

FFCF PRIVACY POLICY

When does this policy apply?

This privacy policy explains how Fulham Football Club Foundation ("FFCF") uses personal data that you provide or which FFCF collects and holds about you when you use its official websites and/or other services. FFCF is the data controller of this information for the purposes of this policy. FFCF's Senior Information Officer is Peter Limbert, who is contactable using the details set out below.

FFCF's websites and services include:

- The Official Fulham FC Foundation Website at <http://www.fulhamfc.com/fulham-fc-foundation>;
 - The Fulham FC Soccer Schools Online sales site at <https://soccerschools.fulhamfc.com/soccerschools> (note that Fulham FC Soccer Schools are primarily delivered through FFCF coaches);
 - The official FFCF social media pages on Facebook, Twitter, Instagram, Snapchat and YouTube;
- (together the "FFCF Official Websites"); and
- The Official FFCF Telephone Sales Line, the number of which is 0208 336 7547.

What types of personal data do we hold?

Information we hold about you may include any one or more of the following types of data:

Account information: When you register to use, purchase or engage with any of FFCF's goods and/or services, the minimum information we will usually ask you to provide is your name, email address, country of residence, telephone number, and year of birth. We may also ask you for additional information depending on the nature of our interaction with you.

Transactional information: When you purchase goods or services from FFCF Official Websites, we will keep a record of your transaction, including what you purchased and when, and any information you provide to us to fulfil the transaction. This may include your name, billing information and telephone number. We will not keep payment card information, except for the last four digits of your payment card number which we keep in case there are any payment disputes or we need to issue a refund. We will ensure that, when handling any information about you relating to a transaction, we comply with the applicable regulations of the Payment Card Industry. When you register to take part in events or fundraise for us we will keep a record of your name, age, email address, postal address, telephone number and relevant health information to ensure that we can understand and evaluate any risks in you taking part in the activity.

Where you purchase services on behalf of a third party (for example, where you book onto a soccer school or other course or service provided by FFCF) we will usually take details of the participants attending the school, course or service, in addition to the transactional information described above. This is in order that we may administer the provision properly and use your details for the other purposes described in this policy.

Information you provide to us in response to a survey: We may occasionally contact you to ask for your feedback on FFCF goods and/or services or goods or services provided by a third party affiliate on our behalf (for example, match day tickets provided by Fulham Football Club) so that we can make them better and more relevant.

Information you provide to us in response to a job advertisement, where you contact us about a potential role at FFCF or where you volunteer with FFCF: We regularly advertise open positions on the Recruitment page of our website at <http://www.fulhamfc.com/recruitment>.

Information from other companies: We may use publicly available postal address lists and the edited electoral roll to ensure that the information we hold about you is accurate or we may use this information, together with general market research information (for example, demographic information), to add to and enhance our database.

Online usage information: If you use FFCF Official Websites we may collect your browser type, the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page. Online usage information may be linked to a unique identifier but we do not link online usage information to named individuals. In order to collect online usage information we use cookies and other similar technologies.

Information you provide to us in order to take part in an activity: In order to take part in FFCF's activities you will need to provide data such as name, date of birth, address, ethnicity, sex and relevant medical information. We will also collect data on attendance and performance.

In most cases, you are not obliged to provide any personal data to us, but in some cases we may not be able to provide goods or services to you unless you provide certain minimum information. By way of example only, where you intend to make a purchase from FFCF, we may need to obtain and process certain information about you in order to enter into and perform the contract of sale with you.

The purposes for which we use your information

The legal basis under which FFCF will process your personal data is one or more of the following:

- To allow us to enter into and/or perform our contract with you*;
- To enable us to comply with legal obligations**;
- To pursue legitimate interests of our own or those of third parties (provided that your interests and fundamental rights do not override those interests) ***; and/or
- With your consent. For the avoidance of doubt, we will only use your information for marketing purposes (where such consent is necessary) where we have your consent****.

Further details of how we will process your personal information are listed below. We have indicated by asterisks the legal basis on which we are processing or will process your personal information.

