



BRADLEY STOKE TOWN FOOTBALL CLUB
Jubilee Centre, Savages Wood Road, Bradley Stoke, Bristol. BS32 8HL

Bradley Stoke Town Club Policies

Privacy policy

Bradley Stoke Town FC committed to the General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union (EU) and the European Economic Area (EEA).

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Bradley Stoke Town FC - Club Privacy Notice

Bradley Stoke Town Football Club take your privacy very seriously.

This Privacy Notice sets out how we use and look after the personal information we collect from you. We are the data controller, responsible for the processing of any personal data you give us. We take reasonable care to keep your information secure and to prevent any unauthorised access to or use of it.

What personal data we hold on you.

Personal data means any information about an individual from which that individual can be identified.

We collect, use, store and transfer some personal data of our participants [and their parents or guardians], and other Club members.

You provide information about yourself when you register with the Club, and by filling in forms at an event or online, or by corresponding with us by phone, e-mail or otherwise.

The information you give us may include your name, date of birth, address, e-mail address, phone number, gender, and the contact details of a third party in the case of emergency. We may also ask for relevant health information, which is classed as special category personal data, for the purposes of your health, wellbeing, welfare and safeguarding. Where we hold this data, it will be with the explicit consent of the participant or, if applicable, the participant's parent or guardian.

Where we need to collect personal data to fulfil Club responsibilities and you do not provide that data, we may not be able honour or administer your membership.



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Why we need your personal data

We will only use personal data for any purpose for which it has been specifically provided.

The reason we need participants' and members' personal data is to be able to run the football club and arrange matches; to administer memberships and provide the membership services you are signing up to when you register with the club. Our lawful basis for processing your personal data is that we have a contractual obligation to you as a participant or member to provide the services you are registering for.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/ Processing Activity

Lawful Basis for processing under Article 6 of the GDPR.

processing membership forms and payments/ subs Performance of a contract

organising matches Performance of a contract

sending out match or Club information and updates

Performance of a contract

sharing data with coaches, managers or officials to run training sessions or enter events

Performance of a contract

sharing data with leagues we are in membership of, county associations and other competition

providers for entry in events Performance of a contract

sharing data with committee members to provide information about club activities, membership renewals or invitation to social events The Club has a legitimate interest to maintain member and participant correspondence for club community purposes.

sharing data with third party service or facility providers The Club has a legitimate interest to run the organisation efficiently and as it sees fit. Provision of some third-party services is for the benefit of the Club, participants and its members.

sharing anonymised data with a funding partner as condition of grant funding e.g. Local Authority.

The Club has a legitimate interest to run the organisation efficiently and as it sees fit. Application for funding is a purpose that benefits the Club, participants and its members.

publishing match and league results Consent. We will only publish your personal data in a public domain, including images and names, if you have given your consent for us to do so. In the case of children under the age of 18 then only with written consent of parent/guardian

sending out marketing information such as newsletters and information about promotions and offers from sponsors Consent. We will only send you direct marketing if you are an existing member,



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participant or other associated individual and you have not previously objected to this marketing, or, you have actively provided your consent.

To ensure we understand possible health risks Consent. We will only process details on your medical history with your consent.

Who we share your personal data with

When you become a member of the Club, your information, if you are a coach or volunteer will be or if you are another participant may be (depending upon which league(s) your team plays in) entered onto the Whole Game System database, which is administered by the FA. We also pass your information to the County FA and to leagues to register participants and the team for matches, tournaments or other events, and for affiliation purposes.

We may share your personal data with selected third parties, suppliers and sub-contractors such as referees, coaches or match organisers. Third-party service providers will only process your personal data for specified purposes and in accordance with our instructions.

We may disclose your personal information to third parties to comply with a legal obligation; or to protect the rights, property, or safety of our participants, members or affiliates, or others.

The Club's data processing may require your personal data to be transferred outside of the UK. Where the Club does transfer your personal data overseas it is with the sufficient appropriate safeguards in place to ensure the security of that personal data.

Protection of your personal data

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.

How long we hold your personal data

We keep personal data on our participants and members while they continue to be a participant or member or are otherwise actively involved with the Club. We will delete this data after a participant or member has left or otherwise ended their membership or affiliation, at the end of the current playing season or sooner if specifically requested and we are able to do so. We may need to retain some personal data for longer for legal or regulatory purposes. The personal data that is stored on The FA Whole Game System is subject to their privacy policy, so we advise you review that policy together with this notice. If you would like your personal data to be deleted from Whole Game System, then please contact them.



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Your rights regarding your personal data

As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data; to restrict or object to certain kinds of processing of your personal data, including direct marketing; to the portability of your personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.

