



## Privacy Policy

Privacy and Cookies Policy – Official Hull City and Tiger Leisure Websites

(“Privacy Policy”)

### 1. Introduction

1.1 The Official Hull City website (homepage [www.wearehullcity.co.uk](http://www.wearehullcity.co.uk)) and Tiger Leisure online store (homepage [www.tigerleisure.com](http://www.tigerleisure.com)) are online resources owned and operated by Hull City Tigers Limited. Where this Privacy Policy refers to “the Sites”, they are referring to the Official Hull City website and the Tiger Leisure website (and “Site” shall be construed accordingly).

1.2 We are Hull City Tigers Limited, a limited company registered in England (company number 04032392) whose registered office and address for correspondence is at the MKM Stadium, West Park, Hull, HU3 6HU. References to “we”, “us” and “our” in this policy are all references to Hull City Tigers Limited.

1.3 We are committed to ensuring that all personal data we hold is treated properly and in accordance with applicable data protection legislation. We are registered as a data controller with the Information Commissioner’s Office and our registration number is ZA274325. In accordance with applicable data protection legislation, we are required to explain to you how we will treat any personal data which we collect from you.

1.4 Whenever you submit your information to us in connection with our products and services or your use of either Site, whether it be by using and/or registering to use either Site, by email, over the telephone or by any other means, you acknowledge that we will collect and use such information in accordance with the terms of this Privacy Policy. If you opt in when requested by us, you will also be opting to be added to our mailing list. Please see section 3 below for further information if you no longer wish to receive mailings from us.

1.5 If we change any of the terms of this Privacy Policy we will post the revised policy on each Site behind the “Privacy Policy” link at the bottom of each page.

1.6 Please note that:

(a) information on our use of CCTV, body worn cameras and ANPR technology can be found in our separate CCTV Statement, a copy of which can be accessed by clicking [here](#);

(b) if you are a Member or purchase any commercial package from us (including but not limited to a Premier Tiger membership), we will collect additional information from you in connection with your membership or package (as the case may be). Such information will be processed in accordance with our related data protection statement (please click [here](#) to view our Memberships data protection statement, and [here](#) to view our commercial package data protection statement).

(c) if you apply to us for a Match Card, we will collect additional information from you in connection with your Match Card application and subsequent Match Card usage. Such information will be processed in accordance with our related data protection statement (please click [here](#) to view our Match Card data protection statement).



1.7 You have the right to lodge a complaint with the Information Commissioner's Office ("ICO") if you have any concerns with regard to the way in which we process your personal data. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.8 You warrant that any information you supply to us is accurate and up to date (whether or not the information is about you), that you will inform us if any information that we hold about you requires updating, and that if you submit a third party's details to us (including but not limited to via either Site) you have that third party's permission or an alternative legal justification for doing so. Periodically we may send you an email asking you to update your details.

What information do we collect and how we use it?

2.1 It is possible to visit and browse some sections of the Sites without being required to tell us who you are or reveal any information about you (e.g. if you do not log in to either Site).

2.2 If you wish to register as a user of either Site, you will be required to provide us with your name, email address and postal address. This information will be used by us for our legitimate interests in creating a profile for you and allowing you to access additional Site features when you log in.

2.3 We may collect information from you when you interact with either Site (e.g. completing any information capture forms) or when you correspond with us by phone, email or otherwise. This may include the following kinds of personal data:

- (a) Identity Data – including name, date of birth and gender;
- (b) Contact Data – including billing address, delivery address, email address and telephone numbers;
- (c) Financial Data – including bank account and payment card details;
- (d) Transaction Data – including details about payments to and from you and other details of products and services you have purchased from us; and
- (e) Profile Data – including your username and password, purchases or orders made by you, your interests, contact and marketing preferences, feedback and survey responses.

