## PRIVACY. YOUR DATA. YOUR TRUST. Our Commitment To You

You are at the heart of everything we do. Our goal is to maintain your trust and confidence by handling your personal information with respect and putting you in control.

It's important that you know what personal information Honeybourne Harriers (known here as "we" or "Honeybourne Harriers") collects about you, and how we use it.

We've done our best to make our explanations short and easy to understand. But, if you'd like further information, or have any questions, please contact our Data Protection Officer using the details in the 'Contact' section below.

If we ever make any major changes to our privacy practices, we'll let you know. If necessary, we'll also ask for your permission.

#### **Our Privacy Promise**

#### **Privacy Notice**

Our Privacy Notice has been designed with you in mind. How the notice applies to you will depend on the way in which you interact with us. For example, if you:

- 1. purchase a product from us, we will use the information you provide us to fulfil both our obligations to you in delivering that service, and, where permitted, keep you up to date about other events that may be of interest to you; and
- 2. when you browse our sites, we use cookies to tailor your experience and hopefully provide you with a seamless experience.

Your choices and rights under each scenario are explained in more detail below, scroll down to read the full policy.

## What Information We Have & Where We Get It

We collect and store different types of information about you when you create an account, buy products, contact us, and use our websites, apps and social media.

## How We Use Your Information & Why

We collect and use your information for lots of reasons such as helping you get fit and enjoy the sport you love, sharing news, for marketing and as otherwise required by law.

## Who We Share Your Data With & Why

We may share your information with the Event Partner(s) - such as the Event Photographers, FA, Event Organisers, League, Event Venue - as well as other third parties associated with the service provided.

## Your Choices & Rights

Among other rights, you can choose whether to receive marketing from us. You also have the right to access the information we have about you.

## **Looking After Your Information**

We're always taking steps to make sure your information is protected and to delete it securely when we no longer need it.

## **Contact Us**

If you have any questions or feedback about this notice, or how we handle your information, get in touch with us.

## What Information We Have & Where We Get It

- When you register your child with Honeybourne Harriers, we will collect your contact information to ensure yours/your Childs game time is met by you knowing where to be and at what time. Under the terms of legitimate interests we may collect this in advance using information the Event Organiser holds on you already.
- When you register, buy a product or agree to have you or your child photographed by us, we will collect your information which depending on service we are providing, may include your contact and billing information.
- When you use our websites or apps, we collect information such as the browser and device you're using, your IP address,

your location, the site you came from, what you did and didn't use our site/app for, or the site you visit when you leave us. For more information on how we collect this information, see our Cookies Policy.

- When you use a social media feature within our website or apps, and you post to social media platforms, the social media site will provide us with some information about you.
- If you have accessibility requirements, we want to make sure you have the best experience when attending events. To do this, we need to collect details of your requirements (which may involve you providing information about your mental or physical health).
- In the few instances where we collect personal information from children, we always seek parental consent and will only ever collect such information for the purposes specified when we collect it.
- Should you or your child be "at risk" or of "protected" status, please inform us in advance and we can advise you of the steps we take to maintain the security of these photos/products.

## How We Use Your Information & Why

## 1. For the performance of our contract with you

We use your information when you enter into a contract with us (for example play football or attend events) so we can:

- process your request to play
- take payment, and
- provide you with club support.

## 2. For our legitimate business interests

- To conduct market research and analysis which helps improve and customise our products and services.
- For our marketing purposes, unless your consent is required for such marketing (see section 3 below).
- To send you customer service emails including booking confirmations and event reminders.

- To prevent or detect unlawful behaviour, to protect or enforce our legal rights or as otherwise permitted by law.
   For example, making sure products get into the hands of the owners/parents/guardians.
- To ensure the security of our and our 'Event Partners' Operations.

### 3. Where you've given your consent

- To contact you with information or offers regarding our upcoming events, products or services – this may be via email, via push and web notifications, via SMS, or social media platforms. You can change your preferences at any time, see "Your choices and rights" section below.
- To provide you with location based services, such as sending you notifications about what's going on around you like special offers from other vendors in relation to the Event such as Nike Training Days.
- To deliver tailored advertising and marketing communications on our websites and apps (see our Cookies Policy for more information).
- To process your health data to meet your accessibility requirements, where specifically required and explicit consent is provided.

### Who We Share Your Data With & Why

- Within the Honeybourne Harriers family of companies who provide services for us such as marketing, profiling, training and technical support.
- Our third-party service providers (such as The FA, league, parents, Schools, other clubs.
- We may share your information with our Event Partners so that they can run the event and for other reasons described in their privacy policies. We will always name the Event Partners when you are named or need to know.
- Government agencies or other authorised bodies where permitted or required by law.
- Any successor to all or part of our business.

## Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. We only use the data you provide to us directly for this purpose and we do not track what other websites you may visit after visiting our site, though in common with most websites, we may register the site which referred you to our site (e.g. a search engine).

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We generally only send electronic marketing - such as Messenger to people who have previously registered with us and this is in our legitimate interests. We will always offer a way out of receiving this marketing when you first register.

Where you have not previously registered with us but have registered your details with us (for example by entering a competition or signing up for a newsletter or buying a Raffle ticket), we will only send you communications if it is necessary to do so.

We may also share certain data with third party social media platforms in order to promote Honeybourne Harriers. We do this by:

• The use of cookies which capture your visits to our website.

## **OPTING OUT**

You can ask us to stop sending you marketing messages at any time by messaging the Club Secretary at any time.

