



## SWINDON TOWN FC PRIVACY POLICY

This privacy policy has been created by Swindon Town FC, it is essential you read and consider the policy properly. The statement includes information on:

- Who we are
- How and why we collect your personal data
- How we use your data
- Who we pass your data onto
- Your rights about your data
- Who to contact if you have any questions in regards to the use of your data

### **Who we are**

Swindon Town FC (hereby after "we" or "us" or "our") collects and gathers information in relation to you as an employee (hereby after "you" or "your") as a Data Controller

### **Types of data collected**

The personal data we collect about you is typically, but not limited to

- Name
- Data of birth
- Home address
- Bank details
- Telephone number
- Personal email address

### **Criminal information**

Where relevant some roles and departments in the company will entail you to have a enhanced DBS check. In which case we collect criminal information in relation to you.

### **How is your data collected**

- 1) Process of information you provide to us

We collect information from you personally during the onboarding process and during your career with us

- 2) Monitoring

Your personal information may be collected though a monitoring manor, such as work emails, and CCTV.

## **Use of your personal information**

### 1) Processing your personal information

The meaning of the term processing in this statement shall include the lawful sharing of your information with third parties. In order to fulfil this we may share your information with the following

- HMRC
- Financial Conduct Authority
- Peoples Pension
- EFL
- FA
- DVLA
- Police

Where any of your personal information is shared with a third party, we shall only permit them to process such information for our required purposes, under specific instruction, and not for their own purposes. We are required to enter into a formal agreement to enable such sharing to take place.

## **How long your personal information will be kept**

Your personal information will only be kept for as long as necessary for us to be able to fulfil the above purposes. Your personal information will be kept on file while you work with the club and then destroyed 6 years after you leave the club.

## **Lawful basis for the processing of your personal information**

### 1) General law basis

We are required to comply with data protection laws when processing your information. We have defined above the general purposes for which we collect and process your personal information. These purposes are justified by lawful processing conditions.

Therefore we will only process your personal information for any one of a combination of the below:

- Where it is necessary to enter into an employment contract or perform obligations of your employment contract
- Where it is necessary to comply with a legal obligation
- Where it is necessary to ensure our own legitimate interests or the legitimate interested of a third party (information will be provided to you)
- Where we need to protect our own vital interests.
- Where it is needed in the public interest provided the task or function has a clear basis in law.

## **Keeping your information secure**

We will ensure the proper safety and security of your personal information and have measures in place to do so. We will use technological and organisational methods to keep your personal information safe. Measures include only disclosing with relevant parties, having password protected databases and locked files. Procedures are in place to deal with security breaches and will be implemented as soon as we become aware to protect your information

## Your rights

Under the UK General Data Protection Regulation, you have a number of important rights free of charge. In summary those rights are:

- Fair processing of information and transparency over how we use your personal information.
- Access to your personal information
- Require us to correct any mistakes in information that we hold
- Require the erasure of personal information concerning you in certain situations
- Object at any time to processing of personal information concerning you for marketing purposes
- Object to decisions being taken by automated means which produce legal effects concerning you
- Otherwise restrict our processing of your personal information in certain circumstances
- Claim compensation for damages caused by our breach of data protection laws
- In any limited circumstance where we rely upon your consent for processing personal information you may withdraw your consent at any time.

For further information on any of these see the guidance on the ICO under individuals rights.

Please forward any queries to CEO via Email.

This privacy was published on 9<sup>th</sup> January 2023 and employees will be made aware of any changes made via email.

Please sign and date a copy to say you have read and understood the policy below and return to CEO or HR

Name:

Date:

Signed and understood: