

## Barnsley FC Academy

### Privacy Policy



#### Introduction

Barnsley FC Academy is committed to protecting our client-base inquirers (including trialists and those seeking trials, agents and football organisations and the wider-public), schoolboy-aged players, scholars, scouts, contracted players' privacy and takes its responsibility regarding the security of personal and sensitive information very seriously. The academy aims to be clear, transparent and accountable about the information that the academy collects through its communication platforms and its use of the information and on how it processes and controls that information.

This Policy relates to the following measures:

What personal data we collect and process about you in connection with your direct or indirect relationship with the academy as a potential user of academy football services and provision and through your use of Barnsley FC website, mobile applications and online services in order to gain extended communication about academy services

Where we collect and types of data source;

How we process that data;

How we store the data;

Who we transfer and/or disclose that data to;

How we deal with your data protection rights;

And how we comply with the data protection regulations;

All personal data is collected and processed in accordance with this policy and third-party associations i.e. The Football Association and English Football League

#### Data Controller

Barnsley FC Academy (referred to as 'we', 'us', 'our' or 'BFC Academy' in this policy) in this policy primarily refers to Barnsley FC 2002 Ltd; the main operating company of Barnsley Football Club, and, where appropriate, across all departments and sectors of the Club is the "data controller" of all personal information that is collected and used for the purposes of football-related activities relevant to Barnsley Football Club, this for the purposes of the Data Protection Act 2018 and the General Data Protection Regulation ['GDPR']. Barnsley Football Club 2002 Ltd is registered in with Companies House - Company number 04573250.

## **Personal Data that we Collect**

BFC Academy receives a plethora of Personal data both formally and voluntarily which in turn means any information relating to you which allows us to identify you, for example, your name, contact details, email addresses, DOB etc.

We may collect personal data from your initial or follow-up inquiry, seek further details from you to establish your status within the professional football industry or gather additional information through third parties i.e. football agencies. You may have also used Barnsley FC social media platforms to communicate with us, which may involve sending personal data.

Particularly, we may collect the following types of information:

- (i) Name, home address, e-mail address, telephone number, passport or other recognised personal ID card numbers and details, including those details that relate to International queries
- (ii) International, National, Regional and County Football Associations and Leagues, which includes your name, nationality, date of birth, gender, passport or ID number, League registration dates and cautions received
- (iii) Completion of Medical questionnaires and screening conditions for players pursuing an interest in BFC Academy (this is considered sensitive data and is covered within our data flow mapping and risk register)
- (iv) Playing and professional history, including information related to your current or previous Clubs and Leagues and associated football agencies
- (v) Information you provide about your family members and legal guardianship for those under the age of 18 years
- (vi) School, college and educational establishment details including educational reports
- (vii) The communications you exchange with us or direct to us via letters, emails, calls, and social media.
- (viii) Your geographic location and travel distances between home and our premises so that we may apply and consider League rulings to certain age groups

### ***Your data may be used for the following purposes:***

- a. Providing you with the information that helps you consider the pathways within the professional academies and football industry
- b. Contacting you in the event that we should pursue our interest in the details that you have provided: we may send you further communications in order to further accelerate our analysis
- c. Football administrative or Football registration purposes: we may use your data for performance analysis; register you with the FA, Premier and/or English Football Leagues; forward or transfer your data to a third party that shares similar professional practices with us; upload your details with football authoritative bodies electronic toolkits for match and playing purposes; Deregistration purposes should you leave the Academy/Club. By providing any personal data you explicitly agree that we may use it to perform the above activities in accordance with this Privacy Policy;

*“For the purpose of the Data Protection Act 2018 and the GDPR the player acknowledges that the Club, the EFL, Premier League, the FA, the PFA and any relevant training body are collecting, sharing and otherwise processing personal data which may include special categories of sensitive personal data (both as defined in the GDPR) about the player including such data in this [contract / form] and using it for all relevant administrative and*

*statistical purposes connected with [Relevant Purpose of Document] and any other purpose as set out in their data protection notices and policies. The EFL's, Premier League and the FA's Player Privacy Notice are available on their respective websites".*

- d. International clearance: we may be obliged to provide your information to International Football Authorities and agencies;
- e. Security and safeguarding; we may pass your information to Club departments and officers so that they are aware of attendances and presence and compliance with football authority legal requirements;
- f. We may use your data to manage our relationship with you as a trialist or registered player so that we're able to share important information such as player and parent reviews, trips and tournaments, and keeping our database up to date.

