

GDPR Policy

Harrogate Town AFC CIO is committed to complying with the UK's Data Protection Law and the EU General Data Protection Regulation 2018 (GDPR) for the protection of personal data, as well as the principles of data security in the configuration of our services. To ensure we remain compliant with this regulation, we have to let you know the following information:

The controller is Harrogate Town AFC CIO and we are committed to complying with the UK's Data Protection Law and the EU General Data Protection Regulation 2018 (GDPR) for the protection of personal data, as well as the principles of data security in the configuration of our services. We can be contacted at our registered office address: Harrogate Town AFC CIO, CNG Stadium, Wetherby Road, Harrogate, North Yorkshire, HG2 7SA.

If you have any questions about this privacy notice or how we use your personal data, please contact our GDPR Officer Harrogate Town AFC CIO Community Manager.

Where parents provide their own data, to enable us to provide services to their children, the purpose for processing your personal information is to allow us to administer your account with us and to provide the products and services you have requested from us. In order to enter into an agreement with Harrogate Town AFC CIO, we will collect, store and use elements of your personal data. The lawful basis for processing of this personal data is known as contractual basis and is necessary by Harrogate Town AFC CIO in order to administer your account and to provide the products and services you have requested from us.

When engaging with Harrogate Town AFC CIO, you will usually need to disclose the following:

- Title
- first name(s), surname or company name (including representation as the case may be)
- address (street, street number, postal code, city and country/region)
- email address
- telephone and mobile number
- bank details (account number, account holder and card number)

We may also monitor, record, store and use any telephone call, email or other electronic communications with you for training purposes so that we can check any instructions given to us and to improve the quality of our customer service.

Where parents provide us with their child's information (anyone under 13), or for a child they hold parental responsibility for, to enable us to provide services to their children the purpose for processing your child's personal information is to allow us to provide the products and services you have requested from us, to them. In order to enter into an agreement with Harrogate Town AFC CIO, we will collect, store and use elements of your child's personal data. The lawful basis for processing of this personal data is known as explicit consent and will be required from the parent or person with parental responsibility and is necessary for Harrogate Town AFC CIO in order for us to provide the required service to your child. We will never share your child's data and will ensure any data is disposed of once it has been used for its initial purpose.

When engaging with Harrogate Town AFC CIO you will usually need to disclose the following information for your child:

- first name(s)

- address (street, street number, postal code, city and country/region)
- emergency contact details
- previous and existing medical conditions
- dietary requirements
- sex and ethnicity

Where anyone over the age of 13 provides us with their information to enable us to provide services to them, the purpose for processing their personal information is to allow us to provide the products and services you have requested from us. In order to enter into an agreement with Harrogate Town AFC CIO, we will collect, store and use elements of your personal data. The lawful basis for processing of this personal data is known as explicit consent and is necessary by Harrogate Town AFC CIO in order for us to provide the required service to you.

When engaging with Harrogate Town AFC CIO, you will usually need to disclose the following information:

- title
- first name(s), surname or company name (including representation as the case may be)
- address (street, street number, postal code, city and country/region)
- email address
- telephone and mobile number
- bank details (account number, account holder and card number)
- medical information

We will also process your details through our internal systems to enable us to send you relevant communications. The lawful basis for processing this information internally will be Legitimate Interests. Any email or text communications we send will however comply with the Privacy and E-Communications Regulation (PECR). If you have chosen to opt-in to our direct marketing communications, we will use your information to tell you about products and services available from us which may be of interest to you. We may also use your information to tell you about products and services from our approved partners. You have a right to opt-out of our direct marketing communications at any time. You can opt-out by following the unsubscribe instructions or by emailing our compliance officer.

Data will not be stored from enquiries, only registered participants/parents or guardians of registered participants.

We may send or share your personal information with the following recipients:

- our Customer Service Relations (CRM) software
- the English Football League

Or:

- other parties where you have given us your consent to do so if it is necessary for the performance of an agreement of which you will be made aware in order to obtain professional advice (e.g. legal advice) we or others need to investigate or prevent crime (e.g. to fraud prevention agencies) the law permits or requires it a regulatory or governmental body requests or requires it, even without your consent there is a duty to the public to reveal the information

Where possible, Harrogate Town AFC CIO will take steps to erase any personal data that is no longer necessary for the purposes for which it is collected or otherwise processed, or if you have withdrawn consent for its processing and retention. As a general rule, if you currently have a contract or intend to enter into a contract with Harrogate Town AFC CIO, we will store the data for a period of six years after the contract ends, for compliance with our general legal obligations and for the exercise or defence of any legal claims.

Under the GDPR 2018, you have the right to 'block' or request the deletion or removal of personal data to prevent further processing. This right to erasure is also known as 'the right to be forgotten.' Specific circumstances in which you can request the deletion or removal of personal data include:

- where the personal data is no longer necessary for the purposes for which it is collected or otherwise processed
- where you withdraw consent
- when you object to the processing and there is no overriding legitimate interest for continuing the processing
- where the personal data was unlawfully processed (i.e. otherwise in breach of the GDPR)
- where the personal data has to be erased in order to comply with a legal obligation
- in case a deletion is not possible due to legal, statutory or contractual retention periods, or if it requires disproportionate efforts or prejudices your legitimate interests, the data will be blocked instead of deleted.

You also have the right to see what personal information we are processing. This can be requested by emailing our GDPR Officer. There will be no charge for this service. If, however, you log multiple requests, then there may be nominal charge, which we will request to cover the administration of these requests.

You may also request from us a copy of the personal data which has been processed through automated means. This will be provided in a structured, commonly used, and machine-readable format (where technically feasible) which you may then transmit to another controller. You have the right to request us to send this to another controller on your behalf, but only if this is technically feasible for us to do so.

You have the right to withdraw your consent for us to collect, process and store your data at any time. If you wish to withdraw your consent, please confirm this in writing to our compliance officer

If you have a complaint about any aspect of data protection or if you feel your privacy has been breached by us, we would like to hear from you. To help us investigate and resolve your concerns as quickly as possible, please contact our GDPR Officer.

If you are unhappy with the final response you have received from Harrogate Town AFC CIO, you have the right to complain to the supervisory authority, the Information Commissioner's Office (ICO). You can contact the ICO on 0303 123 1113 or by visiting their website: <https://ico.org.uk/>

You will be required to provide personal data, and this is a requirement so we can provide the services that we offer you. You are obliged to provide this data. Failure to provide this personal data may mean we will be unable to execute your request and could result in termination of our services.

If, at any time, we intend to further process your personal data for a reason not originally communicated, we shall provide you, prior to that processing taking place, all relevant information on the additional processing.

Reviewed & Updated: September 2019 HTAFC will review this **GDPR Policy** and good practice at least annually.