



# Match Day Hospitality Photography and Filming Privacy Notice

(including purchasers of Match Day Hospitality Package and Guests attending the Match Day Hospitality Package)

Issue Date: 20 June 2023

West Bromwich Albion Football Club Limited (the **Club**) respects the privacy of all individuals. We will collect and use personal data responsibly and in ways that are consistent with our obligations and your rights under the law. We understand the need to be extra careful when holding and using children's data.

This Privacy Notice only relates to how the Club will process the data collected at or during the Event.

This Privacy Notice explains how the Club will use and protect your personal data, as well as your rights in respect of it, how to exercise your rights and how to contact us (or how your parent / legal guardian / carer can do so on your behalf). This Privacy Notice supplements any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you (e.g. if you are using a Club website).

This Privacy Notice is not intended to override any other Club privacy notice or fair processing notice.

More information about how the Club processes personal data in general can be found in our Privacy Policy at [www.wba.co.uk/privacy-policy](http://www.wba.co.uk/privacy-policy)

## Information about other people

If you provide information to us about any other people, you must give them a copy of this Privacy Notice so that they understand how their information will be used. You should only provide information about them if you are authorised to do so.

REFERENCES TO 'FAMILY MEMBERS' INCLUDE LEGAL GUARDIAN(S) AND CARER(S) WHERE RELEVANT

## Changes to this Privacy Notice

Privacy laws and practice are constantly developing and we aim to meet high standards. Our policies and procedures are, therefore, under continual review. We may, from time to time, update our Privacy Notice. If we want to make any significant changes to the way in which we will use your personal data we will contact you and, if required, seek your consent (if you are under 16 any required consent will be requested from your parent / legal guardian / carer).

## About us

Unless we say otherwise, the Club is the data controller in respect of all personal data we obtain about you. This means that we are responsible for ensuring that we do so in full compliance with data protection and all other related privacy laws.

You can contact us as follows:

Address: West Bromwich Albion Football Club, The Hawthorns, West Bromwich, West Midlands B71 4LF

Phone: 0121 524 3470

Email address: [dataprotection@wbafc.co.uk](mailto:dataprotection@wbafc.co.uk)

If you have any questions or concerns about how we are handling your personal data these can be sent to the Club's HR Department at [dataprotection@wbafc.co.uk](mailto:dataprotection@wbafc.co.uk) or you can make a complaint to the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

If you are under 16, you can ask your parent / legal guardian / carer for help with these.

## Security

We take the security of personal data seriously. We use security technology, including firewalls, password protection and encryption to safeguard information and have procedures in place to ensure that our paper and computer systems and databases are protected against unauthorised disclosure, use, loss and damage. We have processes in place to deal with a data breach in the unlikely event one should occur.

We only use third party service providers where we are satisfied that they provide adequate security for your personal data.

## The types of personal data we hold and use

We will process the following types of personal data for our purposes and the Club is the controller of this data:

Title and name

Contact details such as address, email address and phone number

Age / date of birth

Event attended

Photographs, video, audio and other images and where and how we have used them

Race or ethnicity (where this is evident in the photograph, video, audio or other images)

Details of consents given

Names and contact details of parent / legal guardian / carer and other family members (*if applicable*)

## Where we get the personal data from

You

Your parent / legal guardian / carer

Hospitality purchaser

Guests attending the Event

Persons taking filming the photographs, video, audio and other images

## Decisions we make using personal data without involving a human in that process

We do not normally take any solely automated decisions.

## What we use the personal data for

We process personal data for a number of reasons, which are:

For individuals taking part in the Event

Reason for using the personal data	Legal basis
To use your image and likeness in any photos, video, audio in Club branding, marketing, induction materials, training materials, promotional materials, across all media including without limitation Club websites, social media channels, promotional videos, internal resources and advertising and/or to provide your image and likeness in any photos, video, audio to Hospitality match day purchasers/sponsors for their promotional purposes.	Personal data
	Consent
Managing our relationship with you, including:	Legitimate interest
	and, in addition for 'special category' personal data
	Explicit consent or
	It is necessary for the establishment, exercise or defence of legal claims

<ul style="list-style-type: none"> <li>• Notifying you of changes to our privacy notice</li> <li>• Notifying you of changes to our privacy notice</li> <li>• Keeping a record of your consent.</li> <li>• Ensuring that we can communicate with you.</li> </ul>	Personal data
	It is necessary for compliance with a legal obligation; and/or
	It is necessary for our legitimate interests which are to maintain a record of your contact details in case we need to contact you regarding the photographs, video, audio and other images, the consent provided in respect of the photographs, video, audio and other images and/or the terms of the consent form provided in respect of the photographs, video, audio and other images, to keep our records up to date and to communicate with you in respect of the photographs, video, audio and other images and to manage the Club's business effectively

