



Privacy Notice

Created: February 2022

Effective date: July 2023

Revised by: Digital Lead and CEO

Next review date: July 2024

Bloomsbury Football Foundation (the “Charity”) takes your privacy very seriously. It is the Charity’s policy to deal with your personal information responsibly and in accordance with the requirements of applicable data protection laws.

This Privacy Notice sets out the personal information that we collect from you, and how we use, store, and in certain circumstances, share that information.

The Charity is a data controller with respect to activities regarding your personal data. This means that we can take decisions regarding the means and purpose of the processing of personal data in accordance with applicable data protection laws.

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, in certain circumstances, transfer some personal data of participants in Charity activities, and, where applicable, their parents or guardians.

You provide information about yourself when you register with the Charity or where you otherwise participate in the Charity’s activities, for example by filling in forms at an event or online, or by corresponding with us by phone, e-mail or otherwise. The reasons we need participants’ personal data include: to allow for the day-to-day running of the Charity

and the Charity's activities; to arrange matches, tournaments, and other events in which Charity members may participate; to market the Charity's activities, for safeguarding purposes, and to provide, administer and maintain participants' memberships with the Charity.

The personal data that you give us may include:

- name;
- date of birth;
- contact details including postal address, e-mail address, and phone number;
- financial information such as credit card or bank details, free school meal (FSM) assistance details, and universal credit (UC);
- gender; and
- third party contact details for cases of emergency.

If you participate in certain matches, tournaments, or events that the Charity organises or participates in, then photographs or videos may be taken of you at such events. Participants (or their parents or guardians where applicable) will be asked when they register for Charity activities if they consent to photographs or videos of them being published for Charity promotional purposes. If participants (or their parents or guardians where applicable) do not consent then the participant will be given a coloured wristband so as to indicate to the photographer and/or videographer that their photograph/video should not be published.

We may also ask for certain data that is defined as "special category" data. For example:

- Relevant health and disability information, which is collected for the purposes of protecting participants' health, wellbeing, and welfare, and for safeguarding purposes. Where we hold this data, it will be with the explicit consent of the participant or, if applicable, the participant's parent or guardian.

- Information related to ethnicity which is collected to ensure equality of opportunity and treatment, and also because required to collect for the purposes of reporting for obtaining funding sources. Such data is anonymised before it is shared.

Where we need to collect personal data to fulfil the Charity's responsibilities and you do not provide that data, we may not be able honour or administer your registration for the Charity's activities.

The bases upon which we process your personal data

We will only use personal data for the purpose (or purposes) for which it has been specifically provided.

We have set out below, in a table format, a description of the ways we may use your personal data, and the legal basis that we rely on to do so. We have also identified what our legitimate interests for collecting and processing personal data are, where applicable.

Purpose/ Processing Activity	Lawful Basis for processing under Article 6 of the GDPR.
Processing participation forms and payments.	The Charity has a legitimate interest in maintaining up to date records of members, and receiving payments in connection with memberships.
Organising matches, including provision of match information and updates on matches to participants.	The Charity has a legitimate interest in enabling the participation of its members in matches and related activities.
Providing updates on Charity information, membership renewals, social events, and training sessions.	The Charity has a legitimate interest in updating participants on activities that are relevant to their participation in the Charity's activities, and for Charity community purposes.
Sharing data with coaches, managers or officials to run training sessions or enter and participate in events (such as matches).	The Charity has a legitimate interest in enabling the participation of its members in training sessions, matches, and related activities.
Sharing data with the Football Association, leagues we are in membership of, county associations and other competition providers for entry in events.	The Charity has a legitimate interest in enabling the participation of its members in matches and related activities.
Sharing data with third party service or facility providers.	The Charity has a legitimate interest in running its organisation efficiently and as it sees fit, for the benefit of the Charity, and its participants.
Sharing anonymised data with a funding partner as condition of grant funding or for the purposes of HAF funding (holiday activities and food) e.g. Local Authority	The Charity has a legitimate interest to run the organisation efficiently and as it sees fit. Application for funding is a purpose that benefits the Charity, and its participants.

