Privacy Notice

This is the privacy notice of Cardiff City Football Club. In this document, "we", "our", or "us" refers to Cardiff City Football Club.

We are company number 00109065 registered in the United Kingdom.

Our registered office is at Cardiff City Stadium, Leckwith Road, Cardiff, CF11 8AZ

Introduction

- This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information (PII)") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
- 2. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
- 3. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.
- 4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
- 5. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
- 6. The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org

In brief, if you think that we are holding your PII, then you can make a request to us. We will verify the request and if we do, you have a number of rights in relation to that information.

You can ask us for: access to it, to rectify, erase and restrict it, to object to it being processed (used in any way), or to withdraw consent for it to be processed.

We must also tell you the reasons for which we are holding (processing) your PII data, the categories of data that we are holding, how long we plan to hold it and details of any recipients.

In certain circumstances, you can also ask us for a copy of your PII, in machine format, to allow for the transference of the data, to another organisation. Please contact dpo@cardiffcityfc.co.uk by email or by using any of the mechanisms detailed above, if you wish to exercise any of those rights. We have one month to respond to any such request.

Supervisory Authority

If you don't feel that we have responded correctly to any request that you may make of them, regarding your data, you have the right to complain to a Supervisory Authority. In the United Kingdom, the Supervisory Authority is the Information Commissioner's Office. https://ico.org.uk/concerns/ / 0303 123 1113.

1. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

The basis on which we process information about you.

The law requires us to determine under which of six defined terms we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes, then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

1. Information we process because we have a contractual obligation with you

When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- 1.1. verify your identity for security purposes.
- 1.2. sell products to you.
- 1.3. provide you with our services.
- 1.4. provide you with suggestions and advice on products, services and how to obtain the most from using our website.

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to

a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

2. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our Club, including our products and services, you provide your consent to us to process information that may be personal information.

The Club's Preference Centre provides all supporters with the opportunity to define and control communications that they receive from the Club. Once registered, it is possible to log in to the Preference Centre to change or delete any of the information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

If you have given us explicit permission to do so, such as in the Preference Centre options, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us by email at dpo@cardiffcityfc.co.uk or by sending a letter to the Data Protection Officer at the Club. However, if you do so, you may not be able to use our website or our services further.

3. Information we process because we have a legal obligation

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

Specific uses of information you provide to us.

4. Information provided on the understanding that it will be shared with a third party

Our website may allow you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- 4.1. posting a message our forum
- 4.2. tagging an image
- 4.3. clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks.

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at dpo@cardiffcityfc.co.uk

5. Summary of data types and processing

For ease of understanding as to how we may use Personal Identifiable Information (PII), each different aspect is categorized below. Not all fields will be collected in all circumstances as some may be optional.

A) Identity Data

Christian name, surname, Username, club identification number, age, date of birth, gender, marital status

B) Contact Data

Address, delivery address, email account, land and mobile telephone numbers

C) Financial Data

Payment details, Bank and Credit Card payments

D) Transaction Data

Details relating to any transactions between us, goods, services, purchase history etc.

E) Technical Information

IP Address, login and browser details, time zone setting and location, browser plug in types and versions, OS, platform and device details.

F) Usage Data

Aspects of the site visited, pages viewed, products visited etc.

G) Profile Data

Username and password, history of interaction, purchases, etc.

H) Communication and Marketing Data

Preferences in relation to marketing choices in relation to the Club and third parties

Process	Data Type	Lawful basis for processing
Customer registration	(A), (B)	(1) Contract performance
Order completion, delivery	(A), (B), (C), (D), (E)	(1) Contract performance (2) Legitimate interests (Account management)
Account management, general communications, survey participation	(A), (B), (C), (E)	 (1) Contract performance (2) Legitimate interests (Records management, understand customer usage of products/services) (3) Legal obligation
Facilitate opportunity to enter competitions or partake in surveys	(A), (B), (E), (F), (G), (H)	(1) Contract performance (2) Legitimate interests (Understand how supporters/customers utilize our goods and services, development of appropriate offerings for the survival and growth of the Club)
Website, business, and network administration	(A), (B), (C),	(2) Legitimate interests (Business and network, security management and protection) (3) Legal obligation

Ensure the provision of appropriate content and marketing communications and to measure the effectiveness of any such communications	(A), (B), (C), (D), (E), (F), (H)	(2) Legitimate interests (Necessary to develop and grow the Club via the provision of relevant products, services and offerings to our supporters and clients)
Data analysis	(E), (F), (D)	(2) Legitimate interests (Necessary to develop and grow the Club via the provision of relevant products, services and offerings to our supporters and clients)
To provide appropriate goods and services that may be of interest to certain supporters or clients of the Club	(A), (B), (E), (F), (G)	(2) Legitimate interests (Necessary to develop and grow the Club via the provision of relevant products, services and offerings to our supporters and clients)
Re-marketing and third-party marketing	(A), (B), (D), (E), (F), (G)	(2) Legitimate interests (Necessary to develop and grow the Club via the provision of relevant products, services and offerings to our supporters and clients)

6. Complaints regarding content on our website

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

7. Information relating to your method of payment

At the point of payment, you are transferred to a secure page on the website of our Ticketing or Retail Partners. That page may be branded to look like a page on our website, but it is not controlled by us.

