

Newcastle United Foundation

Privacy Notice

April 2024

Name	Privacy Notice
Effective Date	18/04/2024
Next Review Date	April 2025
Drafted By	Senior Digital Coordinator
Approved by Board	18/04/2024
Owner	Newcastle United Foundation

1 Important information and who we are

Introduction

Welcome to Newcastle United Foundation's privacy notice. Newcastle United Foundation respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Purpose of this notice

This privacy notice aims to give you information on how Newcastle United Foundation collects and processes your personal data.

It is important that you read this privacy notice together with any other privacy notice or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and is not intended to override them.

Data Controller

Newcastle United Foundation is the data controller and is responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

Data controller contact details

If you have any questions about this privacy notice or our privacy practices, or would like to exercise your legal rights, please contact us in the following ways:

Subject access request: Download form [here](#)

Email address: foundation@nufc.co.uk

Postal address: NUCASTLE, Diana Street, Newcastle-upon-Tyne, NE4 6BQ

Changes to this notice and your duty to inform us of changes

If our privacy notice changes in any way, we will place an updated version on [this page](#). Regularly reviewing the page ensures you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2 Your legal rights

Under UK Data Protection Laws (UK General Data Protection Regulations and the Data Protection Act 2018) you are able to find out what information is held about you, under certain circumstances. This is known as "right of subject access".

If you want to see or receive a copy of your information, you can submit a subject access request, a form is available to download above to help guide you through the process. You can also contact us on the details provided above. In certain circumstances access to your information/records may be limited, if such an instance occurred, we would provide reasons for this.

You may have the right to erasure of your personal information held by us, in certain circumstances. You also have the right to withdraw consent at any time, where consent has been given.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any unauthorised person. We may also contact you to ask you for further information in relation to your request to expedite our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

3 The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you depending upon the nature of our interaction with you. For details as to the types of personal data we collect and use, please see heading 5 (How we use your personal data) below.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you but we will notify you at the time if that is the case.

4 How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you register for a programme, express interest in an event or fundraising.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- Third parties or publicly available sources. We will receive personal data about you from various third parties [and public sources] for example, your school, your previous employer(s), the police etc.

5 How we use your personal data

We will only use your personal data when the law allows us to.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so under the UK General Data Protection Regulation (GDPR). We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific lawful basis we are relying on to process your personal data where more than one basis has been set out in the table below.

Purpose/activity	Type of data	Lawful basis for processing, including legitimate interest
Marketing and fundraising	Name, email address,	Article 6 (1) (a) the data subject has given consent to the processing of his or her personal data for one or

	telephone number, address and linked organisation (if applicable)	<p>more specific purposes</p> <p>Article 6 (1) (f) processing is necessary for the purposes of the legitimate interests pursued by the data controller</p>
Collecting donations	Name, contact details, residential address, payment information	<p>Article 6 (1) (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p> <p>Article 6 (1) (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p>
To administer an application process for employment	Name, residential address, email address, telephone number, national insurance number, whether any adjustments are needed for attendance at interviews for access requirements etc., whether they have worked with or for Newcastle United Foundation before, whether they are related to anyone at Newcastle United Football Club and if so	<p>Article 6 (1) (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p> <p>Article 6 (1) (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Article 6 (1) (f) processing is necessary for the purposes of the legitimate interests pursued by the data controller</p> <p>Article 9 (2) (b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject</p>

	<p>the name and job title, employment history (including salary), gaps in job history, education history, membership of professional bodies (not trade unions or political parties), personal statement, reference, details on right to work in the UK. Separate equal monitoring and self-declaration forms (not mandatory). Self-declaration form collects criminal history. Equal monitoring form collects EDI information. Both are collected as part of application but only opened if the individual is considered for short-listing / interview.</p>	
Delivering in	For secondary	Article 6 (1) (a) the data subject has given consent to

<p>schools</p>	<p>schools: Name, address, date of birth, gender. Special category data: ethnicity, disability, school attendance and achievement data</p> <p>For primary schools to deliver the primary stars and PHSE programmes: Name, gender, ethnicity, class size, disability information, which class and school.</p>	<p>the processing of his or her personal data for one or more specific purposes</p> <p>Article 6 (1) (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Article 6 (1) (f) processing is necessary for the purposes of the legitimate interests pursued by the data controller</p> <p>Article 9 (2) (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes</p> <p>Article 9 (2) (d) processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects</p> <p>Article 9 (2) (g) processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject</p>
<p>Community based programme delivery</p>	<p>Data collected can include: name, address, telephone</p>	<p>Article 6 (1) (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p>

	<p>number, email address, residential address, gender, date of birth, emergency contact details, next of kin, allergies, marketing consent, photo consent, qualifications, employment status.</p> <p>Special category data: ethnicity, health information, disability information, accessibility information, risk factors associated with a child (if applicable) - SENs etc</p> <p>Criminal Convictions data (when referrals are from the police, they do checks on the individual participant as well as family</p>	<p>Article 6 (1) (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p>Article 6 (1) (f) processing is necessary for the purposes of the legitimate interests pursued by the data controller</p> <p>Article 9 (2) (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes</p> <p>Article 9 (2) (b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject</p> <p>Article 9 (2) (d) processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects</p> <p>Article 9 (2) (g) processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the</p>
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	information and this information can be shared.)	interests of the data subject
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Cookies

When we provide services, we want to make them easy, useful and reliable. Where services are delivered on the internet, this sometimes involves placing small amounts of information on your device, for example, computer or mobile phone. These include small files known as cookies. They cannot be used to identify you personally.

These pieces of information are used to improve services for you through, for example:

- Remembering if you have activated our accessibility toolbar
- Enabling a service to recognise your device so you don't have to give the same information several times during one task
- Recognising that you may already have given a username and password so you don't need to do it for every web page requested
- Measuring how many people are using services, so they can be made easier to use and there's enough capacity to ensure they are fast.

You can manage these small files yourself and learn more about them [here](#). You can also reject cookies by clicking "Learn more and customise" when you visit our website, however, certain functions on the website may not work as expected.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Third-party marketing

We will request your express opt-in consent before we share your personal data with any third party for marketing purposes.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible

with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. 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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6 Who we might share your data with

We may share your personal data with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7 International transfers

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring we have the correct safeguards in place. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

8 Data security

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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our written instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9 Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.