

PRIVACY POLICY

PRIVACY NOTICE

Last updated 29th June 2024

Thank you for choosing to be part of our community at AFC Wimbledon Limited ("Company", "we", "us", "our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please get in touch by <u>email</u>.

When you visit our website <u>www.afcwimbledon.co.uk</u> (the "Website"), use our mobile application as the case may be (the "App") and more generally, use any of our services (the "Services", which include the Website and App), we appreciate that you are trusting us with your personal information.

We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it.

We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.



This privacy notice applies to all information collected through our Services (which, as described above, includes our Website and App), as well as any related services, sales, marketing, or events.

Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

We collect personal information that you provide to us. We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services or otherwise when you contact us. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make and the products and features you use.

The personal information we collect may include the following:

Personal information provided by you. We collect names; phone numbers; email addresses; mailing addresses; job titles; contact preferences; contact or authentication data; and other similar information.



All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services. We automatically collect certain information when you visit, use, or navigate the Services.

This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services and other technical information.

This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

The information we collect includes:

Log and Usage Data. Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as



which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).

Device Data. We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, operating system, and system configuration information.

Location Data. We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. Note however, if you choose to opt out, you may not be able to use certain aspects of the Services.

Information collected through our App

We collect information regarding your geolocation, mobile device, push notifications, when you use our App. If you use our App, we also collect the following information:



Geolocation Information. We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our App, to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

Mobile Device Data. We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our App, we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID and information about the features of our App you accessed.

Push Notifications. We may request to send you push notifications regarding your account or certain features of the App. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our App, for troubleshooting and for our internal analytics and reporting purposes.



HOW DO WE USE YOUR INFORMATION?

We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, to enter or perform a contract with you, with your consent, and/or for compliance with our legal obligations.

We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

Request feedback. We may use your information to request feedback and to contact you about your use of our Services.

To enable user-to-user communications. We may use your information to enable user-to-user communications with each user's consent.

To manage user accounts. We may use your information for the purposes of managing our account and keeping it in working order.

To send administrative information to you. We may use your personal information to send you product, service, and new feature information and/or information about changes to our terms, conditions, and policies.



To protect our Services. We may use your information as part of our efforts to keep our Services safe and secure (for example, for fraud monitoring and prevention).

To enforce our terms, conditions, and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.

To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

Fulfil and manage your orders. We may use your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.

Administer prize draws and competitions. We may use your information to administer prise draws and competitions when you elect to participate in our competitions.

To deliver and facilitate delivery of services to the user. We may use your information to provide you with the requested service.

To respond to user inquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

To send you marketing and promotional communications. We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our



Services, subscribing to marketing or otherwise contacting us, making a purchase we will collect personal information from you. You can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS?" below).

Deliver targeted advertising to you. We may use your information to develop and display personalised content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness. For more information see our Cookie Policy.

For other business purposes. We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Services, products, marketing, and your experience. We may use and store this information in aggregated and anonymised form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

WILL YOUR INFORMATION BE SHARED WITH ANYONE?

We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations. We may process or share your data that we hold based on the following legal basis:

Consent: We may process your data for a specific purpose if you have given us specific consent under the UK General Data Protection Regulations or if you have not withdrawn your consent under the Privacy in Electronic Communication Regulations.



Legitimate Interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests.

Performance of a Contract: Where we have entered a contract with you, we may process your personal information to fulfil the terms of our contract.

Legal Obligations: We may disclose your information where we are legally required to do so to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

Vital Interests: We may disclose your information where we believe it is necessary to investigate, prevent, or act regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

Vendors, Consultants and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access



to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Services, which will enable them to collect data on our behalf about how you interact with our Services over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content, pages, or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent, or trade any of your information with third parties for their promotional purposes. We have contracts in place with our data processors, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organisation apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.

Third-Party Advertisers. We may use third-party advertising companies to serve ads when you visit or use the Services. These companies may use information about your visits to our Website(s) and other websites that are contained in web cookies and other tracking technologies to provide advertisements about goods and services of interest to you. See our <u>Cookie Policy</u> for further information.



WHO WILL YOUR INFORMATION BE SHARED WITH?

We only share and disclose your information with the following categories of third parties. If we have processed your data based on your consent and you wish to revoke your consent, please contact us using the contact details provided in the section below titled "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?".

- Ad Networks
- · Affiliate Marketing Programs
- Cloud Computing Services
- · Communication & Collaboration Tools
- Data Analytics Services
- Data Storage Service Providers
- Finance & Accounting Tools
- Order Fulfilment Service Provider
- · Payment Processors
- · Performance Monitoring Tools
- Sales & Marketing Tools
- Social Networks
- Website Hosting Service Providers



DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our <u>Cookie Policy</u>.

IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

We may transfer, store, and process your information in countries other than your own.

Some of the servers we use are in the United States. We have implemented measures to protect your personal information, including by using the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and between us and our third-party providers. These clauses require all recipients to protect all personal information that they process originating from the EEA or UK in accordance with European data protection laws and regulations. Our Standard Contractual Clauses can be provided upon request. We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.



HOW LONG DO WE KEEP YOUR INFORMATION?

We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than twenty-four (24) months past the start of any idle period of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

HOW DO WE KEEP YOUR INFORMATION SAFE?

We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties



will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

WHAT ARE YOUR PRIVACY RIGHTS?

Under data protection law, you have rights we need to make you aware of. These are:

Your right of access

You have the right to ask us for copies of the personal information we hold about you at any time.

Your right to rectification

You have the right to ask us to rectify any information we hold about you that 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 from all our systems.

Your right to restriction of processing

You have the right to ask us to restrict the ways in which we process your information.



Your right to object to processing

You have the right to object to processing if we are doing so in our legitimate interests.

Your right to data portability

This only applies to information you have given to us. You have the right to ask that we transfer the information you gave us from one entity to another or give it to you directly. The right only applies if we are processing information based on your consent or under, or in talks about entering a contract and our processing is automated.

To make a request under any of these rights, please contact us by <u>email</u>. We will consider any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are a resident in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.



If you have questions or comments about your privacy rights, please contact us by <u>email</u> or write to us at AFC Wimbledon Limited, Plough Lane Stadium, Plough Lane, London, England, SW17 ONR.

Account Information

If you would at any time like to review or change the information we have for you, change any information in any account you might have with us, or terminate your account, please contact us by <u>email</u>.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms and Conditions and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. To opt-out of interest-based advertising by advertisers on our Services

visit http://www.aboutads.info/choices/. For further information, please see our Cookie Policy.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us by email. You will then be removed from the marketing email list — however, we may still communicate with you, for example to send you service-related emails



that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

DO WE MAKE UPDATES TO THIS NOTICE?

Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.



HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact us by <u>email</u> or write to us at AFC Wimbledon Limited, Plough Lane Stadium, Plough Lane, London, England, SW17 ONR.