

Bristol City Football Club is committed to protecting and respecting your privacy and personal data.

This policy (together with the website terms of use and the Cookie Policy on our website) sets out the basis on which any personal data collected from you, or that you provide to Bristol City Football Club, will be processed by Bristol Sport Limited (including when you use our website, use any of our other digital platforms, sign up to a newsletter or take part in any of our competitions or promotions). Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

# **ABOUT US**

Bristol City Football Club Limited is a company within the Pula Sport Limited group which also includes Bristol Sport Limited. The data controller of the personal data referred to in this Privacy Policy is Bristol Sport Limited of Ashton Road, Bristol, BS3 2EJ (collectively referred to as 'we', 'us' or 'our') which processes any personal data provided to Bristol City Football Club on its behalf.

We have appointed a Data Protection Officer whom you may contact if you have any questions about this Privacy Policy. Please contact our Data Protection Officer using the details set out below:

Data Protection Officer Bristol Sport Limited Ashton Gate Stadium Ashton Bristol BS3 2EJ

Email: privacy@bristol-sport.co.uk

# INFORMATION WE MAY COLLECT FROM YOU

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store, process and transfer the following different types of personal data about you:

• Information that you provide by filling in forms on our website bcfc.co.uk (our website). This includes information provided at the time of registering to use our website and subscribing to



our newsletters. We may also ask you for information when you enter a competition or promotion on our website or on any of our digital platforms, and when you report a problem with our website/digital platforms.

- Identity data such as your name, username or similar identifier, date of birth, marital status, title and gender.
- Contact data such as your postal address/delivery/billing address, email address and telephone numbers.
- Financial data such as your bank account details and card payment details.
- Transaction data such as details about payments to and from you and other details of products and services you have purchased from us.
- Technical data such as details when you digitally interact with us via our website and other digital channels, details of your visits to our website, resources that you access, traffic data, internet protocol (IP) address you use, your login data, browser type and version, time zone setting and location data, weblogs, browser plug-in type and version, operating system and platform and other technology on the devices you use to access our website, how you have reached our website, your journey through our website (including which links you click on and any searches you made), which videos you have watched, what content you like or share, which advertisements you saw and responded to, which pop up or push notifications you might have seen or responded to, how long you stayed on our website and other website/webpage interaction and communication information.
- Profile data such as your username and password, purchases or orders made by you on our website, your interests and preferences.
- Usage data such as information about how you use our website, products and services.
- Marketing and communications data such as your preferences in receiving marketing from us and our partners and your communication preferences.
- Information from your social media accounts where you have given permission for this to be used (for example posts, pictures and video footage you share on platforms such as Facebook and Twitter).
- If you contact us for any reason, we may keep a record of that correspondence.
- We may also ask you to provide feedback or complete surveys that we use for research purposes, although you do not have to respond to them.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify

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you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

# **HOW WE COLLECT YOUR PERSONAL DATA**

We use different methods to collect personal data from and about you, including through:

- Direct interactions you may give us your identity, contact and financial data by filling in forms and/or by corresponding with us by post, email, over the telephone or otherwise. This includes personal data you provide when you: apply for any products or services we provide (such as season tickets and tickets to any of our events); create an account on our website (or an account on any of our other digital channels); subscribe to any newsletters or the publications we issue; request marketing communications to be sent to you; enter a competition, promotion or survey; and/or give us some feedback. We may also collect information such as your meal preferences if you book hospitality with us and whether you require wheelchair access at any of our premises to help ensure your comfort and safety.
- Technological interactions when you interact with our website and other digital platforms, we may automatically collect technical details about the equipment you use to interact with us, your browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. A link to our Cookie Policy is set out below.
- Financial, contact and transaction data we may collect personal data about you via third parties who provide services to us such as ticketing providers and payment processing organisations.
- Third parties and publicly available resources we may collect personal data about you from various third parties such as analytics providers (for example Google) and publicly available resources. We may also collect personal data about you from relevant sporting bodies.
- We may be provided with information from the police and security services about you if you
  have a criminal conviction, are being investigated or have been charged with a criminal offence
  which may result in you no longer being able to attend an event/match at one of our premises or
  at an away premises where one of our clubs are playing.

# IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products and services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.



# **MONITORING**

We may monitor or record telephone calls for security purposes and to improve the quality of services that we provide to you.

For your safety and security and the safety and security of our staff, CCTV is in operation in all areas of our premises which are open to the public.

#### COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. You can set your browser to refuse all or some browser cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy here <a href="https://www.bristol-sport.co.uk/cookies/">www.bristol-sport.co.uk/cookies/</a>.

# WHERE WE STORE YOUR PERSONAL DATA

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, digital channels and/or any of our products/services, you are responsible for keeping this password secure and confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

# **USES MADE OF YOUR PERSONAL DATA**

We will only use your personal data in accordance with applicable data protection laws. We rely on a number of lawful bases for our use and processing of your personal data namely:



- Where we need to perform any contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where we have obtained freely given, specific and informed consent from you to use your personal data for one or more specific purposes.

