

## **PRIVACY POLICY**

QPR Holdings Ltd and Queens Park Rangers Football & Athletic club (Club) ("we", "our", "us") take your privacy very seriously.

Protecting your privacy is very important to us. This Privacy Policy ("Policy") describes the types of personal data you provide, how we use and look after the personal information we collect from you, and what we may do with that personal data and your rights. It applies whenever we collect your personal data (including when you use our website or other digital platforms), so please read it carefully.

'Personal data' is defined in the GDPR and is essentially information from which an individual person can be identified. We collect, use, store and transfer some personal data of our members and participants (and their parents or guardians). You provide information about yourself when you register with the Club, and by filling in forms at an event or online, or by corresponding with us by phone, email or otherwise. By submitting information to us and/or continuing to use the Site, you signify your consent to us using your personal data in accordance with the below.

The information you give us may include your name, date of birth, address, e-mail address, phone number, gender, and the contact details of a third party in the case of emergency. We may also ask for relevant health information, which is classed as special category personal data, for the purposes of your health, wellbeing, welfare and safeguarding. Where we hold this data it will be with the explicit consent of the participant or, if applicable, the participant's parent or guardian.

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

QPR Holdings Ltd and the Club is the joint Data Controller of personal data collected by us which you provide through the Site, for the purpose of the General Data Protection Regulations 2018 ("GDPR").

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 31 May 2018.

### **Why we need 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. We will only use personal data for any purpose for which it has been specifically provided.

The only item of personal data that it is obligatory to provide to receive information from us is your email address. However, the more you tell us about yourself, the more we can tailor our communication to your needs. Use of services accessed through the Club's website ("Site") may require you to provide further or specific types of information.

The reason we need participants' and members' personal data is to be able to run the football club and arrange matches; to administer memberships, and provide the membership services you are signing up to when you register with the club. Our lawful basis for processing your personal data is that we have a contractual obligation to you as a participant or member to provide the services you are registering for.

### **How we use your personal data**

We use information about you for five primary purposes:

- I. To perform the services you have requested, such as sending you our newsletters and other information about us. The type of information we may use might include, for example, your name, address, email address, date of birth, telephone number and card or other payment details in relation to goods or services you purchase from us through the Site or otherwise. We will NEVER share your financial information with other third parties for any reason other than processing transactions, fraud and credit risk protection, unless we have your explicit consent.
- II. To enable you to participate in chat rooms, forums, message boards, and/or news groups 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 and Conditions
- III. To alert you to other information, including offers and promotions, relating to us, and/or (except where you have indicated otherwise) commercial partners. See below heading 'Marketing Information' for more information about this. For example, such information may include newsletters, offers, promotions, occasional surveys and other communications of potential interest from us, or QPR In the Community Trust, (company number 06703178) ("QPR Trust") being a charity registered at the same address as the Club.
- IV. 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.

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 and QPR Trust.

### **Legal basis for using your personal data**

<b>Purpose/ Processing Activity</b>	<b>Lawful Basis for processing under GDPR.</b>
processing membership forms and payments/ subs	Performance of a contract
organising matches	Performance of a contract
sending out match or Club information and updates	Performance of a contract
sharing data with coaches, managers or officials to run training sessions or enter events	Performance of a contract
sharing data with leagues we are in membership of, county associations and other competition providers for entry in events	Performance of a contract
sharing data with organisations to provide information about club activities, membership renewals or invitation to social events	The Club has a legitimate interest to maintain member and participant correspondence for club community purposes.
sharing data with third party service or facility providers	The Club has a legitimate interest to run the organisation efficiently and as it sees fit. Provision of some third party services is for the benefit of the Club, participants and its members.

sharing anonymised data with a funding partner as condition of grant funding e.g. Local Authority	The Club has a legitimate interest to run the organisation efficiently and as it sees fit. Application for funding is a purpose that benefits the Club, participants and its members.
publishing match and league results	Consent. We will only publish your personal data in a public domain, including images and names, if you have given your consent for us to do so. In the case of children under the age of 16 then only with written consent of parent/guardian
sending out marketing information such as newsletters and information about promotions, offers from sponsors or other club related information.	Consent. We will only send you direct marketing or other club related information, if you are an existing member, participant or other associated individual and you have not previously objected to this marketing, or, you have actively provided your consent.
To ensure we understand possible health risks	Consent. We will only process details on your medical history with your consent.

### **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 the 'Disclosing (Sharing) Your Information' section 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 user (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, which is accessible from all of our emails.

### **Children and Young People**

We realise and understand that children and young people under 18 ("minors") may interact with us and our commercial partners. It is our policy:

I.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;

II.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;

III.not to actively market to minors; and

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

### **Storing and retaining your personal data**

We are committed to protecting the security of your personal data, which is held in secure data centres in the United Kingdom in accordance with current legislative requirements, industry standards and technology. We will keep the personal data you have provided for as long as we have a relationship with you; once that relationship has ended we will retain it in accordance with this Policy only for as long as we reasonably require and it will then be deleted and destroyed.

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.

### **Security**

Once your personal data is received we store it as set out in this Policy.

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 any information, you are solely responsible for keeping the password safe and make sure you use a secure browser.

### **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 other companies within our corporate group including QPR Holdings Ltd (company number 3197756) registered at Loftus Road Stadium, South Africa Road, London, W12 7PJ and the QPR Trust ;

- 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;

- we may share your personal data with selected third parties, supplier and sub-contractors such as referees, coaches or match organisers. Third-party service providers will only access your personal data for specified purposes and in accordance with our instructions.

- If we or substantially all of our assets are acquired by a third party, in which case personal data held by us about users 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 users, 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.

### **How long we hold your personal data**

We keep personal data on our participants and members while they continue to be a participant or member or are otherwise actively involved with the Club. We will delete this data on 1 June, 3 years after a participant or member has left or otherwise ended their membership or affiliation, or sooner if specifically requested and we are able to do so. We may need to retain some personal data for longer for legal or regulatory purposes.

### **Your rights**

All requests set out in this section or other queries relating to this Policy should be addressed to Data Protection Compliance Officer at Queens Park Rangers Football & Athletic Club Ltd, Loftus Road, South Africa Road, W12 7PJ, London or [privacy@qpr.co.uk](mailto:privacy@qpr.co.uk). Please include your name, address, and/or email address when you contact us.

Access Your Personal Information:

You have the right to see a copy of the information that we hold about you. Any such request should be directed to the Data Protection Compliance Officer at [privacy@qpr.co.uk](mailto:privacy@qpr.co.uk)

Update and Amend Your Personal Information:

You have the right to ask that the information we hold about you is corrected by updating/changing your profile preferences or by contacting us as above. We encourage you to update your personal information promptly if it changes.

Opt-out of Being Contacted:

You have the right to ask that we and/or our commercial partners stop contacting you by clicking the relevant boxes on the screen upon which you provide information or by contacting us.

Close Your Account/Delete Your Personal Information:

You (and any parent/guardian of a minor) have the right to request that we close your account and/or delete your personal information from our database. We will make all reasonable efforts to comply with this request. However, it may not be possible to delete an entry without some delay and without retaining some residual personal information because of backups and records of deletions (including to ensure we no-longer communicate with you) or because we are required to retain personal information for other lawful requirements.

If you are dissatisfied with our response to any of your data privacy concerns you have the right to raise this with the Office of the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (<https://ico.org.uk>) or call 0303 123 1113.