Premier League – Player and Related Persons Privacy Policy

This policy explains how the Premier League uses personal data provided by, or received in respect of, players and academy players (including EFL players) as well as persons associated with such players and the Premier League (but other than those employed or contracted by the Premier League) including, player family members, match officials, agents, managers, trialists, coaches, scouts, club staff, directors (including shadow directors and club owners) and the personnel of current and prospective broadcast partners and other official licensees (collectively referred to as Related Persons, and individually as you or your), in accordance with the General Data Protection Regulation (including as adopted under UK law following the end of the Brexit transition) and other applicable data protection legislation including the Data Protection Act 2018 (together, the Data Protection Law).

We keep our privacy practices and procedures under review and we may amend this policy from time to time. This version is dated August 2020.

PLEASE READ THIS POLICY, TOGETHER WITH ANY OTHER PRIVACY NOTICES, INCLUDING THE PREMIER LEAGUE’S SAFEGUARDING PRIVACY POLICY, WHICH WE MAY PROVIDE TO YOU, CAREFULLY SO THAT YOU ARE AWARE OF AND UNDERSTAND THE WAYS IN WHICH WE COLLECT AND USE YOUR PERSONAL DATA.

This policy applies to our use of your personal data, but other organisations such as the Football Association (the FA), English Football League (the EFL), the Professional Footballer’s Association (the PFA), the Union of European Football Associations (UEFA) and Fédération Internationale de Football Association (FIFA) (together, the Football Authorities), the Professional Game Match Officials Limited (PGMOL) and the Premier League’s and EFL’s member football clubs (each a Club) (as applicable) are also likely to collect and use your personal data and you should also refer to their respective privacy policies to understand how each of these organisations collect and use your personal data.

1. Background

1.1. When personal data is collected and used for the purposes of this policy, the Premier League is a “controller” under the Data Protection Law which means that we are responsible for deciding how we use the personal data that we collect about you.

1.2. In accordance with the Data Protection Law, we will ensure that the personal data we hold about you is, at all times:

(a) used fairly, lawfully, and transparently;
(b) collected for limited, specific purposes only;
(c) adequate, relevant to and limited to what is necessary for those purposes;
(d) kept accurate and up-to-date;
(e) not kept for longer than is necessary; and
(f) held securely.
1.3. We shall be accountable for and able to demonstrate our compliance with our obligations under the Data Protection Law, and this policy is one of the ways in which we do that.

1.4. We have appointed a Data Protection Lead to oversee compliance with this policy and our data protection compliance activities. The Data Protection Lead has also established a dedicated data protection team to provide the necessary support.

2. What Personal Data we collect and when

2.1. Personal data means any information about you from which you can be identified. It does not include data where your identity has been removed (i.e. anonymous data). There are also more sensitive personal data which require a higher level of protection, for example personal data revealing or concerning a person's racial or ethnic origin, religious or philosophical beliefs, sex life, sexual orientations, political opinions, trade union membership and information about health and genetic and biometric data (Special Category Data) and personal data relating to criminal convictions and offences (Criminal Offence Data). We collect and use a range of personal data, including some Special Category Data and Criminal Offence Data (together Sensitive Data) in certain circumstances (as also described in our separate Safeguarding Privacy Policy), depending on your role or relationship with the Premier League.

2.2. You provide some of your personal data to us directly (or via your Club):

(a) the information you submit in Premier League registration forms and contracts (for example, the Premier League Contract (Form 19) or Academy Player Registration Application (PLYD Form 5));

(b) the information contained in identification documents you are required to provide in order to confirm your identity and eligibility (for example, birth certificate, passport and immigration documents);

(c) the information you provide when you enrol in programmes and training initiatives and other events administered by the Premier League;

(d) the information you provide in order to register to use certain digital platforms and/or services we provide to you;

(e) your photograph and other media recordings (for example, upon joining the Premier League or a new Club, or during Premier League photoshoots);

(f) the information you submit when completing forms and surveys issued by us as and when required (for example, dietary requirements);

(g) details of incidents and/or allegations of suspected abuse of or unsuitable behaviour towards a child or adult at risk in accordance with our rules and separate Safeguarding Privacy Policy;

(h) information on your behaviour in relation to sports integrity and personal conduct including records of incidents and allegations of Premier League rule breaches and details of how such incidents and allegations are resolved (such information may include Sensitive Data);

(i) your contact details and any emergency contact details;

(j) details of your email address or phone number so that you may register for the Premier League Player Application (if applicable); and
(k) any other personal information you share with us, including by way of email, telephone call or interview.

