**CFC Privacy Policy**

**Introduction**

This website, [**www.chesterfield-fc.co.uk**](https://superchancestaging.co.uk/chesterfieldweb) (“**Site**”) is operated by CFC 2001 Ltd, (company number 4273743), registered at the SMH Group Stadium, 1866 Sheffield Road, Chesterfield, S41 8NZ  (“**Club**”).

The Club are the Data Controllers of personal data collected by us which you provide through the Site, for the purpose of the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679).

References to “**we**”, “**us**” and “**our**” in this Policy are all references to the Club.

Protecting your privacy is very important to us. This privacy policy (“**Policy**”) describes the types of personal data you provide and/or we collect via your use of the Site, what we may do with that personal data and your rights. “Personal data” is defined in the GDPR and is essentially information from which an individual person can be identified. By submitting information and/or continuing to use the Site, you signify your consent to us using your personal data in accordance with the below.

We may need to change the terms of this Policy from time to time and changes will be posted on this page (and/or where appropriate, otherwise notified to you). Your continued use of the Site will be deemed to be acceptance of amendments we make. This Policy was last updated on 1 March 2019.

**How is your personal data collected?**

We use different methods to collect data from and about you including through:

**Direct interactions**

You may give us your Identity, Contact and Financial Data (see How we use your personal data) by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

* Apply for our products or services;
* Create an account on the Site;
* Subscribe to our service or publications;
* Request marketing to be sent to you;
* Enter a competition, promotion or survey; or
* Give us some feedback.

**Automated Technologies or Interactions**

As you interact with the Site, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies.

**Third parties**

We may receive personal data about you from various third parties as set out below:

* Technical Data from Google Analytics based outside the EU; and
* Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Ticketmaster Sport all based inside the EU.

**How we use your personal data**

We request that the information you provide is as accurate as possible as this allows us to secure your privacy by differentiating you from others, and creating a profile for you so that we can provide a personalised service when you visit the Site and/or we send you emails. Periodically we may send you an email asking you to “Update your Details”.

You will be required to provide basic Identity Data to receive information from us. However, the more you tell us about yourself, the more we can tailor our communication to your needs. Use of services accessed through the Site may require you to provide further or specific types of information. In summary, the types of personal data which we may collect, use, store or transfer are grouped together as follows:

* *Identity Data* includes first name, last name, username or similar identifier, title, date of birth.
* *Contact Data* includes billing address, delivery address, email address and telephone numbers.
* *Financial Data* includes bank account and payment card details.
* *Transaction Data* includes details about payments to and from you and other details of products and services you have purchased from us.
* *Technical Data* includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Site.
* *Profile Data* includes your username and password, purchases or orders made by you, preferences, feedback and survey responses.
* *Usage Data* includes information about how you use our website, products and services.
* *Marketing and Communications Data* includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We have set out below, in a table format, 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. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please Contact Us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below:

|  |  |  |
| --- | --- | --- |
| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
| To register you as a new customer | Identity Contact | Performance of a contract with you |
| To process and deliver your order including: Manage payment, fees and charges Collect and recover money owed to us | Identity Contact Financial Transaction Marketing and Communications | Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us) |
| To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy Asking you to leave a review or take a survey | Identity Contact Profile Marketing and Communications | Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |
| To enable you to participate in chat rooms, forums, message boards, and/or news groups on the Site on which you can post information and, where we deem necessary, to respond to any such posts you make Information you post in these areas may become public information and must always comply with our Terms of Use. | Identity Contact Profile Usage Technical Marketing and Communications | Performance of a contract with you Necessary for our legitimate interests (to develop our products/services and grow our business) Necessary to comply with a legal obligation |
| To enable you to partake in a prize draw, competition or complete a survey | Identity Contact Profile Usage Marketing and Communications | Performance of a contract with you Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) |
| To administer and protect our business and the Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | Identity Contact Technical | Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation |
| To carry out market research so that we can improve the products and services we offer. Your feedback is valued and helps to shape the products and services we offer. You will have the right to opt-out of receiving or participating in our surveys at any time | Identity Contact Profile Usage Marketing and Communications Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
| To manage and improve the Site and allow you to use the features offered by the Site. Information we use for this purpose may include (for example) that about your computer and, where available, your IP address, operating system, location and browser type | Technical Usage | Necessary for our legitimate interests (to define types of customers for our products and services, to keep the Site updated and relevant, to develop our business and to inform our marketing strategy) |
| To alert you to other information, including offers and promotions, relating to us, EFL, National League and/or (*except where you have indicated otherwise*) commercial partners. See Marketing Information section of this page. Such information may communications of potential interest from us, our official partners, or EFL, National League official partners | Identity Contact Technical Usage Profile | Necessary for our legitimate interests (to develop our products/services and grow our business) |
| To monitor criminal activity within our stadium and venues or fraudulent financial transactions or activities | Identity (including CCTV footage when amalgamated with other personal data) Contact Financial Profile Transaction Usage Technical | Necessary to comply with a legal obligation |
| To adequately audit and demonstrate processes concerning subject access requests (including erasure requests) | Identity Contact Profile Usage Technical | Necessary to comply with a legal obligation |

We may also supplement the information that you provide with other information that we obtain from our dealings with you or which we receive from other organisations such as our commercial partners.

