

Newcastle United Foundation Participant Privacy Notice

Introduction

Welcome to Newcastle United Foundation's privacy policy for participants.

Newcastle United Foundation respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you participate in one of our programmes and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this policy

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

It is important that you read this privacy policy together with any other privacy policy 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 policy supplements other notices and privacy policies and is not intended to override them.

Controller

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

Contact details

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

Email address: foundation@nufc.co.uk

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

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.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 1.9.2021.

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. 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 paragraph 4 (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).

3. 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.
- Third parties or publicly available sources. We will receive personal data about you from various third parties [and public sources].

4. How we use your personal data

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

Purposes for which we will use your personal data

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. 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 legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity – Schools (Secondary)	Type of data	Lawful basis for processing including basis of legitimate interest (article 6) and any condition for processing special category data (article 9)
To deliver programmes	Personal data: name, address, date of birth, gender. Special category data: ethnicity	Article 6 (1) (a) Consent - photographs / case studies (if applicable) Article 6 (1) (b) Performance of a contract. Article 6 (1) (f) Legitimate Interests Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest
Purpose/Activity – Schools (Primary)	Type of data	Lawful basis for processing including basis of legitimate interest (article 6) and any condition for processing special category data (article 9)
To be able to deliver the primary stars and PHSE programmes	Personal data: tend not to get names. Collect gender, ethnicity, class size, disability information, which class and school.	Article 6 (1) (a) Consent - photographs / case studies (if applicable) Article 6 (1) (f) Legitimate Interests

		Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest
Programme delivery - Family Learning	Personal data: name, address, telephone number, email address, gender, date of birth, emergency contact details, qualifications, employment status, Special category data: ethnicity, health / disability information	Article 6 (1) (a) Consent - photographs / case studies (if applicable) Article 6 (1) (b) Performance of a contract. Article 6 (1) (f) Legitimate Interests Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest
Purpose/Activity (Health & Wellbeing)	Type of data	Lawful basis for processing including basis of legitimate interest (article 6) and any condition for processing special category data (article 9)
To deliver the Andy's Man Club programme	Personal data: name, email address, telephone number. Optional: consent for pre and post surveys	Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant. Article 6 (1) (f) Legitimate Interests Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals). Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest
To deliver the Walking Football programme	Personal data: name, email address, residential address, age, date of birth, telephone number, gender, emergency contact details (name and number). Special category data: medical information	Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant. Article 6 (1) (f) Legitimate Interests Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals). Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest
Programme delivery - Mental Health First Aid	Personal data: name, email address, phone number, address Special category data: accessibility information	Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant. Article 6 (1) (f) Legitimate Interests Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals).

		Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest
NHS health checks	Personal data: Name, address, date of birth, GP surgery Special category data: weight, height, BMI, details on smoking / alcohol consumption, cholesterol levels and blood pressure.	Article 6 (1) (a) Consent Article 9 (2) (a) Consent
Purpose/Activity (Football)	Type of data	Lawful basis for processing including basis of legitimate interest (article 6) and any condition for processing special category data (article 9)
To enrol participants on a match day experience	Child name Contact name Contact number Allergies Any other information	Article 6 (1) (b) Performance of a contract. Article 6 (1) (a) Consent for any special category data. Article 9 (2) (a) Consent
To deliver College Football programmes	Personal data: name, address, email address, date of birth, gender, emergency contact details, national insurance number, photo consent, employment status, benefit details, qualifications, education history, financial information (fee assessment). Special category data: medical information, ethnicity	Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant. Article 6 (1) (f) Legitimate Interests Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals). Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest
Programme delivery - disabled groups	Schools programmes: first name and year group only. Other programmes: Personal data: name, date of birth, door number and postcode, contact details (note can be for parent / guardian if appropriate), email address, marketing consent and photo consent. Special category data: information on disabilities, gender and ethnicity (all of which have a ""prefer not to say"" option). Also possible to find out ACES information (adverse childhood experiences) and if there is a risk of exclusion from school / society.	Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant. Article 6 (1) (f) Legitimate Interests Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals). Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest

	If providing food, will also ask for any allergies as part of dietary requirements.	
To run Newcastle United Women's Team	Use the FA form for registration (as required).	Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant. Article 6 (1) (f) Legitimate Interests Article 6 (1) (a) Consent (where applicable for matters such as marketing / photography). Article 9 (2) (a) Consent (where applicable) Article 9 (2) (b) Necessary for employment law.
Programme delivery - women's and girls	Personal data: full name, date of birth (if a school session, the name of the school), postcode, address and emergency contact). Special category data: ethnicity. For those sessions not run at schools, information on medical conditions etc. that would be necessary for the safe delivery of the relevant programme.	Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant. Article 6 (1) (f) Legitimate Interests Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals). Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest
Programme delivery - advanced / performance centres, holiday camps and weekly centres	Name, Date of birth, Emergency contact number, Email address, Medical conditions, Photo consent	Article 6 (1) (b) Performance of a Contract. Article 6 (1) (a) Consent (if applicable for example for photography). Article 9(2) (a) Consent
Purpose/Activity (Community)	Type of data	Lawful basis for processing including basis of legitimate interest
Programme delivery – KICKS	Personal data: name, date of birth, door number and postcode, contact details (note can be for parent / guardian if appropriate), email address, marketing consent and photo consent. Special category data: information on disabilities, gender and ethnicity (all of which have a "prefer not to say" option). Also possible to find out ACES information (adverse childhood experiences) and if there is a risk of exclusion from school / society. If providing food, will also ask for	Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant. Article 6 (1) (f) Legitimate Interests Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals). Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest

