



**CHELTENHAM
TOWN FC**

Privacy Statement

Approved by	Board of Directors
Issue date	January 2019
Review date	January 2022
Contact staff member	Paul Godfrey

Cheltenham Town FC takes your privacy very seriously. This Privacy Notice sets out how we use and look after the personal information we collect from you. We are the data controller, responsible for the processing of any personal data you give us. We take reasonable care to keep your information secure and to prevent any unauthorised access to or use of it.

What personal data we hold on you

Personal data means any information about an individual from which that individual can be identified. We collect, use, store and transfer some personal data of our employees [and their parents or guardians], supporters and customers.

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, e-mail or otherwise.

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.

Why we need your personal data

We will only use personal data for any purpose for which it has been specifically provided. The reason we need personal data is to be able to run the football club, to employ staff, to arrange matches; to administer ticketing, and provide services to our supporters and customers. Our lawful basis for processing your personal data is that we have a contractual obligation to you as an employee, supporter or customer to provide the services you are registering for. 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.

Purpose/processing activity	Lawful basis for processing under Article 6 of the GDPR
Processing season ticket forms and payments/all other forms of ticketing registration and payment	Performance of a contract

Organising matches and club events	Performance of a contract
Handling payroll information and maintaining staff records	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 other events	Performance of a contract
Sharing data with leagues we are in membership of, county associations, the FA and other competition providers	Performance of a contract
Maintaining certain types of sensitive data e.g. CRCs and ethnicity monitoring in order to comply with youth development regulations	Performance of a contract
Sharing data with statutory authorities such as the police e.g. CCTV images	Compliance with legal obligations
Sharing data with staff members to provide information about club activities, matches and other events	The Club has a legitimate interest to maintain supporter and customer 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, employees, supporters and customers.
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 and other match-related data	Consent. We will only publish personal data in a public domain, including images and names, if individuals have given consent for us to do so. In the case of children under the age of 13 then only with written consent of parent/guardian.
Sending out marketing information such as newsletters and information about promotions and offers from sponsors	Consent. We will only send out direct marketing to existing customers, participants or other associated individuals provided they have not previously objected to this marketing, or, they have actively provided your consent.
To ensure we understand possible health risks	Consent. We will only process details on medical history with an individual's consent.

Who we share your personal data with

Information regarding players, academy players and staff may be shared with the Football Association via the Whole Game System database. We also pass your information to the County FA and to leagues to register participants and the team for matches, tournaments or other events, and for affiliation purposes.

We may share your personal data with selected third parties, suppliers and sub-contractors such as government authorities, other football clubs or event organisers. Third-party service providers will only process your personal data for specified purposes and in accordance with our instructions. We may disclose your personal information to third parties to comply with a legal obligation; or to protect the rights, property, or safety of our employees, supporters or customers, or others.

The Club's data processing may require your personal data to be transferred outside of the UK. Where the Club does transfer your personal data overseas it is with the sufficient appropriate safeguards in place to ensure the security of that personal data.

Protection of your personal data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

How long we hold your personal data

We keep personal data on our employees, supporters and customers while they continue to be actively involved with the Club. We will delete this data after a participant has left or otherwise ended their involvement, 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 regarding your personal data

As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data; to restrict or object to certain kinds of processing of your personal data, including direct marketing; to the portability of your personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.

We may update this Privacy Notice from time to time, and will inform you to any changes in how we handle your personal data. There is a separate privacy policy for users of the Cheltenham Town FC website, which can be found at this link: <https://www.ctfc.com/privacy-policy/>

If you have any questions about this Privacy Notice then please contact Paul Godfrey, Director and Club Secretary, Cheltenham Town FC, Whaddon Road, Cheltenham, Glos GL52 5NA.