



Magpies Trust

Privacy Policy

Review date: June 2024

Signed:

A handwritten signature in black ink, consisting of a stylized 'S' followed by a 'V'.

(CHAIR)



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1. Introduction

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership and/or involvement with us. This notice applies to you if you have registered to become or are a member of our club. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we, our or us** in this privacy notice are to the Magpies Trust.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws [as we not required to do so], but our Board is responsible for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

2. Personal information we may collect from you

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth
- gender;
- membership start and end date;
- Information provided by you on how you watch CFC football matches that may be relevant to your membership services
- records of your interactions with us such as meetings, telephone conversations, emails, opinion surveys and other correspondence and your instructions to us;
- use of, and movements through, our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events hosted by us;
- your marketing preferences so that we know whether and how we should contact you.
- any disciplinary and grievance information;

3. Special categories of personal information

We do not hold any special categories of personal information as defined by the UK General Data Protection Regulation (UK GDPR).

4. Where we collect your information

We typically collect personal information about our members when you apply to become a member of the Trust, when you renew that membership (usually annually), when you request changes to be made at other times, when you purchase any services or products we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.



Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you	<p>All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.</p> <p>No credit card information is ever stored on our servers. We use Stripe.com, one of the most secure and reputable payment processors available. All card numbers are encrypted on disk decryption keys are stored on separate machines. None of Stripe's internal servers and daemons are able to obtain plaintext card numbers. Stripe's infrastructure for storing, decrypting, and transmitting card numbers runs in separate hosting infrastructure and does not share any credentials with Stripe's primary services (API, website, etc.)</p>	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you information that relates to your membership benefits package	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events, products and information about our commercial partners	Contact details and marketing preferences.	We provide the opportunity to opt out of some of these services
To answer your queries or complaints	Contact details and records of your interactions with us	We provide the opportunity to opt out of some of these services



To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events, products and information about our commercial partners	Contact details and marketing preferences.	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our Trust club and in some cases we may have legal or regulatory obligations to retain records.
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand your opinion on football related supporter interests, policies and campaigns that we undertake on your behalf	Records of your supporter characteristics and any responses that you may make to our surveys, questionnaires or other specific enquiries that you may respond to.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the Trust, our activities, events and membership packages.	Images in video and/or photographic form.	Where an individual may be identified we will make best efforts to seek their express permission.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect	We have a legitimate interest in doing so in the event of a member bringing the Trust into disrepute and to ensure the effective management of any disciplinary hearings, appeals and adjudications.



For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

5. Direct marketing

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about products and services related to your membership that we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by updating your preferences in your dedicated preference centre that can be accessed via the "My Profile" section in the "My Account" area. Alternatively, you can also unsubscribe from our marketing by clicking on the unsubscribe/preference centre link in the marketing messages we send to you.

6. Disclosure of your personal information

- We may share personal information with the following parties:
- Any party approved by you.
- Any regional or national football supporter organisation to which we may be affiliated to allow them to properly administer the collective interests of football supporters
- Other service providers: for example, email marketing specialists, payment processors, data analysis CCTV contractors, promotional advisors, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
- Our supply chain partners and sub-contractors, such as couriers, import/export agents, shippers;
- Our Commercial Partners: for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by them as part of your membership package (unless you have opted out through your Direct Marketing preference settings)



7. How long do we keep personal information for?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of [6] years after your last contact with us or from the end of your membership. Exceptions to this rule are:

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you through our membership portal] Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

8. Your rights in relation to personal information

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.



9. Changes to this notice

This privacy policy will be reviewed annually.

When we change this notice in a material way, we will update the review date at the top of the document. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

10. Contacting us

In the event of any query or complaint in connection with the information we hold about you, please use the details below:

Contact details

Registered Office: Ashlyn, Moss Lane, Whittle-le-woods, Chorley, PR6 7DB

Email: info@magpietrust.org

Website: www.magpietrust.org

Facebook: www.facebook.com/MagpiesTrust1883

Twitter: www.twitter.com/MagpiesTrust