



## Blackpool Football Club Privacy Policy

### (“Privacy Policy”)

#### 1. Introduction

1.1 We are Blackpool Football Club Limited, a limited company registered in England (company number 48409) whose registered office and address for correspondence is at Bloomfield Road, Seaside Way, Blackpool, FY1 6JJ. References to "we", "us" and "our" in this policy are all references to Blackpool Football Club Limited.

1.2 We are committed to ensuring that all personal data we hold is treated properly and in accordance with applicable data protection legislation. We are registered as a data controller with the Information Commissioner's Office and our registration number is Z6178297. In accordance with applicable data protection legislation, we are required to explain to you how we will treat any personal data which we collect from you.

1.3 Whenever you submit your information to us in connection with our products and services or your use of our shop and ticketing (**[shop.blackpoolfc.co.uk](http://shop.blackpoolfc.co.uk) and [eticketing.co.uk/blackpoolfc](http://eticketing.co.uk/blackpoolfc)**) sites, whether it be by using and/or registering to use either site, by email, over the telephone or by any other means, you acknowledge that we will collect and use such information in accordance with the terms of this Privacy Policy. If you opt in when requested by us, you will also be opting to be added to our mailing list. Please see section 3 below for further information if you no longer wish to receive mailings from us.

1.4 If we change any of the terms contained within this Privacy Policy we will post the revised policy on each site in the relevant privacy policy and in our customer charter.

1.5 Please note that:

a) if you are a season ticket holder, member or purchase any commercial package from us, we will collect additional information from you in connection with your season ticket, membership or package (as the case may be).

1.6 You have the right to lodge a complaint with the Information Commissioner's Office (“ICO”) if you have any concerns with regard to the way in which we process your personal data. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

1.7 You warrant that any information you supply to us is accurate and up to date (whether or not the information is about you), that you will inform us if any information that we hold about you requires updating, and that if you submit a third party's details to us, you have that third party's permission or an alternative legal justification for doing so.

## 2. What information do we collect and how we use it?

2.1 If you wish to purchase a season ticket, membership, any commercial package, or register to use/make purchases from our ticketing or shop sites, you will be required to provide us with the following personal data:

- (a) **Identity Data** - including name, date of birth and gender;
- (b) **Contact Data** - including postal address, billing address, email address and telephone numbers;
- (c) **Financial Data** - including bank account (for payment plans) and payment card details;

2.2 By doing so, you also allow us to keep a record of your:

- (a) **Transaction Data** - including details about payments to and from you and other details of products and services you have purchased from us; and
- (b) **Profile Data** - including your username and password, purchases or orders made by you, your interests, contact and marketing preferences, feedback and survey responses.

2.4 We may use the above information about you where necessary for our legitimate interests in the following ways (so long as our interests are not overridden by the impact on you):

- (a) to develop our systems and services and ensure that content from the Sites is presented in the most effective manner for you and your electronic device used to access the Sites;
- (b) to provide you with information or services that you request from us or access via the sites;
- (c) to monitor your compliance with our Terms of Use;
- (d) to notify you about changes or prospective changes to our services and/or either site;
- (e) to carry out market research so that we can improve the products and services we offer (please note that you have the right to opt-out of receiving or participating in our surveys at any time); and

2.5 If you purchase any items using our ticketing and shop sites, we will use your identity data, contact data and financial data for the purposes of performing our related contract of sale or supply with you (e.g. to take payment from you in respect of such items and to deliver such items to your selected delivery address).

2.6 If you correspond with us (e.g. using email), we may retain the content of your correspondence together with your contact details and our responses where necessary for our and your legitimate interests in order that we can appropriately manage your relationship with us, and to reply to your correspondence

2.7 Where we need to collect personal data in connection with any services or products which you request or order from us and you fail to provide that data when requested, we may not be able to provide such services or products or perform any related contract that we have or are trying to enter into with you

### *Match Photography and Filming*

2.8 Please note that we may also record footage of individuals attending Club home or away matches as part of any image and/or audio-visual recording created by the Club of spectators attending any such match, including but not limited to security purposes. We may use any such images and recordings for our commercial activities where such use is in our legitimate interests (so long as our interests are not overridden by the impact on you). Such activities may include Club promotional activities and displaying such images on the Official Blackpool Football Club website in relation to any article, competition or promotion operated by the Club. This also applies to the Club's social media channels. To read the privacy policies of such social media channels, please consult the social media platform's website (e.g. Facebook and Twitter) directly.

