



Prize Draw Privacy Notice

Issue Date: August 2023 (v1)

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 in respect of a Prize Draw.

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

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.

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

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 or you can make a complaint to the Information Commissioner's Office (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 (including county that you live in), email address and phone number

Age / date of birth

Where we get the personal data from

You

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 Prize Draw

Reason for using the personal data	Legal basis					
<p>Managing our relationship with you, including:</p> <ul style="list-style-type: none"> • To verify the identity of the participants in the prize draw • To verify the eligibility of a participant to enter the prize draw • To identify the winner of the prize draw • To notify the winner of the prize draw and to provide the prize winner with the prize • Publicising your surname, county and/or winning entry 	<table border="1"> <tr> <td data-bbox="679 1507 1394 1547">Personal data</td> </tr> <tr> <td data-bbox="679 1554 1394 1648">It is necessary to fulfil the contract that you are going to enter into or have entered into with us in respect of the prize draw; and/or</td> </tr> <tr> <td data-bbox="679 1655 1394 1691">It is necessary for compliance with a legal obligation; and/or</td> </tr> <tr> <td data-bbox="679 1697 1394 1816">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 prize draw and to manage the Club's business effectively; and/or</td> </tr> <tr> <td data-bbox="679 1823 1394 1854">Consent</td> </tr> </table>	Personal data	It is necessary to fulfil the contract that you are going to enter into or have entered into with us in respect of the prize draw; and/or	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 prize draw and to manage the Club's business effectively; and/or	Consent
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Consent						

<ul style="list-style-type: none"> • Notifying you of changes to our privacy notice • Notifying you of changes to our privacy notice • Ensuring that we can communicate with you. 						
<p>Resolving complaints.</p> <p>Investigating any claims that the Club believes may be contrary to the prize draw terms and conditions and/or fraudulent in nature and taking further actions, such as legal proceedings where appropriate.</p> <p>Establishment, exercise and/or defence of legal claims</p>	<table border="1"> <tr> <td data-bbox="687 477 1378 517">Personal data</td> </tr> <tr> <td data-bbox="687 521 1378 589">It is necessary for the establishment, exercise and/or defence of legal claims</td> </tr> <tr> <td data-bbox="687 593 1378 683">It is necessary to fulfil the contract that you are going to enter into or have entered into with us in respect of the prize draw; and/or</td> </tr> <tr> <td data-bbox="687 687 1378 732">It is necessary for compliance with a legal obligation; and/or</td> </tr> <tr> <td data-bbox="687 736 1378 804">It is necessary for our legitimate interests which are to ensure we manage the Club's business effectively</td> </tr> </table>	Personal data	It is necessary for the establishment, exercise and/or defence of legal claims	It is necessary to fulfil the contract that you are going to enter into or have entered into with us in respect of the prize draw; and/or	It is necessary for compliance with a legal obligation; and/or	It is necessary for our legitimate interests which are to ensure we manage the Club's business effectively
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It is necessary for compliance with a legal obligation; and/or						
It is necessary for our legitimate interests which are to ensure we manage the Club's business effectively						

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

Individuals that request prize winner information in accordance with the requirements of the Advertising Standards Authority and/or relevant laws, rules and/or regulations.

Advertising Standards Authority

The world at large via all media including without limitation in person, Club websites, social media, brochures, press / media releases, newsletters, induction materials, training materials and publicity materials, advertising

The media / press / broadcasters

Relevant service providers that provide services for the Club

Where we keep your personal data

General personal data provided in relation to the prize draw 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 normally for 12 months after the prize draw or 12 months after our last contact with you in respect of the prize draw (*whichever is longer*).

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

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@wbafc.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@wbafc.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