2.3. When you are asked to provide non-mandatory information to the Premier League this will be clearly indicated.

2.4. We will also collect other personal data relevant to your Premier League-related activities from your Club or other third parties.

2.5. Clubs provide us with (as applicable):

(a) copies of player and manager contracts which include additional personal data such as details of remuneration;

(b) a copy of the representation agreement entered into by a player with intermediaries;

(c) details of compensation agreements and personal loans;

(d) details of staff roles (for example, via the Staff Registration System) and qualifications (where relevant);

(e) details of staff and player training;

(f) an academy player’s “Performance Clock” (as described in more detail in the Premier League’s Youth Development Rules);

(g) certain information in connection with Club academy quality assurance purposes (for example, via the Academy Standards Application) (as described in more detail in the Premier League’s Youth Development Rules);

(h) information on your behaviour in relation to sports integrity and personal conduct including records of incidents and allegations of Premier League rule breaches and details of how such incidents and allegations are resolved (such information may include Sensitive Data); and

(i) certain medical and health data including in relation to COVID-19 testing.

2.6. The FA also provides us with documents concerning a player’s “right to work” in the UK and a copy of the International Transfer Certificate.

2.7. We may also collect or receive (and in the case of (a) below license the creation by Football DataCo Limited or its media licensee Perform Content Services Limited trading as Opta and its betting and gaming licensee Genius Sports Group Limited trading as Betgenius or its tracking data licensee Second Spectrum Inc (our Data Licensees) and their licensees and in the case of (b) below license the creation by our broadcast partners, but in each case as separate data controllers) the following (as applicable):

(a) live on-field tracking and performance data (for example, positioning, distance run and passes made) (Tracking Data), other match event data (for example, goals scored or fouls conceded) (Event Data) and match-related photographs and still images;

(b) match-related broadcasts, transmissions, videos and other recordings;

(c) information in relation to an academy player’s education records (for example, exam results and target grades) from the Department of Education;

(d) information in connection with a retired player’s future career opportunities;
(e) information on your behaviour in relation to sports integrity and personal conduct including records of incidents and allegations of Premier League rule breaches and details of how such incidents and allegations are resolved (such information may include Sensitive Data);

(f) information regarding racial or ethnic origin or other Sensitive Data as part of the Premier League’s monitoring and promotion of equality of opportunities (our Diversity Programmes); and

(g) contact details for the personnel of current and prospective broadcast partners and other official licensees and other personal data as required for the negotiation and performance of contractual and commercial arrangements.

2.8. The Premier League takes its duty to safeguard vulnerable people, including youth players and other children, seriously, by conducting independent audits of Clubs as well as collecting and analysing records of incidents and allegations of abuse, exploitation or inappropriate conduct, by reference to the law and our rules and regulations.

2.9. Please note that we may collect and use your personal data (including from public sources) without your knowledge or consent where this is required and/or permitted by law. For more information on how we collect, use and store personal data relating to the above please refer to our Safeguarding Privacy Policy.

2.10. The Premier League is also committed to taking action against racism in football and society generally and has launched a programme to monitor social media for racist material aimed at Premier League players (using relevant keywords) in order to ensure its expeditious removal from social media and to report on such material to other stakeholders including the Clubs, the FA, EFL and Kick It Out (our Online Abuse Programme).