## **3. News Updates and Marketing Information**

3.1 Where you have given us your consent, we may use your identity data and contact data to provide you with Club news updates and to inform you of special offers, promotions, new products and new services via post, telephone or email. We may also use your information to send you news and other updates by such means in relation to our official sponsors and partners and EFL sponsors and partners, if you give us your consent.

3.2 You may withdraw your consent to us using your information for the purposes mentioned in section 3.1 above at any time. This can be done by e-mailing us at [ticketoffice@blackpoolfc.co.uk](mailto:ticketoffice@blackpoolfc.co.uk), writing to us at Blackpool Football Club Limited, Bloomfield Road, Seaside Way, Blackpool, FY1 6JJ, clicking on the appropriate link at the bottom of any of our marketing e-mails or (if you are a registered user) amending your preferences on your personal profile page on the sites. Any such withdrawal will not affect the lawfulness of us sending such communications to you before you withdrew your consent.

3.3 Please note that if you withdraw (or do not provide) your consent to us sending you such information, this will mean that you will not be notified by us of any such news or marketing information (such as product discounts and ticket bundles).

## **4. Children and Young People**

4.1 It is our policy:

- (a) To encourage all minors to consult with their parents or legal guardian before submitting any content or information to us, our commercial partners or other third parties. Users of the sites, or certain services on them, who indicate

they are a minor may be asked to provide a valid email address for their parent or guardian so that we may verify parental consent, where required.

- (b) In relation to a Young Seaside's membership (the official junior supporters' club), the relevant membership and consent form must be filled out and signed by a parent or legal guardian. By doing so, the relevant permissions listed on the form are provided to fulfil the membership.

## **5. Security**

5.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know that information. However, the Internet is global and no data transmitted via the Internet can be guaranteed by us to be completely secure during transmission. We cannot guarantee the security of any information that you disclose online and we will not be responsible for any breach of security unless this is due to our negligence or wilful default.

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

5.3 If we have given you a password, or you have created a password, to access certain parts of our ticketing and shop sites, then you are solely responsible for keeping the password safe and making sure you use a secure browser.

## **6. Disclosure (sharing) of your information**

6.1 You will be asked before we disclose your personal information to third parties, unless:

- (a) they are only processing your information on our behalf in accordance with our instructions. The following activities in particular are carried out by third party processors on our behalf: ticketing; online merchandising; mailing services; hosting service providers.

- (b) they are directly involved in dealing with any request, enquiry, complaint or other correspondence submitted by you;

- (c) such disclosure is required by law;

- (d) the third party is providing us with professional advice where necessary for our legitimate interests and permitted by law;

- (e) the disclosure is in connection with criminal investigations, legal proceedings or prospective legal proceedings where necessary for our related legitimate interests and permitted by law;

- (f) the disclosure is necessary for our legitimate interests in establishing, exercising or defending our legal rights and permitted by law (including providing information to

others for the purposes of fraud prevention and enforcing our terms of use or ground regulations);

(g) the disclosure is in connection with a proposed sale of any part of our business or assets (in which case we may disclose your personal information to the prospective seller or buyer of such business or assets) or the proposed acquisition of substantially all of our assets by a third party. Any such disclosure will be made where necessary for the legitimate interests of us and/or the third party in respect of the proposed transaction; however, we will not transfer your personal information to any such third party unless we are satisfied that they are able to provide an adequate level of protection in respect of your personal information; or

(h) we have stated or informed you otherwise (e.g. in this Privacy Policy or on either Site).

6.2 Please note that if you purchase or obtain any away match tickets via our ticketing sites (for any competition, including at any neutral venue such as Wembley Stadium):

(a) we may disclose your name, postal address and date of birth to the relevant away team or away venue. This is because we will be acting on behalf of the relevant away team or away venue in supplying the relevant away tickets; and

(b) in such circumstances the relevant away team or away venue will also become a controller of that personal information and will assume corresponding responsibilities under applicable data protection legislation. Such information will become subject to the relevant away team or away venue's privacy policy (which you should read). We are not liable for the privacy policies or practices of away teams or away venues in respect of your personal information.

