



- Third-Party Processors: All third-party processors engaged by SWFC are contractually bound to comply with UK GDPR and are subject to appropriate data protection agreements.

## **1. WHO WE ARE AND HOW YOU CAN CONTACT US**

'Sheffield Wednesday FC', 'SWFC' or 'Wednesday' (referred to in this policy as 'we', 'us' or 'our') is a trading name of:

**Sheffield Wednesday Football Club  
Hillsborough Stadium  
Sheffield  
S6 1SW**

SWFC have appointed a Data Protection Officer (DPO), who can be contacted in the following ways should you have any questions or feedback about the way your data is handled:

**Email: [privacy@swfc.co.uk](mailto:privacy@swfc.co.uk)  
Mail: Data Protection Officer  
Letter: Sheffield Wednesday Football Club  
Hillsborough Stadium  
Sheffield  
S6 1SW**

## **WHERE WE COLLECT YOUR PERSONAL INFORMATION**

We may collect personal information about you in the following ways:

### **DATA YOU GIVE TO US:**

- When you make a purchase from our website
- When you talk to us on the telephone or at any of our venues
- When you use our website
- When you send emails or letters to us
- When you take part in our competitions or promotions
- When you sign up to our newsletter or marketing inventory
- When you give us feedback

### **DATA WE COLLECT WHEN YOU BUY PRODUCTS OR USE OUR SERVICES:**

- Payment and transaction data
- Profile and usage data, including data we gather from the devices you use to connect to those services such as computers and mobile phones, using cookies (please see our separate cookies policy) and other internet tracking software



#### DATA FROM THIRD PARTIES WE WORK WITH:

- Social networks
- Public information sources
- Agents working on our behalf

### 3. DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity data - name, title, date of birth of those buying our products or using our services
- Contact data - location, postcode, email address, social media name or telephone numbers
- Transaction data - details of the products and services you have purchased from us, including date and time of booking or purchase and spend in relation to that transaction
- Technical data - internet protocol (IP) address, your log-in data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website
- Profile data - purchases or orders made by you, your interests, preferences, feedback and survey responses, preferences about the use of the services (including whether you are interested in certain events that we offer)
- Usage data - information about how you use our website, products and services
- Marketing and communications data - your preferences in receiving marketing from us and your communication preferences
- Children's data - first name, age
- Image data - videos and photos

We 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 you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any special categories of personal data about you. This includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.



#### 4. HOW WE USE YOUR PERSONAL INFORMATION

We are only allowed to use personal information about you if we have a legal basis to do so, and we are required to tell you what that legal basis is. We have set out in the table below the personal information which we collect from you, how we use it, and the legal ground on which we rely when we use the personal information.

In some circumstances we can use your personal information if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on our legitimate interests, we have set that out in the table below.

| What we use your personal information for                                                                  | What personal information we collect                                                               | Our legal grounds for processing                                                                                                                                          | Our legitimate interests (if applicable)                                        |
|------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|
| To register you as a new customer                                                                          | <ul style="list-style-type: none"><li>• Identity</li><li>• Contact</li></ul>                       | <ul style="list-style-type: none"><li>• Performance of a contract with you</li></ul>                                                                                      |                                                                                 |
| To process and deliver your booking/purchase                                                               | <ul style="list-style-type: none"><li>• Identity</li><li>• Contact</li><li>• Transaction</li></ul> | <ul style="list-style-type: none"><li>• Performance of a contract with you</li><li>• Legitimate interests</li></ul>                                                       |                                                                                 |
| To manage payments or collect and recover money owed to us                                                 | <ul style="list-style-type: none"><li>• Identity</li><li>• Contact</li><li>• Transaction</li></ul> | <ul style="list-style-type: none"><li>• Performance of a contract with you</li><li>• Legitimate interests</li></ul>                                                       | To recover any debts owed to us                                                 |
| To manage our relationship with you, including notifying you about changes to our terms or privacy notices | <ul style="list-style-type: none"><li>• Identity</li><li>• Contact</li><li>• Transaction</li></ul> | <ul style="list-style-type: none"><li>• Performance of a contract with you</li><li>• Legitimate interests</li><li>• Necessary to comply with a legal obligation</li></ul> | To keep our records up to date                                                  |
| To enable you to partake in a prize draw, competition or to complete a survey                              | <ul style="list-style-type: none"><li>• Identity</li><li>• Contact</li><li>• Transaction</li></ul> | <ul style="list-style-type: none"><li>• Performance of a contract with you</li><li>• Legitimate interests</li></ul>                                                       | To study how supporters and customers use our services and to grow our business |



