

Premier League Charitable Fund Privacy Policy

In this Privacy Policy, terms such as "we", "us", "our" or similar expressions shall mean the Premier League Charitable Fund ("PLCF").

We take your privacy very seriously and are committed to protecting your personal data (meaning any information about you from which you can be identified). This Privacy Policy explains what personal data we collect when you: access the PLCF webpage, currently situated at <https://www.premierleague.com/communities/plcf>, contact us for support, provide financial details to us for payments (including but not limited to grants and funding) or engage in our social media content via the Premier League, including @PLCommunities and @PLPrimaryStars via Twitter, training, webinars or other events, programmes or initiatives run by us; and/or when you otherwise interact, engage or communicate with us (the "Services"). It also explains how we may use this data, and what rights you have in relation to such data.

For information on how the Premier League collects, use and store personal data relating to players (including English Football League (EFL) players) and other people associated with them and the Premier League (for example, coaches and scouts) please refer to our [Player and Related Persons Privacy Policy](#).

We also have a separate [PLCF Safeguarding Policy](#). Please read any other privacy notices 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.

If you are aged 12 or under (a child), or you are reading this on behalf of a child for whom you have parental responsibility, please refer to [11. SAFEGUARDING, CHILDREN AND PRIVACY](#).

We keep our privacy practices under review and may change this Privacy Policy from time to time by posting changes on the Services or otherwise notifying them to you. This version of the Policy is dated December 2021.

Please read this Privacy Policy carefully:

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1. BACKGROUND

We are a "**controller**" under the General Data Protection Regulation (the GDPR, including as adopted under UK law after the end of the Brexit transition) and other applicable data protection legislation (**Data Protection Law**). This means we are responsible for deciding how we use the personal data that we collect about you and, in accordance with the Data Protection Law, we will ensure that the personal data we hold about you is, at all times:

1. used fairly, lawfully, and transparently;
2. collected for limited, specific purposes only;
3. adequate, relevant to and limited to what is necessary for those purposes;
4. kept accurate and up-to-date;
5. not kept for longer than is necessary; and
6. held securely.

We shall be accountable for and able to demonstrate our compliance with our obligations under the Data Protection Law, and this Privacy Policy is one of the ways in which we do that.

We have appointed a Data Protection Lead to oversee compliance with this Privacy Policy and our data protection compliance activities. The Data Protection Lead can be contacted at dataprotection@plcf.co.uk.

2. PERSONAL DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified. We may collect, store, transfer and use various types of your personal data:

- **Identity Data:** We will ask you to provide identification information when we provide elements of the Services: name, age, gender, job details, dietary requirements, medical information and emergency contact details.

- **Contact Data:** When we want to communicate with you, or you with us (including but not limited to our Services), we use your name, job details, email address, emergency contact details, telephone numbers and location (country/place of residence).

- **Demographic Data:** on some occasions, we may ask you to provide demographic and background information when we provide elements of the Services, including: sexual orientation, ethnicity, gender, age, details of your religion or belief, any disability or medical information, details of any history of pregnancy or maternity and

any other information you may wish to share with us. Please refer below to Sensitive Personal Data.

- **Media Data:** We use images from photographs and video footage of coaches, attendees, participants and Club Communication Organisation (**CCO**) staff and other media content created by us (or on our behalf) at PLCF events and the Services, or as provided by you for our use. Some images and video footage will also be used by the Premier League and other stakeholders in printed or electronic media. Please refer to 5. DISCLOSURE OF YOUR PERSONAL DATA. Not all of the list above will necessarily apply to you - it depends on your use of the Services and your particular interaction and communications with us. Please refer to 4. HOW AND WHY WE USE YOUR PERSONAL DATA below. There are also “special categories” of more sensitive data about you such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientations, political opinions, trade union membership, information about your health and genetic and biometric data (“**Special Category Data**”) and personal data relating to criminal convictions and offences (“**Criminal Offence Data**”) which require a higher level of protection (collectively referred to in this Policy as “**Sensitive Personal Data**”). We do not regularly collect, use or store such Sensitive Personal Data but in some circumstances we may need to do so.

3. HOW WE COLLECT YOUR PERSONAL DATA

You provide us with your personal data when you:

- access, enrol in, use or request to use the Services;
- request information, marketing and other communications to be sent to you;
- enter a competition, promotion or survey;
- complete surveys or forms or provide us with your feedback; and
- otherwise interact or correspond with us (including via interviews, email, social media or telephone).

In connection with some elements of the Services we also receive additional personal data about you from other organisations who have collected personal data from you, such as our member football clubs (**Clubs**), CCOs, other footballing organisations (such as the **FA** or

EFL)) and data collected on our behalf at Premier League events. We may also receive personal data as part of the legal processes we undertake to protect our Services and our intellectual property, such as our brand or media rights, or those of our partners.

