



**SWANSEA CITY ASSOCIATION FOOTBALL
CLUB LIMITED**

PRIVACY POLICY

Document History

Document Location

This document can be accessed from the following location:

HR Intranet (Kronos) – Employees

www.swansecity.com - Public

Revision History

The latest revision can be found at the top of the list

Revision Date	Author	Version	Summary of Changes
20 th April 2018	Rebeca Storer	V1.4	Custom Audiences
9 th April 2018	Rebeca Storer	V1.3	Changes to Child's Consent
27 th March 2018	Rebeca Storer	V1.2	Further amendments
December 2017	Rebeca Storer	V1.1	Second Draft
September 2017	Rebeca Storer	V1.0	First Draft

Approvals

This document requires the following approvals:

Name	Version	Date of Approval	Signature
Gareth Davies	V1.4	21 May 2018	<i>G Davies</i>

Privacy Policy

In this Privacy Policy, any use of the words “you”, “yours” or similar expressions shall mean any user of our website and digital platforms whatsoever. Terms such as “we”, “us”, “our” or similar expressions shall mean Swansea City Association Football Club Limited.

Your privacy is of the highest importance to us, and we promise not to release your personal details to any outside company for their mailing or marketing purposes.

This Privacy Policy explains what information we collect about you, how we may use it and the steps we will take to ensure it is kept secure.

Please read the following carefully.

Controllers of Information

Any personal information provided to or gathered by www.swanseacity.com is controlled by us. Details of our Data Protection Officer can be obtained by emailing dpo@swanseacity.com or write to us at the following address:

Data Protection Officer
Swansea City Association Football Club Limited
Liberty Stadium
Swansea
SA1 2FA

The information we collect and how we will use your information

All personal information that we collect about you is recorded, used and protected by us in accordance with data protection legislation and our data protection framework. We will always ask for your consent before we communicate with you.

When we provide you with products or services we may collect and store any personal information you provide to us, for example, your name, address, email address, payment details. We may also record details of any disability or health needs you may have at the time of booking an event to help ensure your comfort and safety and improve our future services.

When you create an online account, register to receive marketing communications from us (and/or our sponsors and partners), enter one of our competitions, fill in one of our forms (whether online or offline) or otherwise expressly provide us with your personal information, we may collect and store any personal information that you provide to us and may use it to personalise and improve your experience on our digital platforms, provide products and services you request from us, and carry out profiling and market research.

However, your personal information is used in the following ways:

- to administer and provide products and services you request or have expressed an interest in,
- to enable us to administer any competitions or other offers/promotions which you enter into,
- to communicate with you in the event that any products or services you have requested are unavailable,

- for fraud screening and prevention purposes,
- for record keeping purposes,
- to carry out market research so that we can improve the products and services we offer,
- to track your activity on our digital platforms,
- to create an individual profile for you so that we can understand and respect your preferences,
- to personalise and improve your experience on our digital platforms,
- to personalise and/ tailor any communications that we may send you,
- for profiling purposes to enable us to personalise and/or tailor any marketing communications that you may consent to receive from us.

When you interact with our digital platforms, we will ordinarily collect information about your visit. This is to help us understand how our fans use our digital platforms to enable us to create better content and more relevant communication.

We will collect information on:

- how you have reached our digital platforms and the internet protocol (IP) addresses you have used,
- your browser type, versions and plug-ins and your operating system,
- your journey through our digital platform, link clicks, searches made, the time spent on the page and any other interactions.
- the videos watched
- the liked or shared content
- the adverts followed
- your subscription status
- forms completed

Your country of location may be ascertained from the IP address you have used and we may analyse which marketing activity led to specific actions being taken e.g. app downloads

Custom Audience

We also participate in Facebook's 'Custom Audience' service from time to time. This service enables the Club to display to you personalised advertisements when you visit Facebook's social media platforms. It works by converting your email address to a unique number that Facebook uses to match to unique numbers that Facebook generates from email addresses of its users. Where we use Facebook Custom Audiences, we will only include you if you have consented to receive marketing from us. If you have given us your consent, you can change your mind at any time by unsubscribing or by adjusting your preferences in the preference centre

Consent

We will not contact you unless you have given your express consent for us to do so. You will be given options to opt-in to receive communications from us or third parties via us.