Contract performance* / **: FFCF may use account information and transactional information data, as necessary, to carry out or perform any contract which you may have entered into with us, including contracts for the purchase of courses and any other services, merchandise and other products. We also use this information to communicate with you and handle your enquiries regarding these contracts. If you order FFCF goods, products or services for another person (for example, match tickets for tour groups) we may ask you for their personal information and we will use this to provide the services you have ordered. Please ensure that you have their permission for us to process this data before providing it to FFCF.

- Legal obligations**: FFCF retains records of all of its financial transactions with you in order to comply with its legal obligations to maintain adequate accounting records. FFCF may use (and disclose) the information it holds about you in order to comply with any investigative demand, court order, or a request for cooperation from a law enforcement or other government agency.

- Recruitment/engagement***: If you apply for a job, register to be a volunteer or apply for a work experience placement with FFCF we may use your information for the purposes of recruitment and selection, corresponding with you and for equal opportunities monitoring. If you consent (see **** below) we may also retain your details in order that we may contact you if we believe you may be suitable for any further opportunities with FFCF.

- Marketing with your consent (where consent is necessary)****: If you have consented to it (where consent is necessary) FFCF may contact you electronically with news and offers from FFCF, its affiliates, Fulham FC's official sponsors (an up-to-date list of which is at www.fulhamfc.com/sponsorship/sponsors) which we think may be of interest to you. You have the right to withdraw your consent at any time, by emailing foundationinfo@fulhamfc.com.

- Other purposes***: FFCF will analyse information it holds about you to identify trends and preferences about its customers and to get a more detailed and informed picture of how its customers are using FFCF's products and services. We do this to make better strategic decisions about FFCF and its products and services so that we can improve the way we market and provide products and services to you and FFC supporters generally. FFCF may also use online usage information about you to administer and improve the function and content of the FFCF Official Websites, including to ensure that content is presented in the most effective manner for you and your device and browser, to allow you to participate in interactive features when you choose to do so and to keep our online services safe and secure. FFCF may also use the information it holds about you if required to protect the rights, property, or safety of FFCF, customers or others.

FFCF will not carry out any automated decision-making using information it holds about you.

Disclosure of your information

Affiliates: Information held by FFCF may be used by affiliates of FFCF for the purposes set out in this policy, where you have consented to this. Our affiliates include the Fulham Football Club, Union Jax LLC and those businesses which share common ownership with FFCF. This may include providing them with your personal information so that they can provide you with information about their products and services that may interest you, where you have consented to this.

Sponsors and partners: FFCF does not share your personal data with our sponsors and partners, but we may: (i) share aggregate/anonymised information which is based on this information with existing and potential sponsors and partners; and (ii) if you have consented to the same, send you information about the products and services of our partners and sponsors in our marketing communications.

FFCF suppliers and sub-contractors: FFCF may share your information with suppliers and sub-contractors from time-to-time in order that they can process it on FFCF's behalf for the purposes set out in this privacy policy. However, where we do so we will put in place suitable measures in order to protect your information. These third parties may include (but may not be limited to): (i) call centre providers; (ii) IT service providers (such as hosting providers); (iii) mailing houses or document storage companies; (iv) delivery services; (v) analytics and search engine providers; (vi) credit reference agencies; (vii) payment processing companies; and/or (viii) e-commerce platform providers.

FFCF Funders: FFCF may share your information with funders who have provided finance to FFCF in order to deliver services to the local community or to run a particular programme.

Disclosures for legal reasons: FFCF may also disclose the information it holds about you to those persons that have a reasonable need to know such information, if it believes in good faith that this is necessary: (i) to establish, exercise or enforce its legal rights, including contractual rights; (ii) to defend itself against a legal claim; (iii) report a crime or prevent a crime (for example, ticket touting); (iv) to prevent harm to any individual or any property (including intellectual property, for example if you misuse images or videos or any other content FFCF makes available to you); (v) to satisfy our statutory and/or regulatory obligations relating to safeguarding; or (vi) to prevent fraud (for example, payment card fraud) or for credit risk reduction.