If you opt out of receiving information from us, we will no longer share your email address with social media platforms (see 'External Third Parties' below). However, you may continue to see our ads through them, due to their general demographic targeting. Please check the social media platforms for more detail of how to opt out from seeing these ads.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, or related correspondence, and we will continue to process such data in accordance with this Privacy Policy and only ever as permitted by law.

### Your Choices & Rights

## Your choices

Where you have given us your consent, you can withdraw it by doing the following.

- To stop receiving our marketing you can contact us and we will do it for you.
- To opt out of the use of cookies and tracking tools, please see our Cookies Policy.
- To opt out of location tracking and push notifications, you can change the settings on your device or keep your location off.
- To stop web push notifications, you will need to use your browser settings.
- To object to personalisation you can change your preferences within your account. If this option is not available you can contact us and we will do it for you

# Your rights

You also have rights over how your personal information is used including:

- The right to object to our processing of your data.
- The right to request that your information be erased or restricted from further use.
- The right to request a copy of the information we hold about you.
- The right to correct, amend or update information you have given us (where you have an account with us you can also do this by logging in and updating your information).

 The right to contest any automated decision we make about you. An automated decision is a decision taken without any human intervention which has legal consequences (e.g. credit checking). We don't typically carry out automated decision making but, if we do, we will make it clear where such decisions are being made.

We have put together this table of data use scenarios and the impact of the use of this data:

Purpose/Activity	Type of data	Lawful basis for pro- cessing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (c) Profile	Performance of a contract with you.
<ul> <li>To process and deliver your order, including:</li> <li>1. managing payments, fees and charges; and</li> <li>2. managing your queries through our Customer Service team – this may in- clude record- ing calls to our teams.</li> </ul>	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Financial</li> <li>(d) Transaction</li> <li>(e) Marketing and Communications</li> </ul>	Performance of a contract with you. We may also use some of the data re- lated to your queries for our legitimate interests of ensuring our customer service quality standards are met.
To collect and recover money owed to us in re- spect of your order	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c) Financial</li><li>(d) Transaction</li></ul>	Necessary for our legiti- mate interests (to recover debts due to us).
To carry out fraud assess- ments	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Financial</li> <li>(d) Transaction</li> <li>(e) Technical</li> </ul>	Necessary for our legiti- mate interests of ensuring payments are not fraudu- lent

To process your purchase of a gift voucher from us	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Financial</li> <li>(d) Transaction</li> </ul>	Performance of a contract with you.
To notify you in relation to our legal obligations and documents, including changes to our terms or Privacy Policy	(a) Identity (b) Contact (c) Profile	Necessary for our legiti- mate interests of ensuring our customers are up- dated on these changes.
To help us improve our of- fering to our customers, including asking you to leave a review or take a survey, or provide cus- tomer insights	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Marketing and Communications</li> </ul>	Necessary for our legiti- mate interests (to study how customers use our products/services, to im- prove our offering to our customers, to develop them and grow our busi- ness).
To enable you to partake in a prize draw or competi- tion	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and Communications</li> </ul>	Performance of a contract with you to fulfil the pro- motion and run the com- petition/prize draw. We may also subsequently use your entries for the le- gitimate interests of under- standing our customer base more effectively.
To administer and protect our business and this website (including trouble- shooting, data analysis, testing, system mainte- nance, support, reporting and hosting of data)	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Technical</li> </ul>	Necessary for our legiti- mate interests (for running our business, provision of administration and IT ser- vices, network security, to prevent fraud and in the context of a business reor- ganisation or group re- structuring exercise).
To deliver relevant web- site content, advertise- ments and other market- ing material to you and measure or understand the effectiveness of the advertising we serve to you	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Usage</li> <li>(e) Marketing and Communications</li> <li>(f) Technical</li> </ul>	Necessary for our legiti- mate interests (to study how customers use our products/services, to de- velop them, to grow our business to inform our marketing strategy and to improve our offering to you). Please note that where cookies are used for this purpose, this is covered separately by our Cookies Policy.

To use data analytics to improve our website, prod- ucts/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legiti- mate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy). Please note that where cookies are used for this purpose, this is covered by our Cookies Policy.
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> <li>(d) Usage</li> <li>(e) Profile</li> </ul>	Necessary for our legiti- mate interests (to develop our products/services and grow our business, and to improve our offering to you).

To exercise any of the above rights please complete the change request form. Please note that whilst we will carefully assess every request we receive we may not always have to comply. When this happens, we will explain why.

#### Looking After Your Information

We have security measures in place to protect your information. The security measures we use will depend on the type of information collected.

We only keep your information for as long as required to provide you with the services you request, for the purposes outlined in this policy and for any legal purposes for which we are obliged to keep the information. We will securely delete your information when it is no longer required for these purposes, in line with our company policies.

As a part of a global group of companies, we rely on shared services, some of which are located outside of Europe. At some time, your information may be transferred internationally to our hosted servers. When transferring information in this way, there are strict rules in place to ensure your data is still protected to a high standard. Where we do this, we will ensure that appropriate safeguards are put in place including, where required, one of the mechanisms listed below.

- Standard Contractual Clauses approved by the European Commission
- EU-US Privacy Shield
- Binding Corporate Rules
- Binding Corporate Processor Rules

For more information, or to get a copy of the relevant documentation please contact us.

### Contact Us

If you have any questions about the above, or our approach to privacy, please contact our Club Secretary, the information to do this in on all published documentation and will be in your possession.

There's also the Information Commissioner's Office (ICO) although we encourage you to try and let us help you first.