We also use third party tools to help us manage and analyse our social media presence, and report on comments, mentions and other content that is posted about us on social media sites and other public channels and forums. These third parties' activities, and their information collection and sharing practices, are subject to the terms of the relevant social media site, channel or forum. We will use this information in accordance with this Privacy Policy.

4. HOW AND WHY WE USE YOUR PERSONAL DATA

We will only use your personal data where Data Protection Law allows us to. Data Protection Law says we can collect and use personal data on the following bases:

1. it is necessary for us to be able to **perform an agreement** with you.
2. it is necessary for our **legitimate interests** (and your interests and fundamental rights do not override those interests);
3. if we have your **consent** (which you can withdraw at any time); or
4. to comply with a **legal obligation** i.e. rules laid down by courts, statute or regulation.

Data Protection Law says we can only collect and use your Sensitive Personal Data where an additional basis applies: for reasons of substantial public interest, including when preventing or detecting unlawful acts or in connection with our regulatory and oversight functions in sport; in connection with legal claims; cases where you have made the data public yourself; or where you have given explicit consent.

Accordingly, we lawfully use your personal data in the following ways:

Delivering the Services: We use the Identity, Contact, Demographic and Communications Data so that we can deliver the Services to you in an effective, efficient and accurate way. Without it we would not be able to deliver a service to you or respond to issues with these Services that are identified by us or you. Therefore, we use this data on the basis that it is necessary for us to be able to perform our agreement with you (i.e. the terms and conditions of the relevant Services) and for our legitimate interests of delivering the Services in this way.

Operating the Services: We use Identity Data and Contact Data to assist in security and fraud prevention, and/ or to facilitate our response to a legal process. Therefore, we use this data on the basis that it is necessary both for our legitimate interests in protecting the Services in this way and in order that we can comply with a legal obligation.

Media coverage: We use the Media Data together with Identity and Contact Data for PLCF and Premier League-related publishing and media coverage. Except where you are not the

subject of the Media Data, for example in general crowd shots, we will seek your consent and provide you with information about our intended use of such information.

Surveys, competitions and promotions: We use Identity Data, Contact Data, Media Data and Marketing/Communications Data and any other personal data related to the entry (for example, a photograph) in order that we can administer and operate surveys, contests, prize draws, competitions or other promotions including selecting the winners, delivering the prizes and publishing the results (as required by UK advertising regulations). Therefore, we use this data on the basis that it is necessary for us to be able to perform our agreement with you (i.e. the terms and conditions of the relevant promotion) and in order that we can comply with a legal obligation. If we want to use the personal data for any other purpose we will notify you and, if necessary, seek your consent at that time.

Marketing communications: We use the Identity Data, Contact Data and Marketing/Communications Data to inform CCO staff of the PLCF's newsletter and updates. OPT-ING OUT: You can opt-out of marketing communications from us at any time using the unsubscribe link in such communications.

To perform **equal opportunity monitoring and reporting**.

To ensure **Safeguarding** of vulnerable individuals like children, young people and adults at risk.

To comply with **health and safety and other legal obligations** and uphold our duty of care towards you and other individuals.

To **promote Premier League football** including by publishing or sharing photographs of and information on participants of the Services.

To **generate internal reports** to help develop and improve PLCF Services, events, policies, procedures and strategies.

To preserve **the history of PLCF** and its associated Services, competitions and its impact.

To perform **any other administrative and statistical tasks** required to discharge the PLCF's function as a funder for CCOs.

Other purposes: We may have to use your personal data which we hold to protect your or someone else's vital interests for example to make contact in rare emergency situations. We could also have to use your personal data in connection with legal and regulatory matters such as our maintenance of business records, compliance with external reporting requirements and internal policies and procedures and responses to requests by government, law enforcement, regulators, courts, rights holders or other third parties including in respect of the use or misuse of intellectual property, such as our brand or media rights, or those of our licensees/commercial partners or their parties. Therefore, we use this

data on the basis that it is necessary both for our legitimate interests in protecting, defending and enforcing rights and interests in this way and also so that we can comply with legal obligations.

We will only use your personal data for the purposes for which we collected it as described above, 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 data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

What if you do not want to share your personal data?

Unless otherwise specified above, generally we collect your personal data on a voluntary basis. However, please note that if you decline to provide certain mandatory personal data, you may not be able to access certain Services and we may be unable to fully respond to any inquiries you make.

