



Privacy Notice

SCOUTING

last updated 6 July 2023

Privacy Notice

West Bromwich Albion Football Club Limited (the **Club**) is keen to identify new playing and coaching talent and works with a number of talent scouts and scouting information service providers to support the initiative.

The Club may not always receive contact details for each person at the time we receive information about them or it may involve a disproportionate effort to try to find contact details for every person. In these cases, a Privacy Notice being provided directly to each individual, may not be feasible, but the detail in this Privacy Notice can be accessed from our website Privacy Policy.

This Privacy Notice explains how the Club uses and protects your personal data, as well as your rights in respect of it, how to exercise your rights and how to contact us. More information about how the Club processes personal data in general can be found in our Privacy Policy at www.wbafc.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.

About us

The Club is the data controller in respect of all personal data we obtain about you.

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

Categories of personal data that we process

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

Name, age and contact details

Information about your skills and experience in football and other sports including:

- scouting reports
- appearances, goals, assists, passing, offensive and defensive duels, finishing, goals, chance creation, ball progression, build up play, tackles, fouls, disciplinary record, position(s), clubs played for, left or right footed, height
- speed, high intensity actions, accelerations, distance covered, sprint distance

Injuries

Images

Social media use, entries, images and comments

Other media features and commentary

Nationality, previous clubs and governing body endorsement points achieved (where applicable)

Sources of personal data

We obtain information from:

- talent scouts and scouting data providers, the media, coaches and match officials
- third party data providers
- social media accounts
- the media
- you, agents, representatives and family members
- football governing bodies, football leagues and other clubs

Automated decisions using personal data

We do not normally take any solely automated decisions.

Purposes for which we process personal data and the legal basis for doing so

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

Purpose	Legal basis								
<p>Talent identification and advancement – to identify and advance talent in football and to deal with administration / communications in respect of such identification and advancement.</p>	<table border="1"> <tr> <td data-bbox="943 891 1399 934">Personal data</td> </tr> <tr> <td data-bbox="943 934 1399 1061">It is necessary to perform a contract to which you are subject or to take steps at your request prior to entering into a contract</td> </tr> <tr> <td data-bbox="943 1061 1399 1308">The processing is in our legitimate interests (for example to uphold standards and ensure the reputation of and opportunities in football are enhanced, to support progress of talented individuals in football and to preserve the reputation of the Club) or for establishing and dealing with any legal claims.</td> </tr> <tr> <td data-bbox="943 1346 1399 1420">and, in addition for 'special category' personal data</td> </tr> <tr> <td data-bbox="943 1420 1399 1462">Explicit consent or</td> </tr> <tr> <td data-bbox="943 1462 1399 1559">It is necessary for carrying out obligations and exercising rights of you or the Club in the field of employment</td> </tr> <tr> <td data-bbox="943 1559 1399 1632">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="943 1632 1399 1697">It is necessary for the establishment, exercise or defence of legal claims</td> </tr> </table>	Personal data	It is necessary to perform a contract to which you are subject or to take steps at your request prior to entering into a contract	The processing is in our legitimate interests (for example to uphold standards and ensure the reputation of and opportunities in football are enhanced, to support progress of talented individuals in football and to preserve the reputation of the Club) or for establishing and dealing with any legal claims.	and, in addition for 'special category' personal data	Explicit consent or	It is necessary for carrying out obligations and exercising rights of you or the Club in the field of employment	It relates to personal data that are manifestly made public by you and/or	It is necessary for the establishment, exercise or defence of legal claims
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Explicit consent or									
It is necessary for carrying out obligations and exercising rights of you or the Club in the field of employment									
It relates to personal data that are manifestly made public by you and/or									
It is necessary for the establishment, exercise or defence of legal claims									
<p>Safeguarding matters. Administration of support in safeguarding children and adults at risk including dealing with safeguarding concerns raised/suspected.</p>	<table border="1"> <tr> <td data-bbox="943 1736 1399 1778">Personal data</td> </tr> <tr> <td data-bbox="943 1778 1399 1852">It is necessary for compliance with a legal obligation; and/or</td> </tr> <tr> <td data-bbox="943 1852 1399 2011">It is necessary for our legitimate interests and those of others to ensure the safety of all persons that are involved with or come into contact with the Club and to preserve the reputation of the Club</td> </tr> </table>	Personal data	It is necessary for compliance with a legal obligation; and/or	It is necessary for our legitimate interests and those of others to ensure the safety of all persons that are involved with or come into contact with the Club and to preserve the reputation of the Club					
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	<p>and, in addition for 'special category' personal data</p> <p>Explicit consent or</p> <p>It is necessary to protect an individual from neglect or physical, mental or emotional harm or to protect the physical, mental or emotional well-being of an individual</p> <p>It relates to personal data that are manifestly made public by you and/or</p> <p>It is necessary for the establishment, exercise or defence of legal claims</p>
Dealing with any complaints / legal matters	<p>Personal data</p> <p>The processing is in our legitimate interests (for example to uphold standards and ensure the reputation of and opportunities in football are enhanced, to preserve the reputation of the Club) or for establishing and dealing with any legal claims.</p> <p>and, in addition for 'special category' personal data</p> <p>Explicit consent or</p> <p>It relates to personal data that are manifestly made public by you and/or</p> <p>It is necessary for the establishment, exercise or defence of legal claims</p>

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 prior to your withdrawing it.

Who we may disclose your personal data to

You
 Scouts
 Complainants
 Insurers
 Legal and other professional advisers
 Regulators
 Courts or tribunals
 Police and other law enforcement agencies
 Government agencies (*where we have a legal obligation to do so*)
 Relevant service providers that provide services to the Club
 Football governing bodies, authorities and football leagues
 Other clubs

Location of your personal data

In most cases, we normally keep your personal data within the United Kingdom

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. The normal expectation is detailed below.

General records

Normally for 6 years after you cease to be involved with the Club or 6 years after our last contact with you or 6 years after we have taken an interest in you as a prospective player (*whichever is longer*)

Safeguarding

Concerns about Children: until the individual reaches the age of 25 unless there is a legitimate basis to retain it for longer
Adult Records: until the individual reaches their normal retirement age or for 10 years (whichever is longer) unless there is a legitimate basis to retain it for longer
Malicious allegations: immediate deletion unless there is a legitimate basis to retain it for longer

After this time period we will securely delete your personal data or anonymise / pseudonymise it unless we have a legal basis for keeping it.

In the unlikely event that there is a complaint or incident which involves or affects you, we may keep your personal data for 6 years after the matter is resolved.

Your legal rights in respect of your personal data

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

Right	Explanation
access	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.
withdraw consent to direct marketing	You can exercise this right at any time. Just send an email to dataprotection@wbaafc.co.uk and we will take care of this for you.
withdraw consent to other processing.	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.
rectification	If you think any of the personal data we hold about you is inaccurate – please contact us at dataprotection@wbaafc.co.uk and we will check and, if necessary, amend our records.
restriction	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.
erasure	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.
objection	Where our processing is based on it being in our legitimate interests, you may be entitled to object to us processing it.
portability	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.
complain	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 You can also contact the Information Commissioner's Office at www.ico.org.uk .

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

Concerns and complaints

If you have any concerns or complaints about how we are handling your data please contact us at dataprotection@wbaafc.co.uk. You can also contact the Information Commissioner's Office (see www.ico.org.uk).