Business transfer: If FFCF sells or buys any business or assets, your personal data may be disclosed to the prospective seller or buyer of such business or assets so that they can carry out due diligence in respect of the sale or purchase, but only if FFCF has taken reasonable steps to ensure the security and confidentiality of that information. If FFCF (or substantially all of its assets) is acquired by a third party, personal data held about donors or users of its goods, products or services will be one of the transferred assets.

Transfer outside the EEA: Your information may be transferred to or accessed outside of the EU by FFCF's affiliate, the Jacksonville Jaguars LLC, who are based in the USA. Your information will only be transferred for the internal purposes of FFCF and will not be used for marketing unless you have consented to this. Jacksonville Jaguars have entered into the standard contractual clauses approved by the European Commission to safeguard your personal data and comply with applicable data protection laws.

How do we keep your information secure?

FFCF is committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure of personal data, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information we collect. We regularly perform testing of these procedures and have an appropriate information recovery and data breach procedures in the event that we encounter any difficulties.

How long do we keep your information?

FFCF will retain your personal data for as long as necessary for the purposes it is collected as set out in this policy and for any longer period necessary for it to comply with statutory retention obligations and/or for the purposes of defending or making legal claims. Examples of some of our retention periods are set out below:

FFCF stores:

- its financial transactions with you for six years in order to comply with its obligations to maintain adequate accounting records;
- its contracts with you for six years so that it has appropriate evidence in place if there is a claim for breach of contract made within the statutory limitation periods;
- job applications and CVs for up to six months, unless you have consented to your details being held on file in case other suitable opportunities arise;
- your account information until you close or delete your account/profile (at which point we would also delete any information from other companies or market research which we have appended to your account/profile);
- any market research we have undertaken (and which is not appended to your user account) for 3 years. Note that we will retain aggregated market research information (by which you cannot be identified) on an ongoing basis for internal purposes; and
- save as set out above, information you post online and/or online usage information for 3 years if it is on FFCF Official Websites.

If any information falls into more than one category then the longer storage period will apply.

Your rights

You have several rights under applicable data protection laws (unless an exemption applies), which we have summarised below. These rights can be exercised by contacting FFCF using the details given below in this policy.

You have the right to:

- ask us not to process your personal data for direct marketing purposes;
- request access to personal information held about you and a copy of it;
- obtain, without undue delay, the rectification of inaccurate or incomplete personal data;
- obtain, without undue delay, erasure of your personal data in certain circumstances, for example if FFCF's processing of your personal data is no longer necessary for the purpose for which we collected it;

- restrict the processing of your personal data in certain circumstances rather than having it erased;
- object to the processing of, personal data in certain circumstances;
- receive personal data, which you have provided to FFCF, in a structured, commonly-used and machine-readable format and transmit that personal data to another data controller, or have FFCF do so on your behalf where technically feasible;
 - be informed about any use of your personal data to make automated decisions about you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing; and
- lodge a complaint about the way in which your personal data is being used to a supervisory authority.

Parental consent / supervision

One of the FFCF's primary aims is to engage with children and young persons in the community. We are keen to ensure that when we interact with children and young persons we do so responsibly. We would therefore ask that parents and guardians supervise their children when they are online and that children under 18 do not submit personal information or content to the FFCF, make purchases of the FFCF's goods, products or services, or take part in FFCF events, without the consent of their parent or guardian. FFCF reserves the right to take reasonable measures in order to verify the existence and/or validity of parental consent.

How you can contact us?

If you would like to contact FFCF about this policy or any of the legal rights outlined in it, you can contact us by email at foundationinfo@fulhamfc.com or write to:

Fulham Football Club Foundation
Motspur Park
Training Ground
New Malden
Surrey KT3 6PT.

In either case, your correspondence should be marked for the attention of the Senior Information Officer.

Changes to our privacy policy

Any changes we make to this privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this privacy policy.

This privacy policy was last updated in April 2018.