5. DISCLOSURE OF YOUR PERSONAL DATA

We may disclose or share your personal data in the following circumstances:

Third Party Service Providers. We engage third party businesses to provide services to us or to you on our behalf, such as support for the internal operations of our Services (and related services), training events or support for CCOs. Our service providers may access, receive, maintain or otherwise use personal data on our behalf. Our service providers only use your personal data in accordance with our strict instructions to provide the relevant services and are not permitted to use your personal data for their own purposes, unless authorised by us to do so. Where this is the case you will be notified by us and provided with their privacy policies, so you can understand how they will treat your personal data. For example, we may share medical and dietary information to our Third Party Service Providers to assist us with providing our Services, including but not limited to PLCF events and programmes.

Publicity and media. We may disclose your personal data publicly via the media, social media, our broadcast partners or on the Services. For example, when sharing a comment or opinion you have provided such as when you appear at a PLCF run competition, or if you win a competition we may disclose your name and CCO name online, or if sharing photographs and content from PLCF Services. In such cases, we will clearly notify you of the sharing, and you will have the choice not to participate or to otherwise object to such sharing, subject to our other legal obligations.

Legally Required. We may also disclose your personal data if we believe we are required to do so by law, or that doing so is reasonably necessary to comply with legal processes or in the event of a re-organisation of the legal or ownership structure of the Premier League. For example, we share personal data concerning safeguarding issues with CCOs and Clubs, the FA, the Charity Commission and official authorities (as necessary).

Notwithstanding anything else in this Privacy Policy, we may share aggregate or de-identified information with third parties for research, marketing, analytics and other purposes, provided such information does not identify a particular individual and the individual cannot be re-identified.

6. TRANSFERRING YOUR PERSONAL DATA OUTSIDE THE EU

Some countries outside of the European Union (**EU**) do not have laws that protect privacy rights and personal data as extensively as the UK and other countries within the EU. We do not generally or routinely transfer personal data outside of the EU but some of the organisations to which we may disclose personal data may be situated outside of the EU. If we do transfer your personal data outside of the EU, we will ensure that your personal data is protected to a similar degree, in accordance with Data Protection Law. We do this by ensuring one of 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.

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

7. SECURITY 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 (a **Data Security Breach**). 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 use your personal data 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 where we are legally required to do so.

8. LINKS TO OTHER SITES

The Services may contain links to other websites, applications and environments that are not owned or controlled by us (the **Other Sites**). The owners and operators of those Other Sites are responsible for their collection or use of your personal data and you should check their respective privacy policies. Unless specifically referred to otherwise, this Privacy Policy applies to the Services only and not the Other Sites.

9. DATA RETENTION

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for (see [4. WHY WE USE YOUR PERSONAL DATA](#)), including for the purposes of satisfying any accounting, reporting or other legal requirements, in accordance with our Data Retention Policy.

To determine the appropriate retention period, we review - in addition to the purposes of use and how we can achieve them - other relevant factors such as the nature and scope of the personal data, the potential risks to data subjects from a Data Security Breach, and the applicable legal requirements, for example the limitation period for which legal claims can be made in court.

For example, all CCO personnel details who have left their organisation are deleted from PLCF systems within one year.

10. YOUR RIGHTS

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

- **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 using it lawfully, provided always that this does not adversely affect the rights and freedoms of other people;
- **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;
- **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 use 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 our use (see below);
- **Object to use** of your personal data where we are relying on our legitimate interests (see above) and there is something about your particular situation which makes you want to object to our use on this ground;
- **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 use your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law;
- **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; and
- **Request the transfer** of the personal data you have provided, on the basis of consent or for a contract with us, to you or a third party where technically feasible.

We are committed to respecting your rights. You may action your rights (as may be 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 we 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).

In responding to such requests, we will explain the impact of any objections, restrictions or deletions requested.

We will not charge you a fee to exercise your rights unless your request 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.

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/>

11. SAFEGUARDING, CHILDREN AND PRIVACY

It is important to us that children can enjoy our Services in a responsible manner. We encourage parents and guardians to supervise their children's online activities by, for example, adopting control tools available from online services and software suppliers that help provide a child-friendly online environment including by preventing children from disclosing their personal data online without parental permission.

If you have parental responsibility and would like to review any personal data 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 data or if you have any questions about our Privacy Policy or practices, you may contact us at dataprotection@plcf.co.uk.

The PLCF takes its duty to safeguard vulnerable people (children and adults at risk), seriously, by collecting and analysing records of incidents and allegations of abuse, exploitation or inappropriate conduct, by reference to the law. Please note that we may collect and process your personal data (including from public sources) without your knowledge or consent where this is required and/ or permitted by law.

12. CONTACT US

If you have any questions about this Privacy Policy or how we handle your personal data, please contact us using the following contact details:

Premier League Charitable Fund Data Protection Lead
The Football Association Premier League Limited
Brunel Building
57 North Wharf Road
London
W2 1HQ

dataprotection@plcf.co.uk
(0)207 864 9000