The security of your Credit Card data is of paramount importance to us.

Card payment is taken using Optomany managed service. As a member of the Payment Card Industry Security Standards Council (PCI SSC), Optomany is dedicated to ensuring merchants and customers alike are protected against card data fraud. Transaction authorisation, settlement and management with PAYware Ocius is delivered through a PCI DSS Level 1 certified payment processing infrastructure.

Optomany's solution includes tokenisation, which eliminates the need to store sensitive cardholder details by replacing the card details with a unique reference code.

Your credit card details are not held on our servers.

Please ensure that you are in agreement with the terms, conditions, Privacy and Cookie Policies on these payment websites before interacting with any such website or making any purchase.

8. Information about your direct debit

When you agree to set up a direct debit arrangement, the information you give to us is passed to our own bank for processing according to our instructions. We do not keep a copy.

We are registered under the direct debit guarantee scheme. This provides for the customer's bank to refund disputed payments without question, pending further investigation. Direct debits can only be set up for payments to beneficiaries that are approved originators of direct debits. In order to be approved, these beneficiaries are subjected to careful vetting procedures. Once approved, they are required to give indemnity guarantees through their banks.

9. Job application and employment

If you send us information in connection with a job application, we may keep it for up to six months in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. Further detail is contained in our Staff Manual which is only available to employed staff.

10. Sending a message to our support team

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We do not keep any personally identifiable information associated with your message, such as your name or email address.

10. Complaining

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

11. Affiliate and business partner information

This is information given to us by you in your capacity as an affiliate of us or as a business partner.

It allows us to recognise visitors that you have referred to us, and to credit to you commission due for such referrals. It also includes information that allows us to transfer commission to you.

The information is not used for any other purpose.

We undertake to preserve the confidentiality of the information and of the terms of our relationship.

We expect any affiliate or partner to agree to reciprocate this policy.

Use of information we collect through automated systems when you visit our website.

12. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

For further information on how we use cookies, please refer to our cookie policy.

Cookie Policy

13. Pixels

Pixels are graphics that are loaded when a user visits a webpage or opens an email. Tracking pixels have similar functionalities as cookies. The tracks of the user are recorded by a file that is saved in the user's hard drive. Pixels are used to gather useful information about your interactions with our websites or emails allowing us to provide you with a personalised experience and collect statistics about how you use the website so that it can be improved.

We use Pixels to track your interactions in relation to legitimate interest based on your activity on our websites.

14. Marketing

We aim to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established a preference centre where you can view and make certain decisions about your personal data. You can access the centre via a link on every email that we send you or by logging in to your Bluebirds Account.

Third-party marketing

We work with Third Parties to enhance the user experience and ensure you are receiving interest based content from the club.

Social Media Marketing

Meta Customer Audiences

With your consent, we may display interest-based advertisements to you when you are using Facebook through a tool offered by Facebook called the Custom Audience tool.

A Custom Audience is made from a customer list provided by Cardiff City FC to Meta (the company that owns Facebook) and is created to connect with people who have already shown an interest in Cardiff City FC products or services. The customer list is made up of information – called "identifiers" – we've collected about our supporters (such as email, phone number and address). Prior to use, Meta hashes this information (a process which turns the information in the customer list into randomised code). For more information, on hashing please click here and for further information Custom Audiences, please click here. Facebook will not share the hashed data with third parties or other advertisers and will delete the hashed data promptly after the Custom Audience is created.

If you no longer wish to receive any such advertisements through Facebook, you can opt-out by choosing to remove any Cardiff City FC adverts from your Facebook feed.

Facebook pixel

The Facebook pixel is a small piece of JavaScript code that an administrator of a Facebook ad account adds to their website in order to optimise their ads, report on conversions across devices and create Custom Audiences of website visitors to use in Facebook ads. The Facebook pixel was designed from the bottom up with privacy in mind. In order to use this product, the website does not need to collect or send names, email addresses or other contact information to Facebook.

