



Staff (non-player) Privacy Notice

(including family members, agents, representatives and emergency contacts)

last updated 6 July 2023

West Bromwich Albion Football Club Limited (the **Club**) respects the privacy of all staff and everyone else associated with them. We will collect and use personal data responsibly and in ways that are consistent with our obligations and your rights under the law.

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.

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.

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, you can direct them to 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).

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.

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.

for applicants

<p>Personal details</p> <p>Title, name, any 'known as' name and personal pronoun</p> <p>Contact details such as address, email address and phone number</p> <p>Nationality / citizenship / place of birth</p> <p>Information about your right to work in the UK</p> <p>Equality and inclusion information</p> <p>Information about your criminal record <i>(if applicable)</i></p>	<p>History and skills</p> <p>Education</p> <p>Qualifications</p> <p>Experience</p> <p>Previous employers and contracts with the Club</p> <p>Other information provided on a CV</p>	<p>Diversity and inclusion</p> <p>Marital status</p> <p>Age / date of birth</p> <p>Religious beliefs</p> <p>Gender</p> <p>Ethnicity</p> <p>Sexual orientation</p> <p>Political opinions</p> <p>Disability / health conditions</p>
<p>Role</p> <p>Role(s) applied for</p> <p>Role(s) considered for <i>(if different)</i></p>	<p>Relevant contacts</p> <p>Name and contact details for references</p> <p>Name and contact details of agent</p> <p>Name and contact details of legal and other professional representatives</p>	<p>Criminal convictions and offences</p> <p>Type of Conviction</p> <p>Disposal</p>

for successful applicants

If you are successful and you want to accept an offer of work with us, we will obtain additional information. This may come from you, your previous employer(s) or social media or from the Club directly. Typically, this will include the following types of information.

<p>Personal details</p> <p>Proof of residence</p>	<p>References</p> <p>References obtained</p>	<p>Immigration details</p> <p>Home Office check results <i>(where relevant)</i></p> <p>Overseas police vetting check <i>(where relevant)</i></p> <p>Copies of right to work documents</p>
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If you accept an offer of work with us, we will obtain further information which will form part of your personnel records. This may come from you, your previous employer(s) or social media or from the Club directly. Typically, this will include the following types of information.

<p>Personal details</p> <p>National insurance number</p> <p>Pay and benefits (including any bonuses or supplements)</p> <p>Pension and health insurance information</p> <p>Contract of employment / engagement</p>	<p>Medical details</p> <p>Medical information (allergy / disability information and medical conditions)</p> <p>DBS</p> <p>DBS status and date of expiry <i>(for relevant roles)</i></p>	<p>Role details</p> <p>Start date / date of continuous employment</p> <p>Working location</p> <p>Department and role</p> <p>Security pass details</p> <p>Details of Club provided equipment, (eg laptop)</p> <p>Travel and accommodation details <i>(if applicable)</i></p>
<p>Relevant contacts</p> <p>Names and contact details of family members</p> <p>Name and contact details of GP</p> <p>Name and contact details of next of kin and emergency contacts</p>	<p>Financial details</p> <p>Bank account details</p> <p>Tax details</p> <p>Expenses to be paid or reimbursed by the Club</p>	<p>Driving details</p> <p>Motor Vehicle Insurance and MOT details (only where car allowance is provided as an employee benefit)</p> <p>Driving Licence (only where car allowance is provided as an employee benefit or where driving is required as part of your role)</p> <p>Driving Licence Check Code (only where driving is required as part of your role)</p>

for employees, contractors, students, volunteers, casual and temporary workers and work experience staff

During the course of your work, we will obtain further information. Typically, this will include the following types of information.

Conduct	Medical	Financial
<p>Time keeping records (including through use of swipe card or other entry systems)</p> <p>Details of use of Club assets and communication systems</p> <p>Appraisal records</p> <p>Training details</p> <p>Details of promotions applied for and / granted</p> <p>Grievances</p> <p>Details of any disciplinary or grievance procedures in which you have been involved</p> <p>Safeguarding records</p> <p>Anti-corruption records</p>	<p>Medical records and information (including mental health, injury records)</p> <p>Medical / mental health conditions (<i>past and present</i>) including disabilities, impairments, sickness, injuries, allergy and intolerances information, vaccination status, special requirements and medical needs</p> <p>Medical or occupational health reports</p> <p>Health and medical insurance details and claims</p> <p>Details of any accidents suffered</p>	<p>Payroll records</p> <p>Bonuses or supplements</p> <p>Expenses claimed / paid</p> <p>Pension records</p> <p>Other details</p> <p>Records of consents given and refused</p> <p>Details of periods of leave taken by you (including holiday, sickness absence, family leave, compassionate, maternity, parental, paternity, adoption leave) and the reasons for the leave</p> <p>Leaving date</p> <p>Flexible working requests</p> <p>Whistleblowing records (whistleblowing where the staff member is identifiable)</p>
referees / agents / representatives	for family members	for emergency contacts
<p>Title, name , any 'known as' name and personal pronoun</p> <p>Agency or organisation</p> <p>Safeguarding records</p> <p>Contact details</p>	<p>Title, name, any 'known as' name and personal pronoun</p> <p>Relationship to applicant / staff member</p> <p>Contact details</p> <p>Safeguarding records</p> <p>Medical / mental health conditions (<i>past and present</i>) (only where family member is to be included on private medical cover as part of an employee's benefit)</p>	<p>Title, name, any 'known as' name and personal pronoun</p> <p>Relationship to applicant / staff member</p> <p>Contact details</p>