	any allergies as part of dietary requirements.	
Programme delivery - Kicks targeted	<p>Personal data: name, date of birth, door number and postcode, contact details (note can be for parent / guardian if appropriate), email address, marketing consent and photo consent.</p> <p>Special category data: information on disabilities, gender and ethnicity (all of which have a "prefer not to say" option). Also possible to find out ACES information (adverse childhood experiences) and if there is a risk of exclusion from school / society.</p> <p>If providing food, will also ask for any allergies as part of dietary requirements.</p>	<p>Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant.</p> <p>Article 6 (1) (f) Legitimate Interests</p> <p>Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals).</p> <p>Article 9 (2) (a) Consent (where applicable)</p> <p>Article 9 (2) (d) Legitimate activities of a foundation</p> <p>Article 9 (2) (g) Substantial public interest</p>
Programme delivery – YOLO	<p>Personal data: Name, date of birth, residential address, next of kin. Social worker's contact details and applicable external agency details.</p> <p>Special category: ACES information</p> <p>Criminal Convictions data: when referrals are from the police, they do checks on the individual participant as well as family information and this information can be shared.</p>	<p>Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant.</p> <p>Article 6 (1) (f) Legitimate Interests</p> <p>Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals).</p> <p>Article 9 (2) (a) Consent (where applicable)</p> <p>Article 9 (2) (d) Legitimate activities of a foundation</p> <p>Article 9 (2) (g) Substantial public interest</p>
Programme delivery - National Citizen Services	<p>Personal data: name, date of birth, door number and postcode, contact details (note can be for parent / guardian if appropriate), email address, marketing consent and photo consent.</p> <p>Special category data: information on disabilities, gender and ethnicity (all of which have a "prefer not to say" option). Also possible to find out ACES information (adverse childhood experiences) and if there is a risk of exclusion from school / society.</p> <p>If providing food, will also ask for any allergies as part of dietary requirements.</p>	<p>Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant.</p> <p>Article 6 (1) (f) Legitimate Interests</p> <p>Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals).</p> <p>Article 9 (2) (a) Consent (where applicable)</p> <p>Article 9 (2) (d) Legitimate activities of a foundation</p> <p>Article 9 (2) (g) Substantial public interest</p>
Programme delivery - Great North Children's	<p>Personal data: name, date of birth, address, contact details for</p>	<p>Article 6 (1) (b) Performance of a contract - to deliver the programme to the</p>

Hospital Project	parents / guardians. Special category data: medical information (only with consent and / or where necessary if experiences are off-site)	participant. Article 6 (1) (f) Legitimate Interests Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals). Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest
Programme delivery - The Princes' Trust, Newcastle College Programmes	Personal data: name, date of birth, door number and postcode, contact details (note can be for parent / guardian if appropriate), email address, marketing consent and photo consent. Special category data: information on disabilities, gender and ethnicity (all of which have a "prefer not to say" option). Also possible to find out ACES information (adverse childhood experiences) and if there is a risk of exclusion from school / society. If providing food, will also ask for any allergies as part of dietary requirements.	Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant. Article 6 (1) (f) Legitimate Interests Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals). Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest
Purpose/Activity (NU Futures)	Type of data	Lawful basis for processing including basis of legitimate interest (article 6) and any condition for processing special category data (article 9)
Programme delivery - NU futures	Personal data: name, date of birth. Special category data: risk factors associated with the child (if applicable) - SENs etc. Some larger events for NU Futures may not have personal details of the participants.	Article 6 (1) (b) Performance of a contract - to deliver the programme to the participant. Article 6 (1) (f) Legitimate Interests Article 6 (1) (a) Consent (where applicable for matters such as marketing / using case studies of individuals). Article 9 (2) (a) Consent (where applicable) Article 9 (2) (d) Legitimate activities of a foundation Article 9 (2) (g) Substantial public interest
Purpose/Activity (Ball Kids)	Type of data	Lawful basis for processing including basis of legitimate interest (article 6) and any condition for processing special category data (article 9)
Football team - ball boys and girls on match days	Name, address, date of birth, age, gender, mobile number, emergency contact details,	Article 6 (1) (f) Legitimate Interests Article 6 (1) (a) Consent

	image and marketing consents. Special category data: medical information	Article 9 (2) (a) Consent
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Withdrawing consent

You can ask us to stop sending you marketing messages at any time by emailing foundation@nufc.co.uk

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.

5. Who might we share your data with

We may share your personal data with the parties for the purposes set out in the table at paragraph 4 (How we use your personal data) above.

We may also 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 policy.

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.

6. 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.

7. 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 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.

8. Data retention

How long will you use my personal data for?

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.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us using our contact details set out at the start of this policy.

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 could 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 person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us 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.