3. How and why we use your Personal Data

3.1. We collect and use personal data for a range of specific and legitimate reasons which will vary depending on your role or relationship with the Premier League. We only collect and use personal data in accordance with Data Protection Law. For the most part, we collect and use personal data because it is necessary for our “legitimate interests”, that is, in order to operate, administer, promote, regulate and govern the Premier League competitions and to support Clubs' associated activities in an effective and lawful manner.

3.2. In particular, it is necessary:

(a) to confirm identity and eligibility in the application of rules and regulations relating to player registration and transfers in order to ensure that players are eligible to play for, and where relevant be employed as a professional player by, their Club in the Premier League competitions;

(b) to confirm identity and eligibility in the application of rules and regulations relating to Club employment, qualifications and licensing in order to ensure individuals are eligible to undertake certain roles at Clubs (for example, administration of the owners’ and directors’ test);

(c) to create an accurate picture of racial, ethnic diversity within football to allow for informed assessments to be made about, and action taken in respect of, equality of opportunity in the Premier League and EFL. NOTE: in accordance with Data Protection Law (and in addition to what is set out under Your Rights in Connection with Your Personal Data below) you may at any time give us written notice requiring us to stop
processing your personal data for this purpose within a reasonable period;

(d) to ensure contracts and registration documents comply with the rules and regulations set
down by the Football Authorities (as well as our own);

(e) for identity verification purpose so as to maintain a high level of security at matches and
other Premier League events (including by producing identity cards);

(f) to help provide the Players’ Pensions Scheme (administered by AON);

(g) to audit Club development and training initiatives (including Academies) to ensure Clubs
are meeting the standards set out in the Premier League Rules;

(h) to administer, deliver and support Academy player education and coach development;

(i) to prevent unauthorised access to confidential information (including personal
information) by creating registered accounts for use of certain digital platforms/services
which we provide to you;

(j) to record and confirm player match appearances and performances;

(k) for safeguarding vulnerable individuals like youth players and other children in
accordance with our separate Safeguarding Privacy Policy;

(l) to comply with health and safety and other legal obligations and uphold our duty of care
towards you and other individuals;

(m) to act against racism including as part of the Online Abuse Programme;

(n) to resolve disputes and allegations;

(o) to communicate with you;

(p) to maintain integrity and prevent crime and corruption within football;

(q) to promote and/or commercialise Premier League football including by publishing or
sharing photographs of and information on players and match officials and their
performances and by sharing information such as Tracking Data and Match Data with
broadcast partners and/or commercial partners;

(r) to protect and enforce our rights and, where necessary or appropriate, take legal action;

(s) to generate internal reports to help develop and improve Premier League rules, policies,
procedures and strategies (for example in response to the impact of Brexit on Premier
League football);

(t) for preserving the history of football and the Premier League competitions; and

(u) for other administrative and statistical tasks required to discharge the Premier League’s
function as a governing, regulatory and organising body of football.

3.3. Before using your personal data for our legitimate interests, we make sure that we take into
account any potential impact that such use may have on you to ensure that your interests and
fundamental rights and freedoms do not override those interests. In other words, we have
determined that the Premier League has a legitimate need to process your personal data and we
are not aware of any reasons that, on balance, mean we should not be doing so. If you have
concerns about our processing please refer to Your Rights in Connection with Your Personal
Data below.

3.4. In accordance with Data Protection Law, in rare circumstances we may also use your personal data because:

(a) we need to comply with a legal obligation (for example, because the court has ordered us to do so); or

(b) it may be necessary to protect yours or someone else's vital interests in emergency situations.

3.5. We generally do not rely on your consent in order to process your personal data and we will inform you specifically when we seek to obtain this from you as well as your ability to withdraw that consent at any time.