2.4 We may use the above information about you where necessary for our legitimate interests in the following ways (so long as our interests are not overridden by the impact on you):

- (a) to develop our systems and services and ensure that content from the Sites is presented in the most effective manner for you and your electronic device used to access the Sites;
- (b) to provide you with information or services that you request from us or access via the Sites;
- (c) to monitor your compliance with our Terms of Use;
- (d) to allow you to participate in interactive features of the Sites;
- (e) to notify you about changes or prospective changes to our services and/or either Site;
- (f) to carry out market research so that we can improve the products and services we offer (please note that you have the right to opt-out of receiving or participating in our surveys at any time); and



(g) to create anonymised reports based on your usage of the Site.

2.5 If you purchase any items using the Tiger Leisure website, we will use your identity data, contact data and financial data for the purposes of performing our related contract of sale or supply with you (e.g. to take payment from you in respect of such items and to deliver such items to your selected delivery address).

2.6 If you correspond with us (e.g. using email), we may retain the content of your correspondence together with your contact details and our responses where necessary for our and your legitimate interests in order that we can appropriately manage your relationship with us, to reply to your correspondence and for training and quality purposes. This may include us recording and monitoring our telephone calls with you for such purposes.

2.7 We may also collect information about where you are on the Internet (e.g. the URL you came from, IP address, and domain names like .co.uk and .com), your browser type, the country where your computer is located, the parts of the Sites that were viewed during your visit and any search terms that you entered on either Site. We may collect this information even if you are not a registered user, do not log into either Site or do not submit any information to us using either Site, and will use it for our legitimate interests in administering and improving the Sites, for internal operations (including troubleshooting, analysis of how our website is used, testing, research, statistical and survey purposes) and as part of our efforts to keep the Sites safe and secure.

2.8 Where we need to collect personal data in connection with any services or products which you request or order from us and you fail to provide that data when requested, we may not be able to provide such services or products or perform any related contract that we have or are trying to enter into with you.

#### Match Photography

2.9 Please note that we may also record footage of individuals attending Club home or away matches as part of any image and/or audio-visual recording created by the Club of spectators attending any such match. We may use any such images and recordings for our commercial activities where such use is in our legitimate interests (so long as our interests are not overridden by the impact on you). Such activities may include Club promotional activities and displaying such images on the Official Hull City website in relation to any competition or promotion operated by the Club.

#### News Updates and Marketing Information

3.1 Where you have given us your consent, we may use your identity data and contact data to provide you with Club news updates and to inform you of special offers, promotions, new products and new services via post, telephone, SMS or email. We may also use your information to send you news and other updates by such means in relation to our official sponsors and partners if you give us your consent.

3.2 You may withdraw your consent to us using your information for the purposes mentioned in section 3.1 above at any time. This can be done by e-mailing us at [getintouch@wearehullcity.co.uk](mailto:getintouch@wearehullcity.co.uk), writing to us at Hull City Tigers Limited, the MKM Stadium, Hull, HU3 6HU, clicking on the appropriate link of any of our marketing e-mails or (if you are a registered user) amending your



preferences on your personal profile page on the Sites. Any such withdrawal will not affect the lawfulness of us sending such communications to you before you withdrew your consent.

3.3 Please note that if you withdraw (or do not provide) your consent to us sending you such information, this will mean that you will not be notified by us of any such news or marketing information (such as product discounts and ticket bundles).

#### Children and Young People

4.1 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:

(a) 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 Sites, or certain services on them, 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;

(b) Not to make a minor’s participation in our activity contingent on the minor disclosing any more personal information than is reasonably necessary in order to do so;

(c) Not to actively market to minors; and

(d) Not to use (or pass to any third party) personal information on persons known to be minors for any commercial purposes.

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

4.3 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 will be required to confirm that they have received the consent of their parent or a guardian to do so.

#### Security

5.1 We have put in place appropriate security measures 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 employees, agents, contractors and other third parties who have a business need to know that information. However, the Internet is global and no data transmitted via the Internet can be guaranteed by us to be completely secure during transmission. We cannot guarantee the security of any information that you disclose online and we will not be responsible for any breach of security unless this is due to our negligence or wilful default. It is possible that the information you provide to us will be temporarily transferred via a route outside the European Economic Area as it passes between us.