Certain personal data is designated as 'special category data' in law, which means it has special protection. This includes: information about health, race or ethnicity, political opinions, religious and philosophical beliefs, genetic and biometric data and information concerning a person's sex life or sexual orientation. Criminal records and offences information is also given special protection in law.

Sources of personal data

for employees, contractors, students, volunteers, casual and temporary workers and work experience staff

<p>You HM Revenue & Customs <i>(if applicable)</i> Previous employers Other clubs you have provided services to Any agency used by the Club for recruitment Disciplinary panels Family members Agents and representatives Persons providing a reference for you</p>	<p>Medical and occupational health professionals <i>(if applicable)</i> Professional bodies for relevant members of staff Other members of staff The media / press / broadcasters <i>(if applicable)</i></p>	<p>Stakeholders in anti-corruption matters including other sports organisations, the Gambling Commission, betting operators and sports related integrity units Social media Insurers Police and other law enforcement agencies Legal and other professional advisers Regulators</p>
family members	agents / representatives	emergency contacts
<p>You The applicant / staff member The Club Social media Legal and other professional advisers Regulators</p>	<p>You The applicant / staff member The Club The media Social media Legal and other professional advisers Regulators</p>	<p>You The applicant / staff member Legal and other professional advisers Regulators</p>

We obtain some information through searches of various public resources such as electoral registers, identity checking services, Companies House, social media platforms like Twitter, Instagram and Facebook and also carry out browser-based searches.

We may use third party service providers to do this on our behalf.

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:

for employees, contractors, students, volunteers, casual and temporary workers and work experience staff

