



# Preston North End FC Privacy Policy

Last updated: 15<sup>th</sup> May 2024

## 1 Introduction

- 1.1 We are The Preston North End Football Club Limited (the "Club", "us" or "our") and we operate the Preston North End Football Club, arrange football matches, manage the stadium facilities and operate a range of supporter services such as ticketing and marketing. We are also responsible for operating a range of services that enable the Club to run efficiently.
- 1.2 We are a company registered in England with company number 00039494 and whose registered offices are at Deepdale, Sir Tom Finney Way, Deepdale, Preston PR1 6RU. We are registered as a data controller with the Information Commissioner in the United Kingdom with registration number Z5913197. This registration covers the uses of personal information set out below.
- 1.3 This privacy notice explains what personal information we collect about you, how we use it, and the steps we take to ensure that it is kept secure. It also explains the rights you have in respect of the personal information we hold about you and how to contact us.
- 1.4 This privacy policy is subject to periodic review. The date at the top of this page reflects when it was last updated. We will notify you by email if we make any substantial changes to this policy.

## 2 What is Personal Information

- 2.1 Personal information is any information which we collect about you that can be used to identify you and is stored either electronically or in a usable filing system.
- 2.2 Personal information will include any information, such as your name and address, that is collected about you by us for any reason, whether it be in connection with the purchase of tickets, marketing or when you contact us.
- 2.3 It also includes any personal information that we collect about you that is in the public domain, such as information made public on social media that is available to us when you connect with us on social media.
- 2.4 It is our intention to provide you with as much information as possible about what we do with your personal information, so that when you provide personal information to us, you do so with an awareness of how it will be used.

## 3 Information we collect and what we do with it

- 3.1 We collect a wide variety of personal information from a wide range of sources in order to run our business activities. In order to provide the services that we are engaged to provide to our customers (such as selling tickets to football matches) we collect, store and use personal information disclosed to us via emails, our website, telephone conversations, and our premises. We aim to only

collect information that is necessary for us to perform our business operations efficiently and effectively.

- 3.2 We will need to collect personal information about you, and there are different ways that we might do so; this privacy notice tells you what to expect when we collect personal information:
- (a) when you visit our website(s);
  - (b) through social media
  - (c) when you contact us;
  - (d) when you purchase tickets (whether online, over the phone or in person);
  - (e) when you apply for a concession;
  - (f) when you attend events on our grounds; and
  - (g) when you subscribe to our marketing and/or when we market to you.

### **3.3 Contacting us**

When you contact us, all communications are handled, reviewed and responded to internally by us.

Please note, however, that:

- (a) email monitoring or blocking software may also be used and that you have a responsibility to ensure that any email you send to us is within the bounds of the law;
- (b) we use Elite Group PLC for our main call system, which provides caller ID services, we will only use this information for the purposes of handling your call and contacting you in relation to the purpose of your call.

As part of communicating with us, you will also submit personal information about you that we require in our legitimate interest. This includes your name, address and additional contact details.

Any personal information that is provided in and during communications is used only for the purpose of reviewing the communications and conducting the ongoing administration and management of communications.

Please note that we may need to contact you by post, email, telephone, SMS and where social media has been used to communicate with the Club, we may respond via the same platform in order to effectively deal with your communication. Please make sure that you keep us updated of any changes or inaccuracies in your contact details.

We will delete all communications that are more than seven years old.

### **3.4 Personal information collected when you purchase tickets**

When you purchase tickets from us, whether online or at our premises, we will need to collect information from you.

When purchasing tickets, we will collect your title, first name and surname, date of birth, address, contact details and payment details. We collect this information about you for contractual necessity in order to complete the transaction. If you do not provide this information, we cannot process the transaction with you. If you are purchasing tickets as a gift for a recipient we will still require all of the above information in order to register the ticket to them.