We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons, for example, the performance of a contract, gaining your consent or legitimate interest within the Elite Player Performance Plan (EPPP).

We may also process your personal data for one or more of the following:

To comply with the legitimate interests of the FA, Premier League and EFL;

- (a) You have consented to us using your personal data (i.e. completing updated EFL registration forms);
- (b) For the purpose of pension administration
- (c) To protect your vital interests or those of another person (e.g. in case of a medical emergency)
- (d) It is in our legitimate interests in operating as a football academy (i.e. for administrative purposes).

We will require parental or legal guardian consent for children under the age of 18 years. Those aged 18+ years can provide their own consent.

For those that continue within the academy Elite Player Performance Plan (EPPP) it is necessary to retain data for 3 years following the closure of a contract and 1 year for trialists that have concluded their trial period. We will not retain your data for longer than it is necessary to fulfil the purpose it is being processed for. When considering and determining the appropriate retention periods, we need to consider the nature of the industry and the contractual matters relevant to the Football Authorities, the purposes for which we process it and whether we can achieve those purposes through other means.

We must also consider periods for which we might need to retain personal data in order to meet our legal obligations, for example, the Football Association may request a specific time period to review documentation relevant to a specific theme or with regard to complaints, queries and to protect our legal rights in the event of a claim being made against the Club.

When we no longer need your personal data, we will securely delete or destroy it. We will also consider if and how we can minimise over time the personal data that we use, and if we can anonymise your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

## **Security of your Personal Data**

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage. The data you provide to us is protected using our IT supplier's technological applications (Arcus Technology).

All payment and invoice details are transmitted within the Purchase Order Master (BFC) across Club infrastructure and stored in compliance with Payment Card Industry Data Security Standards (PCI DSS).

We utilise Core Cloud Systems for sport science testing data which in turn are hosted in secure access-controlled data centres. The GPS data is stored in the PLAYERTEK software system – a cloud based (website) and it provides a complete analytics programme.

The EFL CPS data system is a web-based service capturing Club data including player personal data in an account facilitated through the Club's domain email address with the Club registering with the EFL its nominated users. Both IFAS and MOAS containing Club, player and match details is facilitated via the CPS.

We may disclose your information to trusted third parties for the purposes set out in this Privacy Policy. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with the Data Protection Act 1998 and the new definitions through GDPR 2018 with regard to the law on data protection rules.

## **Data Protection Officer**

The academy has a Data Protection Compliance Manager whom will carry out the principles and duties identified for larger organisations that deploy a Data Protection Officer (DPO). The compliance manager will oversee compliance aligned to this policy. Individuals have the right to make a complaint at any time to a supervisory authority should the need arise.

## **Data Subject Rights & BFC Academy Breaches**

Barnsley Football Club has produced and implemented a Data Subject Rights Policy to ensure that requests from individuals to exercise their lawful rights in relation to personal data processed, transferred or controlled by Barnsley Football Club (inc. academy) or controlled by third parties are appropriately dealt with which in turn deals effectively with such rights.

Barnsley Football Club may request permission with regard to the provision of data from those third-party organisations whom hold such data where a request is received from a registered individual that has had data transferred to the known third party.

Barnsley Football Club has in place a Data Breach Procedure to help frame and log breaches that ranks breaches by severity and impact. Any significant breaches will be reported to the higher authorities.