Purpose	Legal basis						
<p>Application administration. Administration of the application for a position and the recruitment process, including verifying your general eligibility for the role; carrying out the selection process.</p>	<table border="1"> <tr> <td data-bbox="689 479 1409 519">Personal data</td> </tr> <tr> <td data-bbox="689 519 1409 595">It is necessary to fulfil the contract that you are going to enter into or have entered into with us and/or</td> </tr> <tr> <td data-bbox="689 595 1409 636">It is necessary for compliance with a legal obligation and/or</td> </tr> <tr> <td data-bbox="689 636 1409 754">It is necessary for our legitimate interests which are to ensure staff meet the Club's policies and objectives and managing its business effectively and meet any requirements set by football governing bodies and</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 and/or	It is necessary for compliance with a legal obligation and/or	It is necessary for our legitimate interests which are to ensure staff meet the Club's policies and objectives and managing its business effectively and meet any requirements set by football governing bodies and		
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<p>Staff administration. Includes obtaining insurance, provision of equipment, making pension, benefits, training, travel and accommodation arrangements, providing and obtaining references and general business administration</p>	<table border="1"> <tr> <td data-bbox="689 804 1409 844">and, in addition for 'special category' personal data</td> </tr> <tr> <td data-bbox="689 844 1409 884">Explicit consent or</td> </tr> <tr> <td data-bbox="689 884 1409 983">It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or</td> </tr> <tr> <td data-bbox="689 983 1409 1059">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="689 1059 1409 1099">It is necessary for insurance purposes and/or</td> </tr> <tr> <td data-bbox="689 1099 1409 1167">It is necessary for the establishment, exercise or defence of legal claims</td> </tr> </table>	and, in addition for 'special category' personal data	Explicit consent or	It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or	It relates to personal data that are manifestly made public by you and/or	It is necessary for insurance purposes and/or	It is necessary for the establishment, exercise or defence of legal claims
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<p>Remuneration and benefits administration. Includes payment of remuneration, expenses and allowances and to enable the delivery of pension and insurance schemes</p>	<table border="1"> <tr> <td data-bbox="689 1207 1409 1247">and, in addition for 'special category' personal data</td> </tr> <tr> <td data-bbox="689 1247 1409 1288">Explicit consent or</td> </tr> <tr> <td data-bbox="689 1288 1409 1386">It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or</td> </tr> <tr> <td data-bbox="689 1386 1409 1462">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="689 1462 1409 1503">It is necessary for insurance purposes and/or</td> </tr> <tr> <td data-bbox="689 1503 1409 1579">It is necessary for the establishment, exercise or defence of legal claims</td> </tr> </table>	and, in addition for 'special category' personal data	Explicit consent or	It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or	It relates to personal data that are manifestly made public by you and/or	It is necessary for insurance purposes and/or	It is necessary for the establishment, exercise or defence of legal claims
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<p>Education and training purposes. Including performance and development</p>	<table border="1"> <tr> <td data-bbox="689 1207 1409 1247">and, in addition for 'special category' personal data</td> </tr> <tr> <td data-bbox="689 1247 1409 1288">Explicit consent or</td> </tr> <tr> <td data-bbox="689 1288 1409 1386">It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or</td> </tr> <tr> <td data-bbox="689 1386 1409 1462">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="689 1462 1409 1503">It is necessary for insurance purposes and/or</td> </tr> <tr> <td data-bbox="689 1503 1409 1579">It is necessary for the establishment, exercise or defence of legal claims</td> </tr> </table>	and, in addition for 'special category' personal data	Explicit consent or	It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or	It relates to personal data that are manifestly made public by you and/or	It is necessary for insurance purposes and/or	It is necessary for the establishment, exercise or defence of legal claims
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<p>Appraisals and reviews and dealing with any grievances</p>	<table border="1"> <tr> <td data-bbox="689 1207 1409 1247">and, in addition for 'special category' personal data</td> </tr> <tr> <td data-bbox="689 1247 1409 1288">Explicit consent or</td> </tr> <tr> <td data-bbox="689 1288 1409 1386">It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or</td> </tr> <tr> <td data-bbox="689 1386 1409 1462">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="689 1462 1409 1503">It is necessary for insurance purposes and/or</td> </tr> <tr> <td data-bbox="689 1503 1409 1579">It is necessary for the establishment, exercise or defence of legal claims</td> </tr> </table>	and, in addition for 'special category' personal data	Explicit consent or	It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or	It relates to personal data that are manifestly made public by you and/or	It is necessary for insurance purposes and/or	It is necessary for the establishment, exercise or defence of legal claims
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<p>Contract compliance. Ensuring compliance with your contract with the Club (<i>if applicable</i>) including rules set by the relevant football authorities</p>	<table border="1"> <tr> <td data-bbox="689 1207 1409 1247">and, in addition for 'special category' personal data</td> </tr> <tr> <td data-bbox="689 1247 1409 1288">Explicit consent or</td> </tr> <tr> <td data-bbox="689 1288 1409 1386">It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or</td> </tr> <tr> <td data-bbox="689 1386 1409 1462">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="689 1462 1409 1503">It is necessary for insurance purposes and/or</td> </tr> <tr> <td data-bbox="689 1503 1409 1579">It is necessary for the establishment, exercise or defence of legal claims</td> </tr> </table>	and, in addition for 'special category' personal data	Explicit consent or	It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or	It relates to personal data that are manifestly made public by you and/or	It is necessary for insurance purposes and/or	It is necessary for the establishment, exercise or defence of legal claims
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<p>Policy compliance. Ensuring compliance with the Club's policies</p>	<table border="1"> <tr> <td data-bbox="689 1207 1409 1247">and, in addition for 'special category' personal data</td> </tr> <tr> <td data-bbox="689 1247 1409 1288">Explicit consent or</td> </tr> <tr> <td data-bbox="689 1288 1409 1386">It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or</td> </tr> <tr> <td data-bbox="689 1386 1409 1462">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="689 1462 1409 1503">It is necessary for insurance purposes and/or</td> </tr> <tr> <td data-bbox="689 1503 1409 1579">It is necessary for the establishment, exercise or defence of legal claims</td> </tr> </table>	and, in addition for 'special category' personal data	Explicit consent or	It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or	It relates to personal data that are manifestly made public by you and/or	It is necessary for insurance purposes and/or	It is necessary for the establishment, exercise or defence of legal claims
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<p>Commercial activities. Administration and carrying out Club commercial activities including those that have been specifically agreed with you / your family member(s) / agents / representatives / the PFA (<i>as applicable</i>)</p>	<table border="1"> <tr> <td data-bbox="689 1207 1409 1247">and, in addition for 'special category' personal data</td> </tr> <tr> <td data-bbox="689 1247 1409 1288">Explicit consent or</td> </tr> <tr> <td data-bbox="689 1288 1409 1386">It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or</td> </tr> <tr> <td data-bbox="689 1386 1409 1462">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="689 1462 1409 1503">It is necessary for insurance purposes and/or</td> </tr> <tr> <td data-bbox="689 1503 1409 1579">It is necessary for the establishment, exercise or defence of legal claims</td> </tr> </table>	and, in addition for 'special category' personal data	Explicit consent or	It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or	It relates to personal data that are manifestly made public by you and/or	It is necessary for insurance purposes and/or	It is necessary for the establishment, exercise or defence of legal claims
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<p>Staff health and welfare. Dealing with any medical issues, injuries, allergies, special needs and mental health concerns, providing physical and emotional support</p>	<table border="1"> <tr> <td data-bbox="689 1688 1409 1729">Personal data</td> </tr> <tr> <td data-bbox="689 1729 1409 1805">It is necessary to fulfil the contract that you are going to enter into or have entered into with us and/or</td> </tr> <tr> <td data-bbox="689 1805 1409 1904">It is necessary for our legitimate interests which are to ensure are able to effectively perform their duties and meet insurance requirements</td> </tr> <tr> <td data-bbox="689 1944 1409 1984">and, in addition for 'special category' personal data</td> </tr> <tr> <td data-bbox="689 1984 1409 2024">Explicit consent or</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 and/or	It is necessary for our legitimate interests which are to ensure are able to effectively perform their duties and meet insurance requirements	and, in addition for 'special category' personal data	Explicit consent or	
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	<p>It relates to personal data that are manifestly made public by you and/or</p> <p>It is in your vital interests or the vital interests of another person and/or</p> <p>It is necessary for the purposes of preventative or occupational medicine or assessment of your working capacity, medical diagnosis or the provision of health or social care or treatment and/or</p> <p>It is necessary for the establishment, exercise or defence of legal claims</p>
Anti-corruption and fraud. Monitoring, compliance and enforcement	<p>for personal data and 'special category' personal data</p> <p>It is in our legitimate interests and those of other sports to preserve standards in sport and</p> <p>It relates to personal data that are manifestly made public by you and/or</p> <p>It is necessary for the prevention or detection of an unlawful act and/or</p> <p>It is necessary for the prevention of fraud and/or</p> <p>It is necessary for the establishment, exercise or defence of legal claims</p>
Immigration status monitoring and compliance. Includes administering Home Office audits (<i>if applicable</i>)	<p>personal data</p> <p>It is necessary for compliance with a legal obligation and/or</p> <p>It is necessary for our legitimate interests which are to ensure staff meet the Club's objectives and requirements set by football governing bodies</p> <p>and, in addition for 'special category' personal data</p> <p>Explicit consent or</p> <p>It is necessary for the purposes of equality of opportunity and/or</p> <p>Is necessary for the establishment, exercise or defence of legal claims</p>
Diversity and inclusion monitoring. Diversity monitoring and compliance (such as in respect of ethnicity, gender, race, age and disability) and providing equal opportunities	
Quality and improvement monitoring	
Disciplinary purposes. Administration for disciplinary purposes and regulatory enforcement	<p>personal data</p> <p>It is necessary for our legitimate interests and those of others which are to ensure effective administration of staff and to ensure they meet the Club's objectives and the requirements set by football governing bodies and it is in our legitimate interests to maintain records.</p>
Record keeping. Maintaining Club records including historical records of resources, conduct, training and compliance	<p>and, in addition for 'special category' personal data</p> <p>Explicit consent or</p> <p>It is necessary for scientific or historical research or statistical purposes and/or</p> <p>It is necessary to protect the integrity of sport and/or</p> <p>Is necessary for the establishment, exercise or defence of legal claims</p>
Reputation. Club reputation management	
Publicity. Publicity and media activity	