Sensitive Data (i.e. Special Category Data and Criminal Offence Data)

3.6. We also only use Sensitive Data in accordance with the Data Protection Law and therefore only if:

(a) It is necessary for reasons of substantial public interest. Data Protection Law provides for the use of Sensitive Data where it is necessary for the purposes of:
   (i) measures designed to protect the integrity of a sport or a sporting event. This includes measures to prevent or protect against dishonesty, malpractice or other seriously improper conduct, or failure by a person participating in the sport or event in any capacity to comply with standards of behaviour set by a body or association with responsibility for the sport or event. We rely on this condition in performing our governing, regulatory and oversight function for the Premier League competitions;
   or
   (ii) measures designed to eliminate (including to identify or prevent) doping which are undertaken by or under the responsibility of a body that is responsible for eliminating doping in a sport generally and for the purposes of providing information about doping or suspected doping to such a body or association (such as the Football Authorities and the World Anti-Doping Authority). We rely on this condition in performing our governing, regulatory and oversight function for the Premier League competitions; or
   (iii) the prevention or detection of an unlawful act which must be carried out without the consent of the data subject so as not to prejudice such purposes. We may need to rely on this condition in performing our governing, regulatory and oversight function for the Premier League competitions;
   (iv) protecting children and individuals at risk from neglect or physical, mental or emotional harm, or protecting the physical, mental or emotional well-being of an individual where consent cannot be or reasonably expected to be obtained or may prejudice the provision of protection. We rely on this condition under our Safeguarding Privacy Policy; or
   (v) identifying or keeping under review the existence or absence of equality of opportunity between groups of people with a view to enabling such equality to be promoted or maintained. We rely on this condition in relation to our Diversity Programmes.

(b) It is necessary for the establishment, exercise or defence of legal claims or where you have already made the information public. We may need to rely on this condition in performing our governing, regulatory and oversight function for the Premier League competitions, and may also need to do so under our Safeguarding Privacy Policy.

(c) We have your explicit written consent. In limited circumstances, we may approach you for your written consent to allow us to process certain Sensitive Data where there is no other legal basis. If we do so, we (or a third party) will provide you with full details of the information that we would like and the reason we need it, so that you can carefully
consider whether you wish to consent. For example:

- we are interested in collecting information about player's racial or ethnic origin to ensure meaningful equal opportunity monitoring and reporting, and players' are given the option to submit this information to us via their Club on the relevant form; and

- we request information concerning a youth player's medical, dietary and other additional needs so that we can run tournaments and other events safely.

You have the right to withdraw your consent at any time and can do so by contacting us using the details provided below.

(d) **In emergency situations.** We may need to process your Sensitive Data or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent.

3.7. Unless otherwise required or permitted by law, before using your personal data for a purpose unrelated to the reason we collected it, we will notify you and explain the purpose and legal basis which allows us to do so.

3.8. If you have any questions or require any additional information about the purposes for which your personal data is required and/or our legal justification you can contact the Premier League's dedicated Data Protection Team using the contact details set out below.

4. **Who we share your Personal Data with**

4.1. In order to function effectively as a governing, regulatory and organising body in football and administer our relationship with you and your role within football as set out above we may share certain elements of your personal data with other individuals and organisations, always on a need-to-know-basis and for legitimate prescribed reasons:

(a) we share relevant player registration and identity information with the FA for verification and administrative purposes (including team sheets for the purpose of facilitating player scouting);

(b) we share player registration information (including details of player transfer fees) with the EFL for administrative purposes;

(c) we share relevant player and Club staff data with Professional Game Academy Audit Company Limited to facilitate its auditing activities;

(c) we share a player's registration and Performance Clock data with their new Club upon transfer;

(e) we provide player photographs or images from footage to:

- Clubs for use on their websites, social media and matchday programmes;

- our domestic and international broadcast partners (including IMG Media Limited, trading as Premier League Productions) for broadcasting matches and related content and for use on websites and social media;

- our Official Electronic Games Licensee (currently EA Sports) to produce football video games. We also procure access for the Licensee, through the Clubs, to obtain facial scans of certain leading players, as well as the provision of Tracking Data and
Event Data, for use within those games;

- our Official Trading Cards and Sticker Licensee (currently Panini) to produce stickers and trading cards; and
- our other partners (currently Budweiser, Barclays, EA, Coca Cola, Tag, Nike) for use in certain of their promotional activities.