Facebook will never share information from our website with third parties. All information used by Facebook is aggregated with millions of other signals before being read by Facebook's optimisation systems. Facebook uses information obtained from websites that install pixels to improve its ads (as noted in our terms). This data is aggregated before it's used.

The Facebook pixel collects five types of data:

HTTP headers - Anything present in HTTP headers. HTTP headers are a standard web protocol sent between any browser request and any server on the Internet. HTTP headers include IP addresses, information about the web browser, page location, document, referrer and person using the website.

Pixel-specific data - This includes pixel ID and the cookie.

Button click data - This includes any buttons clicked by site visitors, the labels of those buttons and any pages visited as a result of the button clicks.

Optional values - Developers and marketers can optionally choose to send additional information about the visit through custom data events. Example custom data events are conversion value, page type and more.

Form Field Names - This includes website field names such as "email", "address" and "quantity" when a person purchases a product or service. The pixel does not capture field values unless an advertiser includes them as part of advanced matching or optional values.

15. Our use of re-marketing

Re-marketing involves using cookies placed on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website or via other marketing channels when you leave the site.

We use third parties to provide us with re-marketing services which are detailed below. By accessing our websites and completing certain transactions online you have consented to our use of tracking and cookies to improve your online experience and receive important information regarding your interactions with us. You may see advertisements for our products and services on other websites and via other marketing channels as a result of this activity.

Disclosure and sharing of your information.

Fresh Relevance

Fresh Relevance stores information about your account, your orders, and products which interest you. It is used to manage your account and process your orders. Personal data may be used to send triggered emails, such as cart abandonment and purchase confirmation emails. Personal data may be used to personalise marketing, for example to suggest products that are related to your previous shopping. Fresh Relevance encrypts the entire processing of this data via their secure scripts to ensure your information remains secure.

If you no longer wish to receive these types of communications from us, you can opt out via the opt out link provided in the triggered email. This specific opt out will only opt you out of triggered cart abandonment emails and not all email communications from the club.

Meta

With your consent, we may display interest-based advertisements to you when you are using Facebook through a tool offered by Facebook called the Custom Audience tool.

A Custom Audience is made from a customer list provided by Cardiff City FC to Meta (the company that owns Facebook) and is created to connect with people who have already shown an interest in Cardiff City FC products or services. The customer list is made up of information – called "identifiers" – we've collected about our supporters (such as email, phone number and address). Prior to use, Meta https://doi.org/10.1001/journal.org/ (a process which turns the information in the customer list into randomised code). For more information, on hashing please click here">here and for further information Custom Audiences, please click here. Facebook will not share the hashed data with third parties or other advertisers and will delete the hashed data promptly after the Custom Audience is created.

If you no longer wish to receive any such advertisements through Facebook, you can opt-out by choosing to remove any Cardiff City FC adverts from your Facebook feed.

16. Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust

your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting the DPO at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

17. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

18. Information we obtain from third parties.

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

19. Third party advertising on our website

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

20. Credit reference

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

21. Data may be processed outside the European Union

This section does not apply as our websites are hosted in the European Union.

Access to your own information

- 22. Access to your personal information
- 22.1. At any time, you may review or update personally identifiable information that we hold about you, by signing into the Preference Centre.
- 22.2. To obtain a copy of any information that is not provided on our website you may send us a request at dpo@cardiffcityfc.co.uk
- 22.3. After receiving the request, we will tell you when we expect to provide you with the information.
- 23. Removal of your information

If you wish us to remove personally identifiable information from our website, you may contact us at dpo@cardiffcity.co.uk

This may limit the service we can provide to you.

24. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Other matters

25. Use of site by children

We understand that children and young people, including those under 13 years of age ("minors"), may visit the Online Facilities or otherwise interact with us. Minors may need their parent or guardian's permission to use or access certain facilities or receive certain information through the Online Facilities. Minors may also be asked to confirm they have that permission, and we reserve the right to verify parental or guardian consent, where required.

We try not to make a minor's participation in activities with us contingent on the minor disclosing any more personal information than is reasonably necessary in order to do so. We do not actively market to minors or use (or pass to any third party) personal information on persons known to be minors for any commercial purposes, without proper consent.

Other age restrictions may apply to certain products, services or opportunities available.

26. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

- 27. How you can complain
- 27.1. If you are not happy with our privacy policy or if have any complaint, then you should tell us by email. Our address is dpo@cardiffcityfc.co.uk
- 27.2. If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- 27.3. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at https://ico.org.uk/concerns/
- 28. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 28.1. to provide you with the services you have requested;
- 28.2. to comply with other law, including for the period demanded by our tax authorities;
- 28.3. to support a claim or defence in court.
- 29. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

30. Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at dpo@cardiffcityfc.co.uk.