



Privacy Policy May 2018

Review May 2019

Contents

Introduction	Page 2
Our role	Page 2
What information we collect	Page 2
Lawful basis and purposes for processing your personal data	Page 3
How we will use this information	Page 3
Disclosure of your information	Page 4
Links	Page 4
Direct mailings	Page 4
Keeping your data secure	Page 5
Retention periods	Page 5
Your rights	Page 5
Contact us or the ICO	Page 6

1. Introduction

This privacy policy sets out the privacy practices of Blackpool FC Community Trust (“we”, “us”, “our”), a Charity in England, Charity Number 1128235 and having its registered office at Blackpool FC, Seasiders Way, Blackpool FY1 6JJ. Our website is www.blackpoolfccommunitytrust.co.uk.

In order to provide our services to you and promote our business, we will need to collect and process certain personal data about you.

We are committed to protecting the privacy and security of your personal information, in accordance with the applicable data protection laws, including the General Data Protection Regulation, together the “Data Protection Laws”. This privacy policy describes how we collect and use personal information about you during and after our relationship with you.

If you have any questions at all about this policy, the website, or about how we use and process your personal information, please do not hesitate to contact us by e-mail at office@bffct.co.uk or, alternatively, in writing to Blackpool FC Community Trust, Blackpool FC, Seasiders Way, Blackpool FY1 6JJ.

2. Our role

In order to enable us to provide you with a service, we collect certain personal data. We will therefore hold the information you provide to us.

As a service provider we need to collect information about you to deliver the best possible service and to report back to our funders in order to enable our services to continue.

3. What information we collect

Many Blackpool FC Community Trust programmes are funded by external organisations, for more information in regards to who funds our programmes please email office@bfct.co.uk.

In order to be able to access these funds we are required to collect certain information, dependent upon what user group the project or programme is targeting. However, any information that we share with external funders is anonymised to become non-identifiable information.

When you submit personal information in connection with attending our provision, your information is used to monitor and evaluate the success of our provision and to enable us to identify gaps in provision to improve our business.

When you visit the Blackpool FC Community Trust website we will automatically collect the following information:

- a. technical information, including the internet protocol (IP) address used to connect your computer or mobile device to the internet, type of mobile device you use, a unique device identifier, mobile network information, your login information, browser type and version you use, browser plug-in types and versions, operating system and platform.
- b. information about your visit to our website, including the full uniform resource locators (URL) clickstream to, through and from our Website (including date and time); pages you viewed or information you searched for; page response times, download errors, length of visits to certain pages.
- c. Details of your visits to other websites through our website.

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you use the Website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them, see our cookie policy.

4. Lawful basis and purposes of processing your personal data

We collect information about you so that we can:

- a. Administer our contracts with external funders and partners
- b. Monitor our services
- c. Promote our business and market our services
- d. Promote the safety and welfare of our users
- e. Manage our business, including for accounting and auditing purposes
- f. Deal with legal disputes involving you
- g. Prevent fraud
- h. Comply with regulatory obligations

We will only use your personal information when the law allows us to, i.e. when it is necessary to:

- a. Perform our contractual obligations to you
- b. Comply with our legal and regulatory obligations
- c. Pursue our legitimate interests (e.g. we may need to contact you to inform you about a change of day for one of our programmes in order to keep you involved)

When you provide us with your individual contact details (for example your email address), we will rely on your consent (opt in) to send you electronic information such as newsletters about our programmes and/or services. If we hold your business contact details we will rely on legitimate interest of the business to send you electronic communications.

We will always provide an option to unsubscribe from future communications of any kind.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. How we use this information

We will use the information we receive from you to:

- a. Notify you about changes in our services, our terms and conditions or this privacy policy
- b. Keep you updated about new opportunities through our newsletters and other communications (if you have opted in)
- c. Communicate with you in response to a specific action performed by you, for example an enquiry about our services
- d. To inform our funders of who has taken part in our programmes (this data will be anonymised)

We will use the information we collect about your use of our website to:

- a. Administer our website for internal operations, including troubleshooting, data analysis, testing and statistical purposes
- b. Improve our website to ensure that content is presented in the most effective manner for you and for your computer and/or mobile device
- c. Help us improve and personalise our services
- d. Enable us to keep our website safe and secure
- e. Make suggestions and recommendations to you and other users of our website about goods and services that may interest you.

6. Disclosure of your information

We do not sell or share your personal data with third parties to use them for marketing purposes.

We will share your information with the following:

- Our programme funders and/or partners (non-identifiable data)
- Law enforcement agencies in connection with any investigation to help prevent unlawful activity

Whenever we share your data we require third-parties (funders/partners) to respect the security of your data and treat it in accordance with the law. All our third-party service providers are required to take appropriate security measures to use your personal data. We do not allow third-party organisations to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

We also reserve the right to disclose the information collected about you to our professional advisors and/or if we, in good faith, believe it necessary to protect the personal safety of users or the public.

7. Links

The website may contain links to other websites. Please be aware that we are not responsible or liable for the privacy practices of other websites. We encourage you to be aware when you leave the website and to read the privacy policies of each and every website that collects personally identifiable information. This privacy policy applies solely to information collected by us on the website.

8. Direct mailings

We may occasionally send out newsletters, offers or alerts to our members and to other business contacts.

Where required by the Data Protection Laws (for example, if you have provided your personal contact information) we will send you such information only if you have specifically elected/opted in to receive it. You can unsubscribe/opt-out from receiving such communications at any time – please see “Your rights” section below. From time to time we may request information from you via surveys or contests. Participation in these surveys or contests is completely voluntary and you, therefore, have a choice whether or not to disclose this information. Information requested may

include contact information (such as name and address), and demographic information (such as postcode or age). Contact information will be used to notify the winners and award prizes. Survey information will be used for purposes of monitoring or improving the use of and satisfaction of our services.

9. Keeping your data secure

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

10. Retention periods

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer our customer, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

11. Your rights

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law, you have the right to:

- a. Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a confirmation from us as to whether we process any of your personal information or not, and if this is the case, to receive a copy of such personal information and to check that we are lawfully processing it.
- b. 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.
- c. Request erasure of your personal information (often referred to as “the right to be forgotten”). 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 delete or remove your personal information where you have exercised your right to object to processing (see below).

- d. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- e. 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, or if we no longer need your data for our legitimate interests but we need to hold some of it for the purpose of legal proceedings.

If you would like to exercise any of the above rights, please:

- a. email, call or write to us (see our contact details below)
- b. let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill). This is to allow us to verify your identity and prevent disclosure to unauthorised third parties
- c. let us know the details of your request, for example by specifying the personal data you want to access, the information that is incorrect and the information with which it should be replaced.

You can always unsubscribe from our email communications at any time by following the unsubscribe link in our email communications, or by updating your communication preferences by contacting us on the details below.

12. Contact us or the ICO

If you have any concerns or complaints about our privacy activities, you can contact us on 01253 348691 or office@bfcct.co.uk. You can also contact the Information Commissioner's Office on 0303 123 1113.

For more details about your rights under the current Data Protection Act, the rules we have to adhere to in collecting and storing your information, and how you can check your data records, please visit <https://www.gov.uk/data-protection/the-data-protection-act>.

This policy will be reviewed in the event of a data breach and/or any updates to relevant legislation.