It is in our legitimate interests to collect your contact details in order to manage and administer your purchase and our relationship with you; for example, we will need to contact you if a match for which you have purchased tickets for has been postponed or cancelled.

We also use this information to undertake marketing activities. Please see **section 3.7** below for more information on our marketing activities.

From time to time we will use an outside call center in order to contact you as a potential customer. Again, this will be done in accordance with **section 3.7** below.

An inactive customer record will be retained for a maximum of seven years. Active records will be kept whilst you're still transacting with us.

Transactional data on all accounts will be retained from 2015 onwards. Season ticket records from 2012/13 and 2013/14 season onwards will be retained within the club's legitimate interests.

### **3.5 Personal information collected when you complete a disability registration form**

In order to process your application, we will need to collect personal information about you. We will collect your name, address, contact details and date of birth. We will also require information related to your disability, condition or illness. Where you provide us with this information, you will have explicitly consented to our use of that information and you will have the right to withdraw consent (explained in **section 5.1**). This information includes the following personal information, which we refer to as **special categories of data**:

- (a) a description of your disability, condition or illness;
- (b) confirmation of whether you have the disability, condition or illness;
- (c) the name, if any, of any organisation that supports you, if the name by itself, would help identify that there is a disability, condition or illness;
- (d) proof of additional support required, if any, due to your disability, condition or illness;

- (e) any other information relating to your disability, condition or illness that you may provide at the request of the Club or that you may decide to provide, in support of your application.

We understand how important special categories of data are, so we will not share the special categories of data for any other purposes other than processing your application and ensuring your safety. Where you require additional support, we may need to share the details of your disability, condition or illness with the ground safety officer who may liaise with the relevant stewards to provide you with support and assistance. We do this to ensure that you are well looked after. Even though you may have a carer with you, we want to make sure that you are always safe when at our premises and we need to be aware of any disability, condition or illness that may require special attention. For example, if there is an evacuation, our stewards will need to know that you are unable to walk down the stairs so that they can help you evacuate safely. We will of course ensure that the information disclosed to the stewards for this purpose is minimised to the maximum extent possible.

We will destroy the special categories of data when your application has expired or if you haven't transacted with us for three years.

### **3.6 Personal information collected when you attend events on our grounds**

We operate CCTV at our stadium which collects data to help us to maintain a safe environment within the stadium during events. We also use the CCTV information for the purposes of security and crime prevention.

TG Baker Limited supply and maintain the CCTV systems at our stadium.

We employ photographers on a contractual basis to take photographs of crowd scenes during matchdays. These are used to promote the Club, in our legitimate interest, on various platforms including but not limited to the local newspaper, social media platforms including the [www.pne.com](http://www.pne.com) website.

We will ensure that there are appropriate safeguards in place with these third party contractors to protect your personal information and to ensure that they abide by this privacy policy.

### **3.7 Our marketing activities**

- 4 When creating an account with us, you will be given a choice to opt in to receive marketing promotional material, updates, reminders and communications by post, email and SMS. If you have not opted out of receiving the marketing communication, we will contact you within our legitimate interests to promote our products and services that are relevant to you or your purchases. **You have the right to object to receiving these communications at any time by contacting us using the details listed in section 7. You also have the opportunity to review and update your marketing preferences, or withdraw your consent on your online account at any time. For full details on how to withdraw consent please see section 5.1.**

All electronic files are stored securely on our club shared folder maintained and hosted by Techn22 our IT system provider. Techn22 in England is a provider of industry standard software solutions.

We will also give you the option to consent to your personal information being shared with the Club's third party partners so that they can market products and services to you that you may be interested in based on your interest in our Club. A full list of the Club's commercial partners are available below and listed on our website at [www.pne.com](http://www.pne.com). We recommend that you review each of the partners' privacy notices.