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

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



5.4 In order to process orders on the Tiger Leisure website as securely as possible we have partnered with Optomany Limited to capture your payments. During this process you will be redirected to a page hosted by Optomany Limited which adheres to the strictest Payment Council (PCI) security standards (PCI-DSS Level 1). Once the payment is completed you will be redirected to the Tiger Leisure website for confirmation. For more information on Optomany Limited please visit [www.optomany.com](http://www.optomany.com).

5.5 No credit card details are held on our servers.

Disclosure (sharing) of your information

6.1 You will be asked before we disclose your personal information to third parties, unless:

(a) they are only processing your information on our behalf in accordance with our instructions. The following activities in particular are carried out by third party processors on our behalf: (some of which include companies in the same group as us such as Superstadium Management Company Limited): ticketing; CCTV monitoring; mailing services; hosting service providers.

(b) they are directly involved in dealing with any request, enquiry, complaint or other correspondence submitted by you;

(c) such disclosure is required by law;

(d) the third party is providing us with professional advice where necessary for our legitimate interests and permitted by law;

(e) the disclosure is in connection with criminal investigations, legal proceedings or prospective legal proceedings where necessary for our related legitimate interests and permitted by law;

(f) the disclosure is necessary for our legitimate interests in establishing, exercising or defending our legal rights and permitted by law (including providing information to others for the purposes of fraud prevention and enforcing our terms of use or ground regulations);

(g) the disclosure is in connection with a proposed sale of any part of our business or assets (in which case we may disclose your personal information to the prospective seller or buyer of such business or assets) or the proposed acquisition of substantially all of our assets by a third party. Any such disclosure will be made where necessary for the legitimate interests of us and/or the third party in respect of the proposed transaction; however, we will not transfer your personal information to any such third party unless we are satisfied that they are able to provide an adequate level of protection in respect of your personal information; or

(h) we have stated or informed you otherwise (e.g. in this Privacy Policy or on either Site).

6.2 Please note that if you purchase or obtain any away match tickets via the Sites (for any competition, including at any neutral venue such as Wembley Stadium):

(a) we may disclose your name, postal address and date of birth to the relevant away team or away venue. This is because we will be acting on behalf of the relevant away team or away venue in supplying the relevant away tickets; and

(b) in such circumstances the relevant away team or away venue will also become a controller of that personal information and will assume corresponding responsibilities under applicable data



protection legislation. Such information will become subject to the relevant away team or away venue's privacy policy (which you should read). We are not liable for the privacy policies or practices of away teams or away venues in respect of your personal information.

6.3 In the event that you provide us with feedback regarding either Site or any of our products and services, we may disclose that feedback to our suppliers and to other users of that Site where it is in our legitimate interests to do so in order to improve that Site and/or the products and services that we provide. This includes any information that you provide to us if you report a problem with either Site.

6.4 Please note that we may use the services of a supplier outside the European Economic Area (EEA) for sending marketing and other email communications (for example SurveyMonkey and MailChimp). This may involve your email address being processed by the relevant supplier on our behalf outside of the EEA. If we do this, we will require the relevant supplier to put in place appropriate technical and organisational data protection security measures (for example, as part of our contract with the relevant supplier or by verifying that they operate under the EU-U.S. Privacy Shield framework (please see [www.privacyshield.gov](http://www.privacyshield.gov) for further details)).

6.5 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 Privacy Policy.

6.6 Except as provided in this Privacy Policy, we will not provide or disclose your information to third parties without your express consent for any purpose (including but not limited to direct marketing). We do not sell personal information under any circumstances.