**For family members of relevant guest attending the Event**

<b>Reason for using the personal data</b>	<b>Legal basis</b>			
To use your child's image and likeness in any photos, video, audio in Club branding, marketing, induction materials, training materials, promotional materials, across all media including without limitation Club websites, social media channels, promotional videos, internal resources and advertising and/or to provide their image and likeness in any photos, video, audio to Hospitality match day purchasers/sponsors for their promotional purposes.	<table border="1"> <tr><td>Personal data</td></tr> <tr><td>Consent</td></tr> <tr><td>Legitimate interest</td></tr> </table>	Personal data	Consent	Legitimate interest
Personal data				
Consent				
Legitimate interest				
Managing our relationship with you, including: <ul style="list-style-type: none"> <li>• Notifying you of changes to our privacy notice</li> <li>• Notifying you of changes to our privacy notice</li> <li>• Keeping a record of your consent.</li> <li>• Ensuring that we can communicate with you.</li> </ul>	<table border="1"> <tr><td>Personal data</td></tr> <tr><td>It is necessary for compliance with a legal obligation; and/or</td></tr> <tr><td>It is necessary for our legitimate interests which are to maintain a record of your contact details in case we need to contact you regarding the photographs, video, audio and other images, the consent provided in respect of the photographs, video, audio and other images and/or the terms of the consent form provided in respect of the photographs, video, audio and other images, to keep our records up to date and to communicate with you in respect of the photographs, video, audio and other images and to manage the Club's business effectively</td></tr> </table>	Personal data	It is necessary for compliance with a legal obligation; and/or	It is necessary for our legitimate interests which are to maintain a record of your contact details in case we need to contact you regarding the photographs, video, audio and other images, the consent provided in respect of the photographs, video, audio and other images and/or the terms of the consent form provided in respect of the photographs, video, audio and other images, to keep our records up to date and to communicate with you in respect of the photographs, video, audio and other images and to manage the Club's business effectively
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Where you have given your consent to any processing of personal data, you have the right to withdraw that consent at any time. If you do, it will not affect the lawfulness of any processing for which we had consent before it was withdrawn.

If you are under 16 and we need consent to process your personal data, we will normally ask your parent / legal guardian / carer for that consent. Your parent / legal guardian / carer can withdraw the consent at any time. If they do, it will not affect the lawfulness of any processing for which we had consent before it was withdrawn.

**Who we may disclose your personal data to**

- You
- Family members
- Guests of those attending with you at the Event
- The world at large via all media including without limitation Club websites, social media, brochures, press / media releases, newsletters, induction materials, training materials and publicity materials, advertising
- The media / press / broadcasters
- Club hospitality match purchasers/sponsors

Relevant service providers that provide services for the Club

## Where we keep your personal data

Photographs, video, audio and other images may be used in a range of ways such as on our websites, in social media and advertising which may involve them being anywhere in the world and you will have given your explicit consent to this. General details such as contact information and will normally remain within the United Kingdom or the European Economic Area .

However, wherever we transfer your personal data outside of the United Kingdom, we will take proper care to ensure that it is protected in accordance with this Privacy Notice and applicable privacy laws.

Where we use service providers that provide their services in countries that are not deemed to have an adequate level of protection for personal data, we will normally use the United Kingdom approved 'Standard Contractual Clauses' as the legally accepted mechanism to allow the transfer and protect your data protection rights.

## How long we keep your personal data for

The duration for which we keep personal data depends on your relationship with us.

We will only retain your personal data detailed in this Privacy Notice for as long as necessary to fulfil the purposes it was collected for, including for the purposes of satisfying any legal, accounting or reporting requirements. Personal data obtained under this Privacy Notice will be kept indefinitely.

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 unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve these purposes through other means, and the applicable legal requirements.

For further information, please contact us using the details on the first page of this Privacy Notice.

## Your legal rights in respect of your personal data

**(If you are a minor, your parent / legal guardian / carer can use these on your behalf if you would like them to)**

You have a number of legal rights over your personal data which are:

Right	Explanation
<b>Access</b>	You have the right to receive a copy of the personal data that we hold about you. We will need proof of identity and proof of authority if the request comes from someone other than you. This will ensure we only provide information to the correct person.
<b>withdraw consent to direct marketing</b>	You can exercise this right at any time. Just send an email to <a href="mailto:dataprotection@wbafc.co.uk">dataprotection@wbafc.co.uk</a> and we will take care of this for you.
<b>withdraw consent to other processing.</b>	Where the only legal basis for our processing your personal data is that we have your consent, you can withdraw that consent at any time, and we will have to stop processing your personal data. Please note, this does not mean that processing carried out before you withdrew your consent is unlawful.
<b>rectification</b>	If you think any of the personal data we hold about you is inaccurate – please contact us at <a href="mailto:dataprotection@wbafc.co.uk">dataprotection@wbafc.co.uk</a> and we will check and, if necessary, amend our records.
<b>Restriction</b>	In limited circumstances you may be able to require us to restrict our processing of your personal data. For example, if you think what we hold is inaccurate and we disagree, we may restrict what we do with your personal data until the accuracy has been verified.
<b>Erasure</b>	In some circumstances, for example, where we have no legal basis for keeping your personal data, you may be entitled to require us to delete it.

<b>Objection</b>	Where our processing is based on it being in our legitimate interests, you may be entitled to object to us processing it.
<b>Portability</b>	Where you have provided personal data to us electronically, you may be entitled to require us to provide that data to you electronically or to transmit it to someone else.
<b>Complain</b>	If you have any concerns or complaints about how we are handling your personal data we would prefer you to get in touch with us directly so that we can try to resolve the issue. You can also contact the Information Commissioner's Office at <a href="http://www.ico.org.uk">www.ico.org.uk</a> .

Some of these legal rights are subject to exceptions which means that we may be entitled, or required, to refuse to comply with a request