### **Equality Monitoring Surveys**

The Club is required to collect, analyse and report equality monitoring data in order to fulfil EFL equality, diversity and inclusion requirements, this includes questions relating to gender, age, sexual orientation, trans status, disability, ethnic groups, religion or belief and mental illness and is collected on a bi-annual basis. This data is collected anonymously and therefore, does not relate to an individual - completion of the survey is also purely voluntary.

Equality monitoring survey data is stored securely within and is accessible only to key personnel.

### **Club's commercial partners**

- English Football League (EFL) <https://www.efl.com/efl-website-privacy-policy/>
- Castore - <https://shop.pnefc.net/pages/privacy-policy>
- V12 Finance - <https://www.v12retailfinance.com/privacy-statement>
- Sodexo - <https://uk.sodexo.com/legal-privacy/privacy-policy.html>

### **EFL Partners**

All the EFL's commercial partners and websites can be viewed by clicking here: <https://www.efl.com/-more/efl-commercial-partners/>

We use a third party called Mail Chimp to manage our newsletter subscriptions.

If you ever decide you no longer wish to receive our marketing communications, you can opt out at any time by unsubscribing from the mailing list, using the link provided in the marketing communications email, or by using the contact details in **section 7**. You must also unsubscribe on the ticketing website at [mypne.com](http://mypne.com) by updating your marketing preferences. If you do unsubscribe, please note that we will still keep your email in a separate secure list so that we can make sure that you do not receive our marketing communications again in the future.

#### **4.1 Visiting our website**

We operate two websites, [www.pne.com](http://www.pne.com) which has information on all the latest Club news and <https://www.eticketing.co.uk/pne> is our website for purchasing tickets. Our websites are managed by the English Football League Digital (EFL) and Ticketmaster Sport respectively. As part of the service provided by the EFL Digital and Ticketmaster Sport, they will help to maintain the security and the performance of our website by (i) encrypting data in transit and protecting user connections (ii) using third party scanning services to scan against known web attacks (iii) investigating site errors using third party New Relic and (iv) providing secure hosting services through Microsoft Azure.

The EFL Digital privacy notice can be found at [www.pnefc.net/privacy-policy/](http://www.pnefc.net/privacy-policy/)

The Ticketmaster Sport privacy policy can be found at <https://www.ticketmastersport.com/privacy-policy>

#### 4.1.1 Cookies

Cookies are small files of letters and numbers that we store on your browser or the hard drive of your device. Like most websites, we use cookies on our website for our legitimate interests. There are different types of cookies that we use for different purposes; however generally speaking cookies help us to distinguish you from other users of our website, which allows us to provide you with a better experience and also allows us to improve our website.

You can block cookies at any time by activating the setting on your browser that allows you to refuse some or all cookies. However, if you do block cookies there may be parts of our website that you will be unable to access or that will not function properly.

The cookies that we use for [www.pne.com](http://www.pne.com) can be found by clicking on the following link:

<https://www.pnefc.net/privacy-policy/>

The cookies that we use for <https://www.eticketing.co.uk/pne> can be found here:

<https://www.eticketing.co.uk/pne/Common/CustomerNotice/CookiePolicy>

Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent them.

#### 4.1.2 Third party services

- (a) Whenever you visit our websites, [www.pne.com](http://www.pne.com) and <https://www.eticketing.co.uk/pne>, the website developers EFL Digital and Ticketmaster Sport will use a third party service, Google Analytics on our behalf and for our legitimate interests to collect standard information about your website use, such as internet logs and details of your visitor behaviour patterns. The reason we use this service is so that we can find out how many people visit the website and the various parts of the website. This information helps

us to find out how our websites are working and how to improve them. We do not identify anyone and we do not make or allow Google Analytics to (or attempt to) identify anyone visiting our website.

The privacy policy for Google Analytics can be located using the following link;

<https://policies.google.com/privacy?hl=en>

- (b) We have YouTube video content embedded on our website. YouTube controls any information that is collected by viewing their content.

YouTube's privacy policy can be located at

<https://www.google.co.uk/intl/en-GB/policies/privacy/>.

