

BANBURY UNITED COMMUNITY FOOTBALL CLUB LTD

PRIVACY NOTICE

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

This notice applies to you if you are either:

1. an individual who has registered for membership of the club.
2. an individual or company who sponsors, supports or supplies to the club.
3. an individual player/participant/employee for the club and/or whose details we have collected from you.

References to we, our or us in this privacy notice are to Banbury United Community Football Club Ltd, The Banbury Plant Hire Community Stadium, Station Approach, Banbury OX15 6AL [Registered with the Financial Conduct Authority, under the Co-operative and Community Benefit Societies Act 2014, Registration Number 7135]

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws [as we are not required to do so], but Stephen Barlow, Secretary, has overall responsibility for data protection compliance in our organisation.

Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

When you sign up for membership with us, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- o personal contact details that allows us to contact you directly such as name, title, address, email addresses and telephone numbers;
- o date of birth;
- o gender;
- o membership details including start and end date;
- o bank details you provide so that we can receive payments from you or make payments to to you and details of the financial transactions with you;
- o records of your attendance at any activity hosted by us;
- o images in video and/or photographic form and voice recordings; and
- o any disciplinary and grievance information;

Players/Participants/Employees

If you are a player/participant who has registered his/her interest in participating for the club you may also provide us with or we may obtain the following **additional personal information** from you:

- o identification documents such as passport and identity cards and visas;
- o details of next of kin, family members and emergency contacts;

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that

- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below, we refer to these as the “special category reasons for processing of your personal data”.

We may also collect **criminal records information** from you. For criminal records history, we process it on the basis of legal obligations or based on your explicit consent.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you register for membership.

If you are a player/participant we also may collect personal information about you from other referrals such as from managers or talent scouts.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
All Members To administer your membership you have with us and managing our relationship with you,	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you information which is included within your membership benefits package,	All contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other information we think you might find useful or which you have requested from us	All contact and membership details and marketing preferences	Where we believe we have a legitimate interest to keep you up to date with information about the club
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.

Retention of records	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to queries or complaints. We need to retain records in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
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Sponsors, Supporters, Suppliers

To administer your sponsorship, support, supply you have with us and managing our relationship with you,	All contact and membership details, transaction and payment information, records of your interactions with us	This is necessary to enable us to properly manage and administer your contract or agreement with us.
To send you information which is included within your sponsorship, support, supply benefits package,	All contact and membership details	This is necessary to enable us to properly manage and administer your contract or agreement with us.
To send you other information we think you might find useful or which you have requested from us	All contact and membership details and marketing preferences	Where we believe we have a legitimate interest to keep you up to date with information about the club

To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your contract or agreement.
Retention of records	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to queries or complaints. We need to retain records in order to properly administer and manage your sponsorship, support, supply. We may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

Players/Participants/Employees

To administer your playing membership or employment you have with us and managing our relationship with you,	All contact details, bank details, transaction and payment information, records of your interactions with us	This is necessary to enable us to properly manage and administer your playing membership or employment and any contract with us.
To administer any drug and alcohol testing	Health and medical information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate, to provide appropriate adjustments to our facilities and to monitor and manage sickness absence	Health and medical information	We have a legitimate interest in doing so to provide a safe and accessible environment for you to train and compete. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect including any disciplinary and grievance information.	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective

		management of any disciplinary hearings, appeals and adjudications. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To facilitate movement to/from the club from another club	Contact details	To allow players to move clubs freely within the rules of the competitions we play in
Retention of records	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to queries or complaints. We need to retain records in order to properly administer and manage your sponsorship, support, supply. We may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your position as a member or playing member. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing

consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

1. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you.**
 - To any governing bodies or organisations to which the club affiliates: to allow them to properly administer the sport.
 - Other service providers;
 - Our supply chain partners & sub-contractors, such as couriers, import/export agents, shippers;
 - The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives.
 - Police, law enforcement security services and other statutory agencies: to assist with the investigation and prevention of crime, the protection of national security and safeguarding.

We do not disclose personal information to anyone else except as set out above.

2. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 10 years after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked for us.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

3. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;

- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another organisation; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

4. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

5. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email secretary@banburyunitedfc.co.uk or write to us at Secretary, Banbury United Community Football Club Ltd, Banbury Plant Hire Community Stadium, Station Approach, Banbury OX15 5TA .

Version dated 15 May 2018