| What we use your personal information for                                                                                                    | What personal information we collect                                                                                                                                  | Our legal grounds for processing                                      | Our legitimate interests (if applicable)                                                                                                                             |
|----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                              |                                                                                                                                                                       | <ul style="list-style-type: none"> <li>Consent</li> </ul>             |                                                                                                                                                                      |
| To administer and protect our business and our website                                                                                       | <ul style="list-style-type: none"> <li>Transaction</li> <li>Technical</li> <li>Usage</li> </ul>                                                                       | <ul style="list-style-type: none"> <li>Legitimate interest</li> </ul> | Running our business, provision of administration and IT services, network security                                                                                  |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | <ul style="list-style-type: none"> <li>Identity</li> <li>Contact</li> <li>Marketing and communications</li> <li>Usage</li> <li>Profile</li> </ul>                     | <ul style="list-style-type: none"> <li>Legitimate Interest</li> </ul> | To study how supporters and customers use our services, to develop them, to grow our business and to inform our marketing strategy                                   |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences                           | <ul style="list-style-type: none"> <li>Technical</li> <li>Usage</li> <li>Profile</li> </ul>                                                                           | <ul style="list-style-type: none"> <li>Legitimate Interest</li> </ul> | To define types of supporters and customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy |
| To make suggestions and recommendations to you about the services that may be of interest to you                                             | <ul style="list-style-type: none"> <li>Identity</li> <li>Contract</li> <li>Marketing and communications</li> <li>Technical</li> <li>Profile</li> <li>Usage</li> </ul> | <ul style="list-style-type: none"> <li>Legitimate Interest</li> </ul> | To develop our services and grow our business                                                                                                                        |
| To ask your child's questions to members of our squad                                                                                        | <ul style="list-style-type: none"> <li>Identity</li> <li>Contact</li> <li>Children's</li> <li>Image</li> </ul>                                                        | <ul style="list-style-type: none"> <li>Consent</li> </ul>             |                                                                                                                                                                      |
| To run families and junior competitions                                                                                                      | <ul style="list-style-type: none"> <li>Children's</li> </ul>                                                                                                          | <ul style="list-style-type: none"> <li>Consent</li> </ul>             |                                                                                                                                                                      |



## **5. WHO WE SHARE YOUR PERSONAL INFORMATION WITH**

In order to provide you with our services and meet our legal obligations, we only share your data with third parties in the following circumstances:

- To fulfil your order
- To verify your identity
- To authorise debit/credit card payments and any other transactions authorised by the supporter or customer
- To manage and maintain the accuracy of your records
- To handle complaints and improve customer service
- To administer marketing on behalf of SWFC
- To maintain up-to-date preferences for the marketing you would like to receive from SWFC
- To meet legal obligations, for example, for the purposes of national security, taxation and criminal investigations,
- If SWFC is acquired by a third party, in which case personal data held by it about its customers, will be one of the transferred assets.

We'll never make your personal data available to anyone outside SWFC for a third party to use for their own marketing purposes without your prior consent.

## **6. THIRD PARTY LINKS**

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice or policy of every website you visit.

## **7. TRANSFERRING YOUR PERSONAL INFORMATION OUTSIDE THE EEA**

The EEA is the European Economic Area, which consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal information outside the EEA, we must tell you as we do not transfer your data outside of the EEA.

## **6. DATA SECURITY**

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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you



and any applicable regulator (including the ICO) of a breach where we are legally required to do so.

## 9. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

After you stop being an active supporter or customer, because you have stopped regularly using our services or buying our products, we may keep your personal information for up to six years for one of the following reasons:

- To respond to any questions or complaints from you
- To maintain our records
- To comply with laws applicable to us

After such time, we will securely delete your personal information. If we receive a bounce back from any of the emails that we send to you on a number of occasions, we will delete your personal information in relation to those emails.

## 10. MARKETING

We may use your personal information to tell you about relevant services and any upcoming offers. We can only use your personal information to send you marketing messages if we have either your consent or a legitimate interest to do so.

You can ask us to stop sending you marketing messages at any time – you just need to contact us or use the opt-out links on any marketing message sent to you.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of purchasing our services or any other transaction between you and us.

## 11. YOUR RIGHTS

You have certain rights which are set out in the law relating to your personal information. The most important rights are set out below.

### **Getting a copy of the information we hold**

You can ask us for a copy of the personal information which we hold about you by writing to the Data Protection Officer (in Section 1).