#### **4.1.3 Turning cookies off**

- (a) You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies. The "Help" function within your browser should tell you how.
- (b) Alternatively you can visit <http://www.attacat.co.uk/resources/cookies/how-to-ban> or [www.allaboutcookies.org](http://www.allaboutcookies.org), which provide general information about cookies and how you can manage cookies on your computer.
- (c) Please be aware that switching off cookies is likely to limit the functionality of our websites.
- (d) It may be that if you have concerns around cookies they in fact relate to so called "spyware". Rather than switching off cookies in your browser you may find that anti-spyware software achieves the same objective by automatically deleting cookies considered to be invasive.

## **4.2 Social Media**

Any information you provide to us via social media (including messaging, "liking", "following" and other communications) is controlled by the relevant social media network.

We recommend that you read their privacy notices and contact them directly if you have any concerns regarding their use of your personal information.

Our website contains links to our social media pages and we currently use:

- 4.2.1 Twitter, whose privacy notice can be found at <https://twitter.com/en/privacy>

- 4.2.2 Facebook, whose privacy notice can be found at <https://en-gb.facebook.com/privacy/explanation>
- 4.2.3 Instagram, whose privacy notice can be found at <https://help.instagram.com/155833707900388>
- 4.2.4 YouTube, whose privacy notice can be found at [https://www.youtube.com/static?template=privacy\\_guidelines](https://www.youtube.com/static?template=privacy_guidelines)
- 4.2.5 Snapchat, whose privacy policy can be found at <https://www.snap.com/en-GB/privacy/privacy-center/>
- 3.9.6 TikTok, whose privacy notice can be found at <https://www.tiktok.com/legal/privacy-policy?lang=en>

## 5 Disclosure of personal information

- 5.1 We will not usually disclose your personal information other than as already explained in **section 2 and 3** above. However, there may be circumstances where we need to share personal information other than as anticipated in **Section 2 and 3** above. These include:
  - 5.1.1 where we are legally required to disclose the information. This includes sharing the personal information with tax authorities and law enforcement agencies for the purposes of the prevention and detection of crime;
  - 5.1.2 where we need to disclose the personal information for the purpose of or in connection with any legal proceedings, or for the purpose of obtaining legal advice, or the disclosure is otherwise necessary for the purposes of establishing, exercising or defending legal rights;
  - 5.1.3 disclosure is required to protect the Club's interests, or someone else's interests (for example, to prevent fraud);
  - 5.1.4 disclosure is necessary in the legitimate interests of a third party for the purposes of crime prevention and the prosecution of offenders (for example, where the police request to view CCTV footage around the time of an incident or crime);
  - 5.1.5 disclosure is necessary to protect your vital interests (for example if you are unwell at our premises, we may need to seek medical assistance;)
  - 5.1.6 it is to a third party for the purposes of providing administrative or processing services on our behalf. If such disclosure is required we will take steps to ensure that the third party protects the personal information in the same way that we do and notify you of any changes to this privacy notice; and
  - 5.1.7 to any prospective purchaser of our business assets or organisation.



4.1.8 where we are required to disclose personal information to the relevant authorities or the police for any safeguarding matters relating to children or adults at risk.

## **6 Your rights**

You have rights in respect of your personal information and this section explains a bit more about those rights that are applicable to you, what we do with your personal information and when you can exercise them. If you would like more information about any of your rights, please contact us on the details set out **section 7**.

### **6.1 Withdrawing consent**

Where you have explicitly consented to us processing special categories of data, you can withdraw consent to our processing the special categories of data at any time during the application process. If you wish to withdraw consent, please do so by sending your request in writing to our contact details in **section 7**.

### **6.2 Accessing your personal information**

We want you to fully understand and be comfortable with how we use your personal information. You can contact us at any time to ask whether we process any personal information about you. If we do hold or use your personal information in any way, you have the right to access that personal information.