6.3 Except as provided in this Privacy Policy, we will not provide or disclose your information to third parties without your express consent for any purpose (including but not limited to direct marketing). We do not sell personal information under any circumstances.

## **7. Official Club Website – [www.blackpoolfc.co.uk](http://www.blackpoolfc.co.uk)**

7.1 The official Club website is operated on behalf of the Club by EFL Digital Limited (Company Number 04112553), whose registered and trading address is at EFL House, 10-12 West Cliff, Preston, Lancashire, England PR1 8HU. In using the website, you agree to the terms of use ([www.blackpoolfc.co.uk/terms-of-use/](http://www.blackpoolfc.co.uk/terms-of-use/)), including privacy policy ([www.blackpoolfc.co.uk/privacy-policy/](http://www.blackpoolfc.co.uk/privacy-policy/)). Both can be accessed by clicking on the relevant link.

## **8. Your rights**

8.1 You have a legal right to see a copy of the personal information that we keep about you and to require us to correct any inaccuracies, subject to certain exemptions. In some circumstances you may also have the right to:

(a) request that we erase any personal information held about you;

(b) restrict our processing of your personal information (for example, to ask to suspend the processing of personal information to establish its accuracy or the reasons for processing it);

8.2 In accordance with applicable data protection legislation, we follow security procedures in the storage and disclosure of your information. We may therefore request proof of your identity and rights before complying with any request of a nature described in section 8.1 above.

8.3 You will not generally have to pay a fee to exercise any of your rights described in section 8.3 above. However, we may charge a reasonable fee if you make a request to see a copy of your personal information which is clearly unfounded or excessive. Alternatively, we may refuse to comply with your request in such circumstances.

## **9. Retention and destruction of your personal information**

9.1 Any personal information held by us in relation to any of the purposes described in this Privacy Policy will be retained by us for as long as we need it to fulfil the purpose(s) for which it was collected.

9.2 For example, if you have consented to receiving news and marketing communications from us, your preferences in that regard will be retained by us unless and until:

- (a) we cease producing such communications; or
- (b) you withdraw your consent,

following which we will destroy or suppress such personal data without delay so that you no longer receive such communications from us

9.3 Save for any contact preferences suppressed under section 9.2 above, your information will be securely destroyed at the end of the relevant retention period described or otherwise referred to in this section 8.

9.4 Whilst taking into consideration our legal obligations, we will on an ongoing basis: review the length of time that we retain personal data for; consider the purpose or purposes for which we hold the personal data in deciding whether (and for how long) to retain it for; securely delete personal data that is no longer needed for such purpose or purposes; and update, archive or securely delete information if it goes out of date.

## **10. How will you know if we make any changes to this Privacy Policy?**

We may amend this Privacy Policy from time to time. Any changes we make to this Privacy Policy will become effective from the date of the change. If we make any substantial changes to the way in which we use your personal information collected via either our ticketing or shop site, or in any of the other circumstances covered by this Privacy Policy, we will notify you (e.g. by sending you an email). You can view the current version of our Privacy Policy by revisiting this page at any time. Alternatively, you can obtain a copy from the ticket office, or in our customer charter.

## **Your IP Address**

We use your IP address to help diagnose problems with our server and to administer the Sites. Your IP address is also used to help identify you and to gather broad demographic information about you. Your IP address may also be used to assist in the detection of fraud and we may pass this information to the police.

## **Cookies**

A cookie is a small file that is automatically issued to your computer when you enter our Sites and which is stored by the browser on your computer's hard drive. Cookies identify your computer, not the individual user of your computer. Cookies store some basic information that helps us to identify if a user of your computer has visited the Sites before and if you have provided us with some personalised information. Our Sites use cookies to keep track of what you have purchased. We use cookies to deliver content specific to your interests, to save your password (if you have supplied us with one) so you do not have to re-enter it each time you visit our Sites, and for other purposes, such as informing you that you may have made multiple bookings for specific events on our Sites. You can disable cookies or set your browser to alert you when cookies are being sent, but if you choose to do so you may not be able to access some areas of the Sites.