



Club Doncaster Foundation – Privacy Policy

This privacy policy (“**Policy**”) describes the types of personal data collected by the Club Doncaster Foundation through your use of the Club Doncaster Foundation website and what happens to that personal data and your rights.

‘Personal data’ is essentially information from which an individual person can be identified.

The Policy is set out in sections so you can click through to the specific areas you want to know. The detail is in each section, along with a quick read summary where relevant.

Who are we?

Club Doncaster Foundation are a registered charity working with the professional sports clubs to affect positive change in the local community.

References to “**we**”, “**us**” and “**our**” in this Policy are all references to Club Doncaster Foundation.

What does this Policy cover?

This Policy applies to personal data collected by the Club Doncaster Foundation through your use of the Club Doncaster Foundation website.

Where personal data is collected and used for the purposes set out in this Policy, Club Doncaster Foundation are ‘data controllers’ under data protection law applicable in the EU (“**Data Protection Law**”).

You should read this Policy together with any other privacy information which may be provided on specific occasions when personal data about you is collected on the website. That will ensure you are fully aware of how and why we are using your data. This Policy supplements any other notices and is not intended to override them.

What does this Policy NOT cover?



This Policy does NOT apply in relation to any data you provide to the Club Doncaster Foundation through offline scenarios separate from the Online Facilities, such as unrelated telephone enquiries or in person.

Links to Third Party Websites and Services

We are not responsible or liable for the content, privacy notices or services offered by websites or apps other than the Club Doncaster Foundation website. We encourage you to read those notices.

What information do we collect?

We may collect, use, store and transfer different kinds of personal data about you. For the purpose of this Policy we have grouped these together as follows:

- **Identity Data** such as your name(s), username or similar identifier, marital status, title, date of birth, gender and job title (where relevant).
- **Contact Data** such as your address, billing address (where different), email address, preferred language and telephone numbers.
- **Financial Data** such as your bank account, PayPal account and/or payment card details.
- **Transaction Data** such as details about payments to and from you and other details of products or services you have purchased from us (such as NCS).
- **Technical Data** such as your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types versions and statuses, operating system and platform and other technology on the devices you use to access the Club Doncaster Foundation website.

Children's Data

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

Other age restrictions may apply to certain products, services or opportunities available through our Club Doncaster Foundation website.

How do we collect your personal data?

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



- **Direct interactions (Enquiries)** You may give us your Identity, Contact, Financial, Communication and certain Profile Data by filling in forms or by corresponding with us using contact details we provide on the Online Facilities. This includes, amongst other things, personal data you provide when you: sign up to programmes (NCS, Fit Rovers, Schools events) or submit a general enquiry.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
 - Technical & Usage Data from parties such as our analytics providers (including Google), and advertising networks (see below);
 - Identity, Contact, Profile, Financial, Transaction, Usage and Technical Data from providers of technical, payment and delivery services;
 - Identity, Contact, Profile, Usage and/or Technical Data from social media platforms which are publicly available or through which you may log in or interact with the Online Facilities;
 - Identity, Financial and/or Contact Data from data brokers or aggregators, such as those used for any credit reference or similar pre-service vetting facility (if any); and
 - Information from lawfully available sources where relevant to our bringing, defending or assisting in legal action (such as the police, regulators, investigators or publicly available sources).

We may also supplement the information collected with other information that we obtain from our dealings with you or which we receive from other organisations, such as our commercial partners, and group companies.

What do we use your personal data for?

We use information about you for the following purposes:

- **Programmes/services** – to allow you to register interest, or book onto a programme (such as NCS etc.) and this enables us to safely deliver these programmes. Parental consent enables us to have emergency contact information, while young people are away on programme.

Processing your data for this purpose will usually be necessary (i) to perform any contract with you for the relevant service where applicable (ii) to comply with legal obligations where applicable or (iii) otherwise for our legitimate interests in complying with third party requirements which enable us to provide the service(s).

- **Payments and Finance**- to collect payments from you for any paid for products or services, and/or administer any payments which may become due to you. This will usually be necessary (i) to perform any contract with you for the paid for service or (ii) to comply with legal obligations where applicable or (iii) for our legitimate interests in recovering debts due to us.



- **Communications**- to communicate with you where necessary for purposes other than marketing. This will usually be necessary (i) to perform any contract with you for applicable services where relevant (ii) to comply with legal obligations where applicable or (iii) otherwise for our legitimate interests in managing our relationship with you as a customer, improving our service, and/or record keeping.
- **Administer and Protect**- to administer and protect our businesses, the Club Doncaster Foundation website, and rights of ourselves or other associated third parties (including those of other users and partners). This may include routine tasks such as troubleshooting, data analysis, testing, system maintenance and support as well as more formal matters such as bringing, defending or assisting in legal action where necessary. This will usually be necessary (i) for our legitimate interests in running our business and systems in a secure manner, business restructuring, protecting our rights and property (including intellectual property) and preventing or tackling illegal activity or (b) to comply with a legal obligation where applicable.
- **Marketing & Associated Profiling**- to alert you to information about events, surveys, competitions, offers, products, services and other exciting updates relating to us.