Swans Direct / Club Shop Website

When you make a purchase from our Club Shop Website, we do collect certain personal information from you (for example: your name, email address, payment address and details). All such information is held on secure servers. We comply fully with all applicable Data Protection and consumer legislation, and we will treat all your personal information as fully confidential.

In order to serve you most efficiently, reputable third-party banking institutions handle our credit card transactions. They receive the information needed to verify and authorise your payment card before we process your order. All such institutions are under strict obligation to keep your personal information private.

Disclosure of your information

The information you submit to us will be held in accordance with our responsibilities under the General Data Protection Regulations. As a consequence, we will not disclose your personal information to any third party other than:

- As required as a matter of law;
- In the reasonable enforcement of our contractual rights, terms of use or terms and conditions of sale;
- Lawfully assist the police or security services with the prevention and detection of crime or terrorist activity;
- Where such disclosure is necessary to protect the safety or security of any persons;
- To identify or resolve technical problems arising from the use of our website;
- To deal with complaints from any party regarding the operation of our website;
- As otherwise set out in this Privacy Policy or in those parts of the website where we collect your personal details.

Security of information

Data stored on our website will be stored in a secure manner and we shall use reasonable endeavours to ensure that any such data cannot be accessed by unauthorised third parties.

When you submit payment details to use, we use Secure Sockets Layer (SSL) encryption technology to protect your information.

Any information held on paper is stored securely and electronic information is stored on an encrypted cloud database which can only be accessed by authorised members of staff.

Where we have given you or you have chosen a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential.

Children and Privacy

It is important to us that children can enjoy our website in a responsible fashion. We encourage parents and guardians to supervise their children's online activities by, for example, adopting parental control tools available from online services and software developers to help provide a child-friendly online environment. These tools can also prevent

children from disclosing online their name, address, and other personal information without parental permission.

Your child's privacy is important to us. We are committed to safeguarding children's personal information collected online, and to helping parents and guardians and their children learn how to exercise control over personal information while exploring the internet.

Preference options are restricted when a date of birth is recognised to be under 16 years of age.

For those under the age of 13, there will be no preference centre available.

However, if an individual does wish to receive communications, a request may be sent to accountquery@swanseaclub.com

The Club will review each request and if appropriate seek the consent of the parent or guardian before updating the individual's preference centre.

If you are a parent or guardian and would like to review any personal information that we have collected online from your child, have this information deleted, and/or request that there be no further collection or use of your child's personal information or if you have any questions about our Privacy Policy or practices, you may contact us at dpo@swanseaclub.com

How we use cookies

Cookies are small pieces of information that are stored by the browser on a computer's hard drive and they are used to record how people use and navigate websites.

For further information, please see our Cookies Policy.

CCTV and Body Worn Video

Please refer to the CCTV Policy and Body Worn Video Policy for further information.

Use of Your Information Outside of the European Union

Some of the organisations to which we may disclose personal information may be situated outside of the European Union. In order to provide the services you require, we may need to transfer your personal information to these countries some of which do not have laws that protect privacy rights as extensively as in the United Kingdom.

If we do transfer your personal information to other territories, we will take proper steps to ensure that the information is protected in accordance with this Privacy Policy and our Data Protection Policy.

Your Rights

We will not process your personal data for direct marketing purposes unless you have given us consent to do so. You have a right to opt in or out of receiving direct marketing at any time.

We recommend that you regularly review the personal information you have supplied to us to ensure that your information is correct and up to date.

You may contact us at any time at dpo@swansecity.com to discuss the information we hold on you.

You have the following rights:

- **Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
- **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, for profiling your suitability for certain roles), or consent to market to you, you may withdraw your consent at any time.
- **Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information. At this point we may comply with your request or, additionally do one of the following:
 - we may ask you to verify your identity, or ask for more information about your request; and
 - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.
- **Right to erasure:** In certain situations, you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.
- **Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.

- Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with the Information Commissioners Office
- If your interests or requirements change, you can unsubscribe from part or all of our marketing content (for example - our newsletter) by clicking the unsubscribe link in the email, or by updating your preferences through our preference centre on our website.

Changes to this Privacy Policy

Privacy laws and practice are constantly developing. Our policies and procedures are therefore under continual review. We may, from time to time, update our privacy policy. Any such changes will be posted on this page.

Contact

Questions, comments and requests regarding this Privacy Policy should be addressed to:

Data Protection Officer
Swansea City Association Football Club Limited
Liberty Stadium
Swansea
SA1 2FA
dpo@swanseacity.com