As a data subject you are not obliged to share your personal data with the Club. If you choose not to share your personal data with us we may not be able to register or administer your membership. We may update this Privacy Notice from time to time, and will inform you to any changes in how we handle your personal data.

If you have any questions about this Privacy Notice then please contact the club chairman at bstfc2005@gmail.com

Data policy

Bradley Stoke Town FC Data Protection Policy

1. About this Policy

1.1 Bradley Stoke Town FC are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

1.2 Bradley Stoke Town FC, handle personal data about current, former, and on occasion prospective players and their parents or guardians, employees, volunteers, committee members, other Club members, referees, coaches, managers, contractors, third parties, suppliers, and any other individuals that we communicate with.

1.3 In our official capacity with the FA , Gloucestershire FA and Combined Counties League we may process personal data on our behalf and we will process personal data about you. We recognise the need to treat all personal data in an appropriate and lawful manner, in accordance with the EU General Data Protection Regulation 2016/679 (GDPR).

1.4 Correct and lawful treatment of this data will maintain confidence in the Club and protect the rights of players and any other individuals associated with the Club. This Policy sets out our data protection responsibilities and highlights the obligations of the Club, which means the obligations of our employees, committee, volunteers, members, and any other contractor or legal or natural individual or organisation acting for or on behalf of the Club.

1.5 We are obliged to comply with this policy when processing personal data on behalf of the Club and this policy will help us to understand how to handle personal data.

1.6 The Club Committee will be responsible for ensuring compliance with this Policy. Any



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questions about this Policy or data protection concerns should be referred to the Data Information Officer bstfc2005@gmail.com

1.7 We process employee, volunteer, member, referee, coach, manager, contractor, committee, supplier and third-party personal data for administrative and Club management purposes. Our purpose for holding this personal data is to be able to contact relevant individuals on Club business [or administer the terms of your employment, and our legal basis for processing your personal data in this way is the contractual relationship we have with you. We will keep this data for 6 months after the end of your official relationship with the Club, unless required otherwise by law and / or regulatory requirements. If you do not provide your personal data for this purpose, you will not be able to carry out your role or the obligations of your contract with the club.

1.8 All the key definitions under GDPR can be found [here](#).

2. Data protection principles

2.1 Anyone processing personal data must comply with the enforceable principles of data protection. Personal data must be:

2.1.1 processed lawfully, fairly and in a transparent manner;

2.1.2 collected for only specified, explicit and legitimate purposes;

2.1.3 adequate, relevant and limited to what is necessary for the purpose(s) for which it is processed;

2.1.4 accurate and, where necessary, kept up to date;

2.1.5 kept in a form which permits identification of individuals for no longer than is necessary for the purpose(s) for which it is processed;

2.1.6 processed in a manner that ensures its security by appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage;

2.2 We are responsible for and must be able to demonstrate compliance with the data protection principles listed above.

3. Fair and lawful processing

3.1 This Policy aims to ensure that our data processing is done fairly and without adversely affecting the rights of the individual.

3.2 Lawful processing means data must be processed on one of the legal bases set out in the GDPR. When special category personal data is being processed, additional conditions must be met.



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4. Processing for limited purposes

4.1 The Club collects and processes personal data. This is data we receive directly from an individual and data we may receive from other sources.

4.2 We will only process personal data for the purposes of the Club as instructed by the committee, the County FA or the FA, or as specifically permitted by the GDPR. We will let individuals know what those purposes are when we first collect the data or as soon as possible thereafter.

5. Consent

5.1 One of the lawful bases on which we may be processing data is the individual's consent.

5.2 An individual consents to us processing their personal data if they clearly indicate specific and informed agreement, either by a statement or positive action.

5.3 Individuals must be easily able to withdraw their consent at any time and withdrawal must be promptly honoured. Consents should be refreshed every season.

5.4 Explicit consent is usually required for automated decision-making and for cross-border data transfers, and for processing special category personal data. Where children are involved then the consent must be in writing from parent/guardian

5.5 Where consent is our legal basis for processing, we will need to keep records of when and how this consent was captured.

5.6 Our Privacy Notice sets out the lawful bases on which we process data of our players and members.

6. Notifying individuals

6.1 Where we collect personal data directly from individuals, we will inform them about:

6.1.1 the purpose(s) for which we intend to process that personal data;

6.1.2 the legal basis on which we are processing that personal data;

6.1.3 where that legal basis is a legitimate interest, what that legitimate interest is;

6.1.4 where that legal basis is statutory or contractual, any possible consequences of failing to provide that personal data;

6.1.5 the types of third parties, if any, with which we will share that personal data, including any international data transfers;

6.1.6 their rights as data subjects, and how they can limit our use of their personal data;

6.1.7 the period for which data will be stored and how that period is determined;

6.1.8 any automated decision-making processing of that data and whether the data may be



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used for any further processing, and what that further processing is.