We will only do this through email, sms, automated phone calls, where you have agreed, so this is on the basis of your consent. However, if you are an existing customer we may contact you about our products or services similar to those you have previously received or enquired about (unless you have chosen not to receive such communications).

You can change your mind or adjust your preferences any time afterwards by emailing us at admin@clubdoncasterfoundation.co.uk. We may measure the effectiveness of our communications, including Usage Data relating to newsletters and other marketing emails as set out in the “What information do we collect?” section above.

- **Research and analysis** to carry out local research and to enable us to improve the programmes and services we offer. Your feedback is valued and helps to inform our strategy, but you will only be part of this process when you provide consent.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. In some circumstances, this may require your consent.



How do we store your information and for how long?

Location

We are committed to protecting the security of your personal data, which we generally hold in secure data centres in the European Economic Area (EEA).

Duration

We will keep the personal data you have provided only for as long as we reasonably require to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, safeguarding or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means. This is in addition to any applicable legal requirements. Details of any specific retention periods for different aspects of your personal data are available on request by contacting us at richard.poole@clubdoncaster.co.uk

For legal reasons we may have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for up to seven years after they cease being customers— this is particularly for any paid for products or services.

In some circumstances you can ask us to delete your data: see the “What are your rights?” section below for further information.

We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Security

The information that we collate, store, and destroy is governed under the General Data Protection Regulation (GDPR) guidelines 2016, which has replaced the Data Protection Act 1998. We take our duties seriously when respect the trust that is given to use to ensure that the information is used appropriately and responsibly to benefit all parties.

All persons have the right to be forgotten and have their data removed from our systems. All data can be requested to be “forgotten” in writing to the data controller who will ensure that data is removed from all appropriate systems. Please note that certain data is exempted from any release which may



hinder any past, present or future, criminal, statutory or legal investigation.

Should your data be at risk from the loss or external security threat we will notify you in any situation that may expose you to serious risk. In order to minimize this risk we will take appropriate security measures against the information we have stored. This includes cloud based password systems, and shared networks not personal computer spaces, and ensuring that data will only be accessed to appropriately authorized persons via passwords and role examinations.

What are your rights?

Under the Data Protection Laws you may have the following rights in relation to your personal data in certain circumstances:

- **Request Access:** (also known as a "data subject access request"). You can receive a copy of the personal data we hold about you.
- **Request Correction:** You can have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of new data you provide.
- **Request Deletion:** You can ask us to delete or remove personal data in certain circumstances, for example where: there is no good reason for us continuing to process it; you have successfully exercised your right to object to processing (below); or where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.
- **Object to Processing of your personal data:** this applies where: we are relying on a legitimate interest or those of a third party (see the "What do we use your information for?" section above) and you feel our processing on this ground impacts your fundamental rights; or where we are processing your personal data for direct marketing purposes.
- **Request Restriction of Processing:** you can ask us to suspend processing of your personal data where: you want us to establish the data's accuracy; our use of the data is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request Transfer:** you can ask us to provide to you, or a third party of your choice, your personal data in a machine-readable format. This right only applies to automated information which: you initially provided consent for us to use your data (see the "What do we use your information for?" section above); or your provided and we used the information to perform a contract with you (see the "What do we use your information for?" section above).
- **Right to withdraw consent;** This only applies where we are relying on consent to process your personal data (see the "What do we use your information for?" section above). 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.

All requests set out in this section or other queries relating to this Policy should be addressed to Club Doncaster Foundation. Please note we may not always be able to comply with your request due to our legitimate interests or other legal reasons. If applicable, these will be notified to you in response to a relevant request.



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

For security reasons, 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). We may also ask you for further information in relation to your request.

If you have any concerns about how we use your data you also have the right to raise this with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (<https://ico.org.uk>). However we will always try to help with any concerns so ask that you contact us in the first instance.

Will this Policy Change?

We will review our policy and the reasoning for keeping your personal data annually and establish whether we are still entitled to process it. If we decide that we are not entitled to do so we will archive your data securely and destroy after three years, or the relationship is reintroduced.

This Policy was last updated on 17th May 2018.

Who can you contact for further details?

Data Protection Officer, Richard Poole (Richard.poole@clubdoncaster.co.uk)

Keepmoat stadium, Stadium Way, Doncaster, DN4 5JW.

Please include your name, address, and/or email address when you contact us.