(f) broadcasts, transmissions, video and other recordings of players, match officials and other participants (including match footage, dynamic walks to camera and player name pronunciation, promotional messages and preview or post-match interviews and/or features) recorded on behalf of the Premier League are shared with domestic and international broadcast partners and IMG Media Limited, trading as Premier League Productions;

(g) we share certain personal data contained in Club staff contracts and details of qualifications with UEFA in order to comply with UEFA licensing requirements and Financial Fair Play Regulations;

(h) we share personal data concerning safeguarding issues with Clubs, the FA and official authorities as necessary in accordance with our separate Safeguarding Privacy Policy;

(i) we provide personal data (including, where necessary important medical and dietary information) to individuals employed to work at tournaments and events administered by the Premier League;

(j) we share Club staff contact details with Premier League partners to allow relevant individuals to deal with each other directly;

(k) we share limited (and nameless) injury data with a professional medical consultant to produce injury surveillance reports;

(l) we (working with the Department of Education) share academy players’ education records with an education data consultant for analysis and verification in order to track attainment;

(m) we procure the provision of Tracking Data and Match Data and video footage through our Data Licensees to Clubs, broadcast and sports data partners and other third party licensees for commercial, statistical and analysis purposes including use in physical and online betting and gaming products and services;

(n) information may be shared between the Premier League and those individuals determining the outcome of disciplinary or regulatory proceedings and appeals in respect of such proceedings;

(o) we may share personal data concerning regulatory and sports integrity issues with the FA, the police, the Gambling Commission and (if required) FIFA/UEFA;

(p) we share certain player personal data with AON to administer the Players’ Pension Scheme; and

(q) we make available contact details of the personnel of broadcast partners for access by those individuals within an extranet operated by IMG Media Limited, trading as Premier League Productions, with whom the Premier League is joint data controller of such personal data and relevant data subjects may assert their rights in respect of such processing by contacting either joint controller (please refer to Your Rights in Connection with Your Personal Data below).
4.2. We also share elements of your personal data with third parties who provide the Premier League with certain services to facilitate our business operations (as described above):

(a) web/app hosting;
(b) software/app development and maintenance;
(c) data/document management systems;
(d) archiving and storage services;
(d) the production of identity cards; and
(e) media production, including licensed photo agencies.

4.3. All third-party service providers who we share your personal data with are required to take appropriate security measures to protect your personal data and to comply with certain contractual terms in relation to the use of your personal data. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified limited purposes and in accordance with our written instructions.

5. Transferring personal data outside the EEA

5.1. Some countries outside of the UK and the European Union (EU) do not have laws that protect privacy rights and personal data as extensively as the UK and countries in the EU. Therefore, in accordance with Data Protection Law, if we do transfer your personal data outside of the UK and the EU, we ensure that your personal data is afforded a similar level of protection by ensuring one the specific safeguards approved by the European Commission is in place. You can find further information about these safeguards at https://ec.europa.eu/info/law/law-topic/data-protection_en.

5.2. We only routinely transfer personal data outside of the UK and the EU in the following circumstances:

(a) our Data Licensees transfer Tracking Data and Match Data to non-EEA broadcast partners for public broadcast or sports data partners for commercial, statistical and analysis purposes;
(b) in certain circumstances we share player personal data with FIFA which is located in Switzerland; and
(d) we transfer personal data required to arrange and administer international Premier League events such as the Premier League Asia Trophy (for example team sheets and to arrange visas).

5.3. We use our branch office in Singapore to process certain Personal Data in relation to the Online Abuse Programme.

5.4. If you would like further information on the specific mechanism used by us when transferring your personal data out of the EEA please contact us using the details provided below.

6. Security of your Personal Data

6.1. The Premier League is committed to protecting your privacy and has 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. In addition, we limit access to your personal data to those employees, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Details of these measures are available upon request using the details provided below.

6.2. 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.

6.3. Where we have given you or you have chosen a password which enables you to access certain digital platforms/services, you are responsible for using reasonable care in keeping this password confidential.

