more detailed information on how we use cookies.

Please note that our website and other digital platforms may contain links to third party websites / digital platforms which are provided for your convenience. We are only responsible for the privacy practices and security of our own digital platforms and as such recommend that you check the privacy and security policies and procedures of each and every other website / digital platform that you visit.

## **Security of your personal data**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed:





\* Credit Card payments - When you submit your credit card details to us, we use industry standard Secure Sockets Layer (SSL) encryption technology to send the details to our payment provider. The Club doesn't store credit card details. Once a payment has been processed all credit card information is deleted.

\* Paper based systems - Any paper based records are kept in a secure, locked cabinet. All redundant records must be shredded in a secure manner.

\* Electronic records - All electronic data is password protected.

Only staff that have authority from the Data Protection Officer can access personal data records. They can only access them when it is absolutely necessary to do so and must follow the guidelines set out by the Data Protection Officer in the Morecambe Football Club Privacy Policy.

Where a password is required to access certain areas of our digital platforms, you are responsible for keeping your password secure and confidential. Please do not share or disclose your password to any other person.

## **If you are under 16**

For so long as you are under 16 we will not send you any marketing communications, or share your details with our commercial partners. However, if you have signed up to receive a product or service we may contact you about this.

## **Ages 13-15**

If you are aged 13-15, you must first tell your parent or legal guardian that you wish to register on our digital platforms and get their consent. You must make sure that your parent or legal guardian knows and agrees each time before you:

- email us, or ask us to email anything to you;
- send any information to us;
- enter any competition or game that requires information about you or offers a prize;
- purchase an official membership; or
- offer or agree to buy anything online.

If you are the parent or legal guardian of a user of our digital platforms who is aged 13 to 15 we do not seek your direct consent to their registration, but we expect them to inform you and get your agreement in advance before they register and before each time they do any of the activities listed above.



## Aged under 13

If you are under 13 and wish to register, you must truthfully tell us your name, email address, country and date of birth. Our system will then ask you for the name and email address of your parent or legal guardian. We will send them an email so they are aware of your request and will ask them for their consent and to confirm they have authority to give that consent. We need their consent or refusal within 7 days, or else we will assume consent is not granted. Their consent can be withdrawn at any stage.

Even if your parent or legal guardian gives their consent to your registration, if you are under 13 we still expect you to tell them and get their agreement in advance each time before you:

- email us, or ask us to email anything to you;
- send any information to us;
- enter any competition or game that requires information about you or offers a prize;
- purchase an official membership; or
- offer or agree to buy anything online.

## How long we hold your personal data

The following criteria are used to determine data retention periods for your personal information:

- \* Retention in the case of queries the Club will retain your personal information as long as necessary to deal with your queries.
- \* Retention in case of claims the Club will retain your personal information for as long as you might legally bring claims against the Club and vice versa.
- \* Retention in accordance with legal and regulatory requirements the Club will retain your personal information based on legal and regulatory requirements.
- \* Retention in order to fulfil a contract ñ the Club will retain your personal information for as long as necessary to fulfil our contractual obligations.

The personal data that is stored on the FA's Whole Game System is subject to their privacy policy so we advise you review that policy together with this notice. If you would like your personal data to be deleted from Whole Game System then please contact them directly.



## Your rights to withdraw consent and to object

If we rely on your consent to process your personal data, you have the right to withdraw this consent at any time. You also have the right to object to any use of your personal data for direct marketing purposes.

If you do this we will be unable to keep you informed about new services, products, events or special offers that may interest you and our ability to inform you of ticketing opportunities may be affected.

## Other rights regarding your personal data

You have the right to ask us:

- \* for access to information about your personal data or for a copy of your personal data. We will send the information to you within 30 days. A charge may apply if the request is unfounded, excessive or repetitive. The current fee is £10.00
- \* to correct or delete your personal data
- \* to restrict processing of your personal data
- \* to provide you with certain personal data in a structured, machine readable format and to transmit that data to another organisation.

Any request should be made to the Data Protection Officer by email or at the address above.

In some instance we may not be able to fulfil your request. For instance, if your request would reveal personal data about another person, or if you asked us to delete information which we are required to keep for legal reasons or have a compelling legitimate interest in keeping. If this is the case we will let you know when we respond to your request.

## How to complain

If you want to complain about any aspect of this privacy notice or how we have used your personal data then write to the Data Protection Officer using the above address or email.

If you are still not satisfied with the outcome of your complaint you can write to the Information Commissioner's Office at the following address:





Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

## **Changes to this privacy notice**

In order to provide the best service to our fans and customers all policies are constantly reviewed and updated. Make sure you check this page regularly so that you can see the latest version.

We have a legitimate interest in marketing our goods to existing customers to increase sales.