

## Privacy Notice

At East Fife F.C, we are committed to protecting and respecting your privacy.

Please read this Privacy Notice, together with any other privacy notice that we may provide to you, as it contains important information about how we collect, manage, use and protect your personal data. This Privacy Notice may also be used in conjunction with other privacy notices that we may provide you with in certain situations.

We may change this Privacy Notice from time to time. Please check this policy frequently to ensure you are aware of the most recent version and the date that it was last updated.

**This policy was last updated in March 2020.**

### **Who are we?**

When we say 'The Club' 'we' or 'us' in this policy, we are referring to East Fife F.C., an unincorporated association.

East Fife F.C is a "data controller" of the personal data that we hold about you. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

### **What information do we collect?**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you. What information we collect will depend on your interactions with us, for example, whether you are a customer, an applicant, a supplier, an individual submitting an enquiry to us or a web site user.

However, we have grouped together the types of information that we may collect from you as follows:

- **Identity Data** including name, gender, date of birth, marital status, occupation, nationality;
- **Contact Data** including home address, business address, email address, phone numbers;
- **Financial Data** including bank account details, payment card details;
- **Transaction Data** including details about payments to and from you;
- **Membership Data** including application information, renewal, information, age, disciplinary information, preferences, feedback and survey responses;

## Special Categories of Personal Data

We may also collect, store and use information about:

- Your health, including any medical conditions or disabilities;
- Your criminal history.

## **How do we collect your information?**

- **Information you give us.** You may give us such information directly by completing forms, corresponding or speaking with us by phone, email, letter, at an event or otherwise, submitting a query, visiting our website, purchasing a product from us, providing us with feedback about a product, requesting that we provide you with services /communications when you apply for a vacancy or when we appoint you as a service provider.
- **Information we collect about you.**
  - When you visit our website and receive e-mails from us we may automatically collect technical information about your equipment, browsing actions and patterns. We collect this by using cookies.
  - Information provided by cookies.
    - Cookies are used to improve your experience while visiting our website. Where applicable this website uses a cookie control system allowing you on your first visit to the website to allow or disallow the use of cookies on your computer/device. This complies with legislation requirements for websites to obtain explicit consent from you before leaving behind or reading files such as cookies on your computer /device.
    - Cookies are small files saved to the user's hard drive that track, save and store information about the user's interactions and usage of the website. This allows our website, through its server, to provide users with a tailored experience.
    - If you wish to prevent the use and saving of cookies from this website on to your computers hard drive you should take necessary steps within your web browser's security settings to block all cookies from our website.

Our website may use tracking software to monitor its visitors to better understand how you use it. This software may be provided by Google Analytics which uses cookies to track visitor usage. The software may save a cookie to the user's hard drive in order to track and monitor engagement and usage of the Website, but will not store, save or collect personal information. You can read Google's privacy policy at <https://www.google.com/policies/privacy/>

- Other cookies may be stored on your hard drive by external vendors when our website uses referral programs, sponsored links or adverts. Such cookies may be used for conversion and referral tracking and typically expire after 30 days, though some may take longer.

If you would like further information about cookies and how they are used, you can visit [www.allaboutcookies.org/](http://www.allaboutcookies.org/)

- When we e-mail you, such e-mails may contain tracking facilities. Activity may be tracked and stored in a database for future analysis and evaluation. Such tracked activity may include but is not restricted to: the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity.

## Information we receive about you from other sources

- o We also work with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.
- o We may receive information if you have provided permission to other organisations to share it with us. Before providing permission to such third party organisations to share your personal data, you should check their privacy notices carefully.
- o We may take information from publicly available sources (where possible) to keep your information up to date, for example, from the Post Office's National Change of Address Database.

## How we might use your information?

We use information held about you in the following ways:

- To consider your application for membership
- To manage and administer our relationship with you
- To provide you with information about our news, events, activities, appeals and services
- To carry out our obligations arising from any contracts entered into between you and us
- For disciplinary purposes
- To respond to your requests
- To improve our level of service
- To notify you about changes to our service and notify you of new services
- For administrative and quality assurance purposes
- For the purposes of the establishment, exercise or defence of legal claims
- To ensure that content from our website is presented in the most effective manner for you and for your computer
- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To allow you to participate in interactive features of our service, when you choose to do so as part of our efforts to keep our site safe and secure
- Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

## Communications with you

We may text or e-mail you to provide you with information about our activities and services supplied by us. You can un-subscribe at any time.

We may occasionally call you to provide you with information about our activities or provide you

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with information about services supplied by us. You may unsubscribe to calls by instructing the person calling you or by contacting us at any time on the details set out in the 'Contact Us' section of this notice.

We may also communicate with you through postal marketing when it is in our legitimate interests to do this and when these interests do not override your rights. Those legitimate interests include providing you with information on our services and other activities and those of other carefully selected organisations. You have the right to contact us at any time and opt-out of receiving postal communications.

### **Profiling**

We may use profiling and screening methods to produce relevant communications and provide you with a better experience.