7. Data Retention

7.1. In accordance with Data Protection Law, we will only keep your personal data:

(a) for as long as necessary to fulfil the specific purposes we collected it for - for example, we will retain your contact details until such time as there is no foreseeable need to communicate with you. In a lot of cases, we wish to retain personal data because, although it is no longer necessary to process it currently, it is likely to become necessary to do so again in the near future. For instance, where your Club is no longer competing in the Premier League but may do so again in the future;

(b) to the extent reasonably necessary to comply with a legal requirement or legal reasons - for example, documents containing personal data may need to be retained for an extended period of time (generally for six years) if there is a real risk that they could be the subject of a claim, or may otherwise be relevant to future litigation; or

(c) as advisable in light of certain legal issues (or potential issues) - for example, we may retain information in relation to safeguarding issues after the conclusion of an investigation so that we can address historical allegations in the future.

7.2. 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.

7.3. In accordance with the Premier League's Data Retention Policy and Data Protection Law, after the applicable retention period has ended, the personal data will be either (as applicable):

(a) securely deleted or destroyed - when the information is no longer required in any form;

(b) anonymised (so that it can no longer be associated with you) - for example, where the data remains useful in an aggregated/generic form for statistical purposes; or

(c) transferred to the Premier League "archive" - an "archive" is a collection of personal data which is no longer necessary to achieve the purposes for which the information was originally collected or which is no longer used for general business activities, but are used only for historical, scientific or statistical purposes, dispute resolution, or investigations. We wish to continue to retain some personal data as it effectively forms part of the history of the Premier League, its competition and the sport of football, for example, player registration information after the player has retired. We maintain appropriate measures to keep archived personal data secure, in accordance with Data Protection Law.
7.4. Specific details of retention periods for different aspects of your personal data are available upon request by using the contact details provided below.

8. **Your rights in connection with your Personal Data**

8.1. Under Data Protection Law, you have certain rights (depending on the circumstances) in connection with your personal data, which include:

(a) **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it, provided always that this does not adversely affect the rights and freedoms of other people.

(b) **Request correction** of the personal data that we hold about you. Where any of the information we hold about you is incorrect or incomplete we will act promptly to rectify this, including where you have requested us to do so.

(c) **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below).

(d) **Object to use** of your personal data where we are relying on our legitimate interests (see “How and why we use your Personal Data”) and there is something about your particular situation which makes you want to object to our use on this ground.

(e) **Withdraw your consent** to our use of your personal data where we do so in reliance on your consent. Once we have received notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

(f) **Request the restriction of use** of your personal data. This enables you to ask us to suspend the use of personal data about you, for example if you want us to establish its accuracy or the reason for using it.

8.2. We are committed to respecting your rights. You may action your rights (as applicable) by contacting us using the details provided below and we will comply with your requests within a reasonable period unless we have a lawful reason not to do so. Requests should be made in writing and to ensure that personal data is dealt with carefully and confidentially the Premier League will require the requestor to provide verification of their identity and all applications must be accompanied by copies of at least two official documents, which show your name, date of birth and current address (for example, driving licence, birth/ adoption certificate, passport, recent utility bill).

8.3. Note: in responding to such requests, we will explain the impact of any objections, restrictions or deletions requested, which may be significant if our use of your personal data is necessary for you to fulfil your role or relationship with the Premier League.

8.4. We will not charge you a fee to exercise your rights unless your request for access is clearly unfounded or excessive, in which case we may charge you a reasonable fee. Alternatively, we may refuse to comply with the request in such circumstances.

9. **Contact us**

If you have any questions about this privacy policy or how we handle your personal data, please
contact the Data Protection Lead using the following contact details:

Premier League Data Protection Lead  
The Football Association Premier League Limited  
30 Gloucester Place,  
London, W1U 8PL  

dataprotection@premierleague.com

10. Complaints

You also have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK data protection authority. The ICO’s contact details are as follows: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; Tel: 0303 123 1113 (local rate) or 01625 545 745; https://ico.org.uk/global/contact-us/