6.2 If we receive personal data about an individual from other sources, we will provide the above information as soon as possible and let them know the source we received their personal data from;

6.3 We will also inform those whose personal data we process that we, the Club are the data controller in regard to that data, and which individual(s) in the Club are responsible for data protection.

7. Adequate, relevant and non-excessive processing

7.1 We will only collect personal data that is required for the specific purpose notified to the individual.

7.2 You may only process personal data if required to do so in your official capacity with the Club. You cannot process personal data for any reason unrelated to your duties.

7.3 The Club must ensure that when personal data is no longer needed for specified purposes, it is deleted or anonymised.

8. Accurate data

We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of collection and at the start of each season. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

9. Timely processing

We will not keep personal data longer than is necessary for the purpose(s) for which they were collected. We will take all reasonable steps to destroy or delete data which is no longer required, as per our Privacy Notice.

10. Processing in line with data subjects' rights

10.1 As data subjects, all individuals have the right to:

10.1.1 be informed of what personal data is being processed;

10.1.2 request access to any data held about them by a data controller;

10.1.3 object to processing of their data for direct-marketing purposes (including profiling);

10.1.4 ask to have inaccurate or incomplete data rectified;

10.1.5 be forgotten (deletion or removal of personal data);

10.1.6 restrict processing;

10.1.7 data portability;

10.1.8 not be subject to a decision which is based on automated processing.



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10.2 The Club is aware that not all individuals' rights are absolute, and any requests regarding the above should be immediately reported to the committee, and if applicable escalated to the Gloucestershire County FA/ FA for guidance.

11. Data security

11.1 We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

11.2 We have proportionate procedures and technology to maintain the security of all personal data.

11.3 Personal data will only be transferred to another party to process on our behalf (a data processor) where we have a GDPR-compliant written contract in place with that data processor.

11.4 We will maintain data security by protecting the confidentiality, integrity and availability of the personal data.

11.5 Our security procedures include:

11.5.1 Cupboards should be locked if they hold personal data or club items.

11.5.2 Methods of disposal. Paper documents should be shredded. Digital storage devices should be physically destroyed.

11.5.3 Personal Devices. Anyone accessing or processing Club's personal data on their own device, must have and operate a password only access or similar lock function, and should have appropriate anti-virus protection. These devices must have the Clubs' personal data removed prior to being replaced by a new device or prior to such individual ceasing to work with or support the Club.

12. Disclosure and sharing of personal information

12.1 We share personal data with Gloucestershire County FA, The FA, and with applicable leagues using Whole Game System.

12.2 We may share personal data with third parties or suppliers for the services they provide and instruct them to process our personal data on our behalf as data processors. Where we share data with third parties, we will ensure we have a compliant written contract in place incorporating the minimum data processor terms as set out in the GDPR, which may be in the form of a supplier's terms of service.

12.3 We may share personal data we hold if we are under a duty to disclose or share an individual's personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the individual or other agreements; or to protect our rights,



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property, or safety of our employees, players, other individuals associated with the Club or others.

13. Transferring personal data to a country outside the EEA

We may transfer any personal data we hold to a country outside the European Economic Area (EEA), provided that one of the appropriate safeguards applies.

14. Reporting a personal data breach

14.1 In the case of a breach of personal data, we may need to notify the applicable regulatory body and the individual.

14.2 If you know or suspect that a personal data breach has occurred, inform a member of the committee immediately, who may need to escalate to Gloucestershire County FA or The FA as appropriate. You should preserve all evidence relating to a potential personal data breach.

15. Dealing with subject access requests

15.1 Individuals may make a formal request for information we hold about them. Anyone who receives such a request should forward it to the board/committee immediately, and where necessary escalated to Gloucestershire County FA or The FA for guidance. Nobody should feel bullied or pressured into disclosing personal information.

15.2 When receiving telephone enquiries, we will only disclose personal data if we have checked the caller's identity to make sure they are entitled to it.

16. Accountability

16.1 The Club will implement appropriate technical and organisational measures to look after personal data, and is responsible for, and must be able to demonstrate compliance with the data protection principles.

16.2 The Club must have adequate resources and controls in place to ensure and to document GDPR compliance, such as:

16.2.1 providing fair processing notice to individuals at all points of data capture;

16.2.2 training committee and volunteers on the GDPR, and this Data Protection Policy; and

16.2.3 reviewing the privacy measures implemented by the Club.



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17. **Changes to this policy**

We reserve the right to change this policy at any time. Where appropriate, we will notify you by email.