This is known as a data subject access request. You will not have to pay a fee to access your personal data, unless we believe that your request is clearly unfounded, repetitive or excessive. In such circumstances we can charge a reasonable fee or refuse to comply with your request. We will try to respond to all legitimate requests within one month.

### **Telling us if you want us to stop using your personal information**

You have the right to question any information we hold about you that you think is wrong or incomplete. Please contact the Data Protection Officer if you want to do this and we will take reasonable steps to check its accuracy and, if necessary, correct it.

### **Telling us if you want us to stop using your personal information**

You have the right to:



- Object to our use of your personal information (known as the right to object), or
- Ask us to delete the personal information (known as the right to erasure), or
- Request the restriction of processing.

There may be legal reasons why we need to keep or use your data, which we will tell you if you exercise one of the above rights.

### **Withdrawing consent**

You can withdraw your consent to us using your personal information at any time. If you would like to withdraw your consent to any marketing communications you receive from us, please visit the preference centre, details of which can be found at the base of each email. Please contact the Data Protection Officer if you want to withdraw your consent for all other activities. If you withdraw your consent, we may not be able to provide you with our services.

### **Request a transfer of data**

You may ask us to transfer your personal information to a third party. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

## **12. INFORMATION FOR CHILDREN**

This is a child-friendly explanation of how we use information. You should read it with a parent, guardian or other adult so they can help you understand.

When you:

- Look at our website (including videos and games)
- Contact us.
- Create an account with us.

We collect some information about you (such as your name, or information about the tablet or computer you are using).

We do this because we need to so we can carry on making our apps, website and our other services better. We make sure we use as little personal information as possible and only for as long as we need to. We will only keep your information as long as you need it. You can ask us for a copy of your information, or to correct, erase or stop using it. We will do our utmost to keep your information safe.

For some uses of your personal information, we may ask your permission. If you are aged 13 or over, you can give your permission yourself. If you are aged under 13, we require the consent of your parent or guardian.

You can use certain parts of our websites and apps without providing us with any of your personal information. If you do provide us with your personal information, we will use it as set out on the relevant website or in the relevant app. For example, if you sign up to get the newsletter, we will use your email address to send you the newsletter and news, updates and promotions we think you might like.



We encourage you to talk with your parent/guardian about the information we send to you, and check that they are happy for you to continue to receive this information. If you do not tell us you do not want to receive this information anymore, we will assume you have your parent and/or guardian's consent to continue to receive this information.

You can ask us to stop sending you any emails, SMS communications or other communications at any time. In each message we send you, there will be an 'unsubscribe' option, if you follow these instructions, we will stop sending the messages.

If you are a parent or guardian of a child using [swfc.co.uk](http://swfc.co.uk) or otherwise in contact with us, we recommend that you supervise your child while they are online and check what personal information your child is providing to us.

### **13. MAKING A COMPLAINT**

Please let us know if you are unhappy with how we have used your personal information by contacting the Data Protection Officer (details can be found in section 1).

You also have a right to complain to the Information Commissioner's Office. You can find their contact details at [www.ico.org.uk](http://www.ico.org.uk). We would be grateful for the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.



## DOCUMENT CONTROL

### CHANGES HISTORY

| Version | Date         | Amended by          | Recipients | Purpose                                                                                                                   |
|---------|--------------|---------------------|------------|---------------------------------------------------------------------------------------------------------------------------|
| 1.0     | June 2018    | Laura Ibbotson (HR) | All        | New Policy                                                                                                                |
| 1.1     | January 2023 | David Heiland (DPO) | All        | New DPO and HR Manager. Policy not revised since 2018.                                                                    |
| 1.2     | April 2024   | Robert Johnson (IT) | All        | Updated privacy email recipient to reflect change of DPO                                                                  |
| 1.3     | August 2025  | Robert Johnson (IT) | All        | Added to SWFC privacy promise: Privacy by design and default, DPIAs, Cookie policy, Review Cycle, Third party processors. |

### APPROVALS

This document requires the following approvals.

| Name             | Position | Date Approved | Version |
|------------------|----------|---------------|---------|
| Dejphon Chansiri | Chairman | June 2018     | 1.0     |
| Dejphon Chansiri | Chairman | Feb 2023      | 1.1     |

### DISTRIBUTION

| Name               | Date        | Version |
|--------------------|-------------|---------|
| HR Hub & Website   | Feb 2023    | 1.1     |
| HR Hub and Website | April 2024  | 1.2     |
| HR Hub and Website | August 2025 | 1.3     |