**What does this policy cover?**

This policy describes how EnjoyFootball (collectively referred to as "EF", “our” "we" or "us") will make use of your data on our website and during your interaction with us online and offline, including data we may process in connection with attending any of our sessions or games, data we may handle if you supply or partner with us or data we use to send you direct marketing.

It also describes your data protection rights, including a right to object to some of the processing which EF carries out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

A number of activities EF carries out are subject to dedicated privacy policies. These will usually be provided on appropriate sites or forms you visit or complete and will be given a specific privacy policy when they register or log into that system. A list of EF privacy policies is set out at the bottom of this policy.

**Summary of how we use your data**

* EF uses your personal data to allow you to use the features in EF content, to administer your online and offline relationships with EF, to manage the safety and security of our venues and events, to comply with EF’s legal obligations and to provide you with EF products, services and other offerings. Some of this information will be provided by you, and others will be generated by EF or provided by third parties.
* Our website may provide interactive features that engage with social media sites, such as facebook and Twitter. If you use these features, these sites will send us personal data about you.
* Where we rely on your consent, such as for direct marketing purposes, or to place cookies, you can withdraw this consent at any time.
* Our privacy policy sets out more details of this processing, including details of your data protection rights, including your right to object to certain processing.

**What information do we collect?**

We collect and process personal data about you when you interact with us and our website, when you purchase goods and services from us, where you visit our venues, when we carry out market research and when you enter our competitions. This will typically be provided directly by you, and may include information you provide on registration or in the process of a purchase, such as your name, address, email address, marketing preferences and payment details. The details being provided by you will be made clear in forms you complete or will be provided directly by you in surveys, in entering competitions or in volunteering information in communications or content you provide us.

**What information do we generate or receive from third parties?**

We may generate or collect information about you ourselves.. In an offline context, we may particularly collect information about you through in completing health and safety records or by keeping access records of our sites.

Sometimes, we receive information about you from third parties. For example, if you login to a site or app using facebook Connect you will be asked if you wish to share information from your facebook account with us. If you use a "like" or a "share" button for a feature on our sites or apps, then the third party will share information with us. If you participate in activities on non-EF sites or apps - such as participating in a facebook application - you may allow us to have access to personal data held by facebook, or other site or app owners.. We may also obtain information about you from third party demographics providers, which we may use to help us better understand our users and send them appropriate offers and information.

If we provide online services to a child where we need parental consent for this, we may ask for a parent's email address, in order to ask for consent.

Where you are participating in an EF event or competition, we may receive information about you from another team member or official responsible for entering you or your team into our competition. This will typically involve basic biographical information, including your contact email address.

**How do we use this information, and what is the legal basis for this use?**

We process this personal data for the following purposes:

* To fulfil a contract, or take steps linked to a contract: this is relevant where you make a purchase from us or enter a competition we run. This includes:
	+ verifying your identity;
	+ taking payments;
	+ communicating with you;
	+ administer the competition (where relevant); and
	+ providing customer services and arranging the delivery or other provision of products, prizes or services.
* As required by EF to conduct our business and pursue our legitimate interests, in particular:
	+ we will use your information to provide products and services you have requested and to respond to any comments or complaints you may send us;
	+ we monitor use of our venues,  websites and online services, and use your information to help us monitor, improve and protect our venues, products, content, services and websites, both online and offline;
	+ we use information you provide to personalise our website, products or services for you;
	+ if you provide a credit or debit card as payment, we also use third parties to check the validity of the sort code, account number and card number you submit in order to prevent fraud (see data sharing below);
	+ we process data you provide when you enter into an EF event or competition so that we can administer that competition, communicate with you and ensure eligibility. If this involves sensitive personal data, such as information about disability used to ensure eligibility for a disabled competition, we do this to ensure the integrity of our competition;
	+ we use information you provide as well as information which we have collected about you to investigate any complaints received from you or from others, about our website and venues or our products or services;
	+ we will use data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation); and
	+ we use data of some individuals to invite them to take part in market research.
* Where you give us consent:
	+ we will send you direct marketing in relation to our relevant products and services, or other products and services provided by us and carefully selected partners and sponsors;
	+ we may place cookies and use similar technologies in accordance with our Cookies Policy (see below) and the information provided to you when those technologies are used; and
	+ on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
* For purposes which are required by law:
	+ where we are required to hold or collect personal data to meet legal requirements on us, such as keeping health and safety records, details of purchases or ensuring banned EF are not given access to our venues;
	+ where we need parental consent to provide online services to children under 13. However, most of our websites are not designed for children under 13; and
	+ where in response to requests by government or law enforcement authorities conducting an investigation.

**Withdrawing consent or otherwise objecting to direct marketing**

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests.  You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

**What cookies and/or tracking technologies does EF use?**

When you visit one of our websites, we may also collect, process and use information about you and your use of the website, including any forums you visit and how you arrived at our site. Such information may be collected through "traffic data" and may entail the use of "cookies" or other tracking technologies, IP addresses or other numeric codes used to identify your computer.  For more information on Cookies please click on the link to our [Cookies Policy](http://www.thefa.com/public/cookiepolicy)

*Apple iOS and Android Devices*

By accessing an EF application from these devices you consent to cookies being stored to your device (and other tracking technologies being used to read data from your device) for the following purposes: keeping you logged in, ensuring that an appropriate version of content is presented, analytics and advertising. Many of these cookies and technologies are essential to the operation of the application. It is not currently possible to opt out or remove these cookies (or prevent use of these technologies) from the device without deleting the application.

**Who will we share this data with, where and when?**

We do not share data.

**What rights do I have?**

You have the right to **ask us for a copy**of your personal data; to **correct**, **delete** or **restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don’t have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, where it would infringe the rights of a third party (including our rights)  or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, you can get in touch with us – or our data protection officer – using the details set out below. If you have unresolved concerns, you have the **right to complain** to an EU data protection authority where you live, work or where you believe a breach may have occurred. This likely to be the Information Commissioner’s Office in the UK.

Data that is mandatory is indicated on relevant forms that you complete. Where provision of data is mandatory, if relevant data is not provided, then we will not be able to fulfil your requests to register, make a purchase or otherwise engage with EF. All other provision of your information is optional.

**How do I get in touch with you, or your data protection officer?**

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt out of direct marketing, you can get in touch with Dave Smith dave.smith@enjoyfootball.co.uk.

**Which EF entity is my data controller, and which affiliates might my data be shared with?**

**How long will you retain my data?**

Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract or for a competition, we keep the data for 7 years from your last interaction with us or from when the contract ends.

Where we process personal data to meet legal requirements, we hold this for as long as the law requires.

We hold information relating to visitors to our venues for a month.

Where your data is held on EF systems, then at the end of the retention periods set out above, we will not irrevocably delete your information for another 3 months – your data will be held in an inactive form for this time to ensure that any consequential links across our systems remain intact in the event that your data is removed in a particular location.

Effective Date: This Privacy Policy was updated on 14th May 2018 and is effective as of that date.