Sending out marketing information such as newsletters and information about promotions and offers from sponsors.	The Charity has a legitimate interest in marketing its activities. Marketing materials are only sent to existing participants in the Charity's activities, or individuals who have signed up to receive them. Individuals who receive marketing materials have the ability to opt-out..
Publishing match and league results and publishing photos and/or videos of participants in matches, leagues and other Charity-organised events.	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 when registering with the Charity. In the case of children under the age of 13 then we will only publish such information with written consent of parent/guardian.
To ensure we understand possible health risks	Consent. We will only process details on your medical history with your consent. In the case of children under the age of 13 then written consent of the parent or guardian of the child in question will be obtained.
Collection of data pertaining to ethnicity/racial origin	To ensure equality of treatment and opportunity. Such data is also shared with the Local Authority on an anonymised basis as a requirement for funding. Application for funding is a purpose that benefits the Charity and its participants.

Who we share your personal data with

We may need to share your personal data with certain third-parties. Who we share your personal data with depends on your relationship with the Charity. The following examples may apply:

- If you participate in matches, tournaments, or other events through the Charity that are organised by the English Football Association ("FA"), your personal data may be shared with the FA in order to enable your participation and then may be entered onto the Whole Game System database which is administered by the FA.
- Similarly, if you participate in matches, tournaments, or other events organised by County Football Associations or other leagues, your personal data may be shared with those organisations for the purposes of enabling your participation.
- We may share certain of your personal data (such as names on team sheets) with referees, coaches or match organisers.
- In some circumstances we may be required to disclose your personal information to third parties to comply with a legal or regulatory obligation; or to protect the

rights, property, or safety of our participants, members or affiliates, or others. Where possible, we will use reasonable efforts to notify you before disclosing your information but we may be legally restricted from doing so.

We may from time to time use cloud-based software that may involve data being stored and/or processed outside of the UK or EU. We use reputable service providers who provide appropriate protection in relation to 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.

For example:

- Individuals responsible for running the Charity's day-to-day activities do so using Microsoft 365 accounts with multi-factor identification.
- Devices used by individuals responsible for running the Charity's day-to-day activities are password protected and installed with up-to-date anti-virus software.
- Team registers are created on a cloud-based software (Salesforce) and exported onto a centralised filing system (Onedrive) which is password protected.
- Personal data that is stored in hard copy, is kept in locked storage.

How long we hold your personal data

We retain personal data of our participants and members for the period during which they maintain a membership with the Charity and/or are actively involved in the Charity's activities, or are otherwise actively involved with the Charity.

If we determine that an individual is no longer participating in or engaging with Charity activities, then we will delete any personal data that is held in respect of them within 30 days, 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 the Charity may share with the FA, and which is then stored on the FA's 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 the FA.

Your rights regarding your personal data

Applicable data protection laws provide certain rights for data subjects. Broadly speaking, you have, or may have, the right:

- To request details of the information we hold about you and how we process it;
- To have your personal information rectified if it is inaccurate or deleted;
- To restrict our processing of your personal information;
- To withdraw a previously provided consent to processing of your personal information;
- To stop unauthorized transfers of your personal information to a third party;
- To have your personal information transferred to another person;
- To complain about our processing of your personal information to the UK Information Commissioner's Office.

It is important to be aware that these rights may not be absolute. For example, if you withdraw your consent to our processing of your personal data, we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in meeting our legal and regulatory obligations.

As a data subject you are not obliged to share your personal data with the Charity. If you choose not to share your personal data with us then we may not be able to register or administer your membership.

Changes to this Privacy Notice

We regularly review our Privacy policies and may make changes as our services or privacy practices change, or as required by applicable laws and regulations. Future versions of our Privacy Notice will be available on our website. We encourage you to review this Privacy Notice periodically to be informed of how we use your personal information.

If you have any questions about this Privacy Notice then please contact our Digital Lead.

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Charlie Hyman

Charlie Hyman
CEO

Sep 21, 2023
Date

*The procedure to review this document includes (1) the Digital Lead and CEO are to update the document annually; (2) appropriate advice will be sought to ensure the policies and procedures contained in the document comply with the relevant legislation and regulations; and (3) the Digital Lead and CEO will review the changes made to the document and sign it off when concluded.