Apart from our staff (including players), we do not collect any special categories personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

In addition, we reserve the right to perform statistical analysis of user behaviour and characteristics to measure interest in and use of the various areas of the Site and to ascertain the number of users that have visited particular web pages. We may also keep track of what you do with our newsletters when you receive them for trends and statistics and to evaluate the efficiency of our newsletter and information service. We may provide aggregated and anonymised data (not identifying any individual) only from these analyses to third parties.

**Marketing Information**

We do not sell, rent, or otherwise provide personally identifiable information to third-parties without your consent, except only as set out in Disclosure (sharing) your information below.

From time-to-time we, and/or our commercial partners (if you have agreed to receive their information when you provided your personal information) would like to contact you to tell you more about the offers, services, products and other initiatives available to you.

We and/or our commercial partners will only contact you by electronic means if you have consented to this. However, if you are an existing customer (and have not opted out) we may contact you by electronic means about services, products and initiatives similar to those you have previously received or enquired about (unless you have chosen not to receive such electronic communications).

If, at any time after registering, you would like to change your preference and opt-in or opt-out from receiving communications from us or third-parties you can do this at any time by changing your preferences on your personal profile page.

**Cookies**

The Site uses cookies. A cookie is a small file containing an identity code. With your consent, your computer accepts the cookie and stores it. When you next visit the Site, the code is retrieved, allowing an individual visitor or computer to be recognised.

We are not responsible or liable for the content, privacy policies or services offered by websites other than the Site, including those which link from the Site. We encourage you to read and familiarise yourself with the privacy policies, terms and conditions and/or other notices on other websites you visit.

**Children and Young People**

We realise and understand that children and young people under 18 (“**minors**“) may visit the Site, or otherwise interact with us and our commercial partners. It is our policy:

* to encourage all minors to consult with their parents or legal guardian before submitting any content or information to us, our commercial partners or other third parties. Users of the Site, or certain services on it, who indicate they are a minor may be asked to provide a valid email address for their parent or guardian so that we may verify parental consent, where required;
* not to make a minor’s participation in our activity contingent on the child disclosing any more personal information than is reasonably necessary in order to do so. Anyone known to be a minor may be allowed to participate in certain competitions and promotions, but notification of a win or prize will be sent directly to the parent or legal guardian identified in the initial registration process. Publication of a winning minor’s personal details will require parental or legal guardian consent;
* not to actively market to minors; and
* not use (or pass to any third party) personal information on persons known to be minors for any commercial purposes.

Some of the facilities or functions accessible through the Site (including betting facilities advertised or accessed through it) are not intended to be accessible by, nor are they actively advertised to, minors.

Parents or legal guardians should supervise minors when online and we recommend parental control tools be put in place. Any minor using the Site and services offered is confirming that they have received the consent of their parent or a guardian to do so.

**International Transfers**

Some of the organisations to which we may disclose your personal information (including, but not limited to, our commercial partners) may be situated outside of the European Economic Area, in countries which may not have laws that protect privacy rights as extensively as in the United Kingdom, though we will take all reasonable steps to ensure that your information is still properly protected by implementing at least one of the following safeguards:

* We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
* Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
* Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

**Storing and retaining your personal data**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

**Security**

Once your personal data is received we store it as set out in this Policy. We do not store any unnecessary financial information, however if you do provide this we encrypt it for additional security. We cannot guarantee the complete security of our databases, nor that information you supply will not be intercepted while being transmitted to us over the Internet.

If we have given you a password to access certain parts of the Site, you are solely responsible for keeping the password safe and make sure you use a secure browser.

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

**Disclosure (sharing) of your information**

We have already described in the Marketing Information section of this Policy under what circumstances your personal information may be shared with our commercial and official partners, if you have agreed.

In addition, there are some other reasons why we may disclose your personal information to third parties and these are as follows:

* to appoint other organisations to carry out some data processing activities on our behalf. For example, mailing services, payment processing, hosting service providers, and to check your details against the Telephone Preference Service;
* if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about customers will be one of the transferred assets;
* if we are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply our terms of use or terms and conditions of supply of any of the services provided by us (for example our ground regulations) and other agreements; and/or
* to protect the rights, property, or safety of us, our commercial partners, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we share your personal information with third parties we will take reasonable steps to ensure that it is properly protected and processed in accordance with this Policy.

**Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data to:-

* Request access to your personal data
* Request correction of your personal data
* Request erasure of your personal data
* Object to processing of your personal data
* Request restriction of processing your personal data
* Request transfer of your personal data
* Right to withdraw consent

If you wish to exercise any of the rights set out above, please Contact Us and include your name, address, and/or email address to enable us to verify your identity.

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

**Lawful basis**

*Legitimate Interest* means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by Contacting us.

*Performance of Contract* means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

*Comply with a legal or regulatory obligation* means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Your legal rights**

You have the right to:

*Request access* to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

*Request correction* of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

*Request erasure* of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

*Object to processing* of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

*Request restriction* of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

*Request the transfer*of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

*Withdraw consent* at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**Contact Details**

Email address:[fans@chesterfield-fc.co.uk](mailto:fans@chesterfield-fc.co.uk)

Postal address: SMH Group Stadium, 1866 Sheffield Road, Chesterfield, S41 8NZ

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk/)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.