In particular, we use personal information held about you in the ways set out below. We have also set out lawful bases we rely on to use your personal data in this way:

- Legitimate interests to ensure that content from our website and our other digital platforms is presented in the most effective manner for you and for your computer/device.
- Consent to provide you with information that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- Legitimate Interests to allow you to participate in interactive features of our service, when you
  choose to do so.
- Performance of a contract to notify you about changes to our products and services, including events/matches.
- Performance of a contract to administer and provide products and services you request or have expressed an interest in.
- Performance of a contract to enable us to administer any offers, competitions and/or promotions which you enter.
- Legitimate interests or Consent to track your activity on our website and digital platforms.
- Performance of a contract to create an individual profile for you to personalise and improve your experience and ease of use of our website, other platforms and our products and services.
- Performance of a contract or legitimate interests or consent to personalise any communications which we may send to you.
- Consent to personalise any marketing communications that you have consented to receive from us we may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by email, post or telephone provided you have given your consent to be contacted in such way by us and/or by selected third parties for marketing purposes. If you do not want us to use your data in this way, or to pass your details on to selected third parties for marketing purposes, please do not tick the relevant box situated on the form on which we collect your data (the registration form). To view a full list of third party

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- partners and sponsors of Bristol Sport that may contact you if you consent to receiving marketing communications please click here.
- Legitimate Interests to monitor security arrangements and to detect and prevent crime and anti-social behaviour at our premises.
- Legitimate Interests to analyse the purchases you have made and other information you provide when you register or interact with us to inform our strategic decisions and improve the effectiveness of our marketing activities.

# DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 as well as to the partners and affiliates listed on our website from time to time.

We may disclose your personal information to third parties as follows:

- If Bristol Sport Limited (or any company within our group) or substantially all of its assets are acquired by a third party, in which case personal data held by Bristol Sport Limited about our customers/supporters of our clubs will be one of the transferred assets and such third party may use your personal data in the same way as set out in this Privacy Policy.
- If we are under a duty to disclose or share your personal data in order to: comply with any legal or regulatory obligation; protect the rights, property, or safety of Bristol Sport Limited (or any company within our group), our customers/supporters of our clubs, or others; assist the police or security services with the prevention and detection of crime (whether at our premises or otherwise). This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and/or otherwise as permitted under applicable law.
- To enforce or apply our terms of use, terms and conditions of sale and other agreements in order to provide our products and services to you or to otherwise fulfil contractual obligations that we have with you, we may need to appoint third party organisations to carry out data processing activities on our behalf and provide your personal data to such third parties (for example, payment processing companies, delivery companies and fraud detection companies). We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
- We may share your personal data with our carefully selected partners and sponsors from time to time but we will only do this where you have consented to receive marketing communications from our partners/sponsors.



- We may share your personal data with relevant sporting bodies and regulators.
- We may share your personal data with HM Revenue & Customs, regulators and other authorities who may require reporting of processing activities in certain circumstances.
- We many transfer your personal data outside the EEA and where this occurs, we ensure a similar degrees of protection is afforded to it by using measures such as standard contractual clauses approved by the European Commission or the ICO to ensure that your personal data is treated by those third parties in a way that is consistent with and respects EU and UK data protection laws. If you require further information about these measures, please contact our Data Protection Officer whose details are set out above. By providing your personal data to us, you agree to the transfer, storing and processing of your personal data outside the EEA.

# **CHILDREN**

If you are under 16, please make sure you have your parent or guardian's consent before you provide us with any personal information. Children under 16 must not provide us with personal information without consent from a parent or guardian.

# **YOUR RIGHTS**

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This
  enables you to receive a copy of the personal data we hold about you and to check that we are
  lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any
  incomplete or inaccurate data we hold about you corrected, though we may need to verify the
  accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below). Please note that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to ask us not to process your personal data for marketing



purposes at any time. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to object to such processing by checking certain boxes on the forms we use to collect your data. If you no longer wish to receive direct marketing from us, simply follow the unsubscribe links in our emails to change your preferences or alternatively (including in relation to any other personal data that we hold about you and to exercise your rights) you can contact our Data Protection Officer with your request whose contact details are set out at the front of this Privacy Policy.

Where you opt out of receiving marketing communications from us, this will not apply to us processing your personal data provided to us as a result of a product/service purchase or other transaction.

- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data if you want us to establish the data's accuracy or the reason for processing it.
- Request the transfer of your personal data to you or to a third party.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

# THIRD-PARTY LINKS

Our website may, from time to time, contain links to third party websites (such as the websites of our partner networks, advertisers and affiliates). If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.



# CHANGES TO OUR PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES TO YOUR PERSONAL DATA

Any changes we may make to our Privacy Policy in the future will be posted on this page. Please check this page from time to time to keep updated with any changes and to see the latest version.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if the personal details which you have provided to us change at any time.

# **CONTACT**

If you have any questions about this Privacy Policy or about your personal data held by us, please contact us. Questions, comments and requests regarding this Privacy Policy or about your personal data held by us should be addressed to privacy@bristol-sport.co.uk or sent to the postal address set out at the front of this Privacy Policy.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues whose address is:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF (www.ico.org.uk)

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.