To do this we may use additional external sources of data to increase and enhance the information we hold about you. This may include obtaining details of changes of address and other contact details.

If you do not wish for your information to be used in this manner, or have any queries about how we use your information, you can contact us on the details provided in the 'Contact us' section of this notice.

### **What is our legal basis for using your information?**

There are a number of lawful reasons for us to process your personal data.

One of these is called 'legitimate interest' and means that we can process your personal data if (i) we have a genuine and legitimate reason; and (ii) are not harming any of your rights and interests.

We will use your personal data for the purposes of the administration of the Club and to give you the most appropriate information and services, to provide you with the best experience when dealing with us and for the purposes set out in the **How we might use your information** section of this notice.

Whenever we process your personal data for our legitimate interests, we will consider and balance any potential impact on you and your rights under data protection law.

Other legal bases that we will rely on include the following:

- If you enter into a contract with us, we may process your personal data in order to fulfil our contract with you.
- If we are providing you with promotional e-mail communications, we will do so with your consent. You can ask us not to send such e-mail communications with you at any time by using the details below in the 'Contact Us' section.
- Where we are required to comply with our legal obligations, or to establish and defend our legal rights, or to prevent and detect crimes such as fraud.

Where we use special categories of personal data, for example, information about your health, we may ask for your consent to such use. However, sometimes, there may be reasons that enable us to use this information without consent, for example, in the establishment, exercise or defence of legal claims.

Sometimes your personal data may be used for statistical purposes, but only in a form that no longer identifies you, or for historical purposes.

### **How long will we hold your information for?**

We will hold your personal data on our systems for as long as is necessary to fulfil the purposes that we collected it for.

By law, we are required to retain certain information for a prescribed period of time. In circumstances where there are no such legal requirements, to determine the appropriate retention period, we will consider the amount, nature and sensitivity of the personal data, the

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potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we are processing your personal data and whether we can achieve those purposes through other means.

Therefore, some information may be kept for more or less time depending on how long we reasonably feel it is required for.

We review our retention periods for personal data on a regular basis.

In some circumstances 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.

If you ask us to delete your information in accordance with your rights set out below, we will retain basic information on a suppression list to record your request and to avoid sending you unwanted materials in the future.

### **Who we might share your information with**

We will NOT sell your personal data to any third parties.

We may share your information with selected third parties including:

- When we use other companies to provide services on our behalf, e.g. answering questions about services, sending mail and emails, and when using auditors or other professional advisors.
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- IT service providers.
- If we run an event in partnership with other named organisations your details may need to be shared. We will be very clear what will happen to your data when you register.

We may disclose your personal information to third parties to:

- Comply with any court order or other legal obligation or when data is requested by our regulators or by government agencies or law enforcement agencies;
- Enforce or apply our terms of use and any other agreements;
- In the establishment, exercise or defence of any legal claims;
- Protect the rights, property, or safety of us, our employees or others. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **International transfers of personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") for the purposes described in this policy. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

If we do this, your personal information will continue to be subject to one or more appropriate safeguards set out in the law, for example we may use model contracts in a form approved by regulators. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

### **If you fail to provide personal data**

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If you do not provide us with all of the personal information that we need, this may affect our ability to offer you membership, products, services or benefits. If this is the case, we will notify you at the time.

### **Your rights**

You have a number of rights. If you would like to exercise any of these rights, please contact us using the details set out below in the 'Contact Us' section. If you exercise any of these rights we may ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal information. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge except in exceptional circumstances.

If you wish to raise a complaint in relation to our processing of your personal data, you can contact the Office Manager at the contact details provided at the end of this privacy notice. You also have the right to lodge a complaint with the data protection regulator, the Information Commissioner's Office, if you have concerns about how we use your personal information. You can contact the Information Commissioner's Office at: <https://ico.org.uk/>

Your rights include:

- Right of access to your personal information. This means you have the right to transparency over how we use your data and to make a subject access request
- Right to request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- Right to request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground;
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- a right to object to (i) processing based on our legitimate interests; (ii) processing of your information for direct marketing purposes; and (iii) automated decision making and profiling;
- a right to request the transfer of your personal information to another party; and
- a right to claim compensation for material or non-material damage caused if we breach the data protection rules.

If you would like to find out more about your rights, you can visit the Information Commissioner's Office website at <https://ico.org.uk/>

### **How you can access and update your information**

We strive to maintain accurate, complete, and relevant personal information for the purposes identified in this privacy statement. If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it. It is important that the personal information we hold about you is accurate and current.

### **Security precautions in place to protect against the loss, misuse or alteration of your information**

We have implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. Details of these measures can be obtained on request but may include secure cloud services and other permission controls.

Third parties should only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Our security measures are regularly reviewed.

### **Contact Us**

If you have any questions regarding this policy or about our privacy practices, wish to exercise any of your rights or wish to make a complaint, please contact the club at:

- Email: [office@eastfife.info](mailto:office@eastfife.info)
- Telephone: 01333 426323
- Post: East Fife F.C., Locality Hub, Bayview Stadium, Harbour View, Methil, Fife, KY8 3RW