#### **All we ask is that:**

- 6.2.1 you make your request to access in writing to the contact details in **section 7**;
- 6.2.2 you verify your identity; and
- 6.2.3 you are fair and reasonable with how often you make this kind of request.

Please allow us up to one month from receipt of your request in order to provide a response.

### **6.3 Requesting more information**

If you have any questions regarding our use of your personal information, we will be happy to answer any questions and provide any additional information that is required. If you do have any specific questions, or need anything explaining, please get in touch via the contact details in **section 7**.

### **6.4 Additional rights**

You also have some additional rights that you may exercise as set out here. We may publish a policy from time to time, to explain how we will handle such requests and what you can expect from us when you make a request to exercise your rights. If we do publish any such policy, we will provide a link to it

here. In each instance we may ask you to make your request in writing to the contact addresses in **section 7** and provide verification of your identity.

- 6.4.1 You have the right to request that we rectify any inaccuracy about you that we may hold, in which case we may ask you to verify the corrected information (for example, we may ask for a recent utility bill for proof of change of address)
- 6.4.2 You have the right to request that we erase your personal information. Please be aware that we can only comply with such a request if
  - (a) your personal information is no longer required for the purposes it was collected for (for example, we need your personal information to respond to a communication);
  - (b) the collection, storage or use of the personal information by us is prevented by law;
  - (c) your personal information is not required for the purposes of establishing, exercising or defending a legal claim such as in the conduct of legal proceedings;
  - (d) we have a necessary overriding legitimate interest in continuing to process your personal information.
- 6.4.3 You have the right to request that we restrict or refrain from processing your personal information:
  - (a) for the time it takes us to verify the accuracy of your personal information where you have disputed its accuracy;
  - (b) where the collection, storage or use of the personal information by us is unlawful but you decide not to ask for erasure;
  - (c) where, we no longer need your personal information but you need them for the purposes of establishing, exercising or defending a legal claim;
  - (d) for the time it takes to determine whether we have an overriding legitimate ground to continue to process your personal information, where you have exercised your right to object to processing.
- 6.4.4 You have the right to data portability in respect of information we have collected from you based on consent or for the reason of entering into a contract. If you exercise this right, we will transfer a copy of the information that you have provided to us at your request.
- 6.4.5 You have the right to object to our use of your personal information:
  - (a) where we are using that information based on our legitimate interests, and where we do not have compelling overriding grounds to continue to use your personal information; or

- (b) at any time, where we use your personal information to send you the newsletter or any other type of direct marketing, in which case it will no longer be used for that purpose, but may use it for another lawful purpose.

## **7 Complaints**

You are important to us, and so is protecting your personal information. We have high standards when it comes to collecting and using personal information. For this reason, we take any complaints we receive from you about our use of your personal information very seriously and request that you bring any issues to our attention.

Where you are communicating with us for the purpose of making a complaint, we will only use your personal information to handle, investigate and respond to the complaint and to check on the level of service we provide. Where the complaint is about a member of our team, we may have to disclose your identity to whoever the complaint is about. You may let us know that you don't want information that identifies you to be disclosed and we will try to respect your request; however, it may not be always possible to handle a complaint on an anonymous basis.

If you are unhappy, you can also contact the Information Commissioner's office to make a complaint directly.

## **8 How to contact us**

Please contact us using the details below if you have any questions or queries in relation to any aspect of this privacy notice:

8.1 Zoë Hall  
Preston North End FC Training Ground  
Euxton Lane  
Euxton  
Chorley  
PR7 6FA  
Email: [zoe@pne.com](mailto:zoe@pne.com)  
Telephone: 0344 856 1964

8.2 Hannah Woodburn  
Ticket Office Manager  
Preston North End FC  
Sir Tom Finney Way  
Deepdale  
Preston  
PR1 6RU  
Email: [hannah@pne.com](mailto:hannah@pne.com)  
Telephone: 0344 856 1966