#### Your rights

7.1 You have a legal right to see a copy of the personal information that we keep about you and to require us to correct any inaccuracies, subject to certain exemptions. In some circumstances you may also have the right to:

- (a) request that we erase any personal information held about you;
- (b) restrict our processing of your personal information (for example, to ask to suspend the processing of personal information to establish its accuracy or the reasons for processing it);
- (c) data portability (i.e. to request the transfer of personal information to a third party); and
- (d) object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party).

7.2 Requests in respect of the above should be made in writing to the Data Compliance Officer, Hull City Tigers Limited, the MKM Stadium, West Park, Hull, HU3 6HU or via email at [dco@wearehullcity.co.uk](mailto:dco@wearehullcity.co.uk). Please contact the same address if you have any reason to believe that information we hold about you is inaccurate. We will respond to your request as soon as possible and, in any event, within one month from the date of receiving the request. Please note that we may, where legally permitted, reject any such request or limit the scope of our response (e.g. if, in the circumstances, the right does not apply to you).



7.3 In accordance with applicable data protection legislation, we follow security procedures in the storage and disclosure of your information. We may therefore request proof of your identity and rights before complying with any request of a nature described in section 7.1 above.

7.4 You will not generally have to pay a fee to exercise any of your rights described in section 7.1 above. However, we may charge a reasonable fee if you make a request to see a copy of your personal information which is clearly unfounded or excessive. Alternatively, we may refuse to comply with your request in such circumstances.

#### Retention and destruction of your personal information

8.1 Any personal information held by us in relation to any of the purposes described in this Privacy Policy will be retained by us for as long as we need it to fulfil the purpose(s) for which it was collected. Further details of our specific retention periods are set out in our information retention policy (a copy of which is available upon request).

8.2 For example, if you have consented to receiving news and marketing communications from us, your preferences in that regard will be retained by us unless and until:

- (a) we cease producing such communications; or
- (b) you withdraw your consent,

following which we will destroy or suppress such personal data without delay so that you no longer receive such communications from us.

8.3 Save for any contact preferences suppressed under section 8.2 above, your information will be securely destroyed at the end of the relevant retention period described or otherwise referred to in this section 8.

8.4 Whilst taking into consideration our legal obligations, we will on an ongoing basis: review the length of time that we retain personal data for; consider the purpose or purposes for which we hold the personal data in deciding whether (and for how long) to retain it for; securely delete personal data that is no longer needed for such purpose or purposes; and update, archive or securely delete information if it goes out of date.

#### 9. Cookies

The Sites use cookies for our legitimate interests in ensuring that you receive the best possible visitor experience. 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 either Site, the code is retrieved, allowing an individual visitor or computer to be recognised. Further information on which cookies we deploy on each Site is available in our Cookie Policy (a copy of which can be accessed by clicking here);

#### 10. How will you know if we make any changes to this Privacy Policy?

We may amend this Privacy Policy from time to time. Any changes we make to this Privacy Policy will become effective from the date of the change. If we make any substantial changes to the way in which we use your personal information collected via either Site or in any of the other circumstances covered by this Privacy Policy, we will notify you (e.g. by sending you an email). You can view the



current version of our Privacy Policy at any time by clicking on the Privacy Policy link on the bottom of any page of either Site.

#### 11. What about third party websites that you can access via the Sites?

11.1 The Sites contain links to other websites which are outside our control and are not covered by this Privacy Policy. If you access other websites using the links provided the operators of those websites may collect personal data from you which will be used in accordance with their respective privacy policies which you should read. We are not liable for the practices of such third party website operators in respect of your personal information.

11.2 You acknowledge that any information that you post using our social media facilities (such as Facebook and Twitter) will be viewable by anybody who visits those facilities and that such information is also subject to the relevant provider's privacy policy. You are advised to consult each such privacy policy to see how they will use your data.

#### 12. Contact

If you have any questions about this Privacy Policy or our treatment of your personal data, please write to us by email to [dco@wearehullcity.co.uk](mailto:dco@wearehullcity.co.uk) or by post to the Data Compliance Officer, Hull City Tigers Limited, the MKM Stadium, West Park, Hull, HU3 6HU.