<p>Security. Including the issue and use of security passes and personal protection personnel.</p>	<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 and those of others which are to ensure effective safety of players, staff, fans and others at our offices, training grounds and match and other venues</td> </tr> <tr> <td>and, in addition for 'special category' personal data</td> </tr> <tr> <td>Explicit consent or</td> </tr> <tr> <td>It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td>It is necessary for insurance purposes and/or</td> </tr> <tr> <td>It is necessary for the establishment, exercise or defence of legal claims</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 which are to ensure effective safety of players, staff, fans and others at our offices, training grounds and match and other venues	and, in addition for 'special category' personal data	Explicit consent or	It relates to personal data that are manifestly made public by you and/or	It is necessary for insurance purposes and/or	It is necessary for the establishment, exercise or defence of legal claims
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<p>Safeguarding matters. Including dealing with safeguarding concerns raised/suspected.</p>	<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 and those of others to ensure the safety of all persons that are involved with or come into contact with the Club</td> </tr> <tr> <td>and, in addition for 'special category' personal data</td> </tr> <tr> <td>Explicit consent or</td> </tr> <tr> <td>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</td> </tr> <tr> <td>It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td>It is necessary for the establishment, exercise or defence of legal claims</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, in addition for 'special category' personal data	Explicit consent or	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	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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for family members, agents, representatives and emergency contacts

<p>Internal administration. Includes obtaining insurance, making travel and accommodation arrangements</p>	<table border="1"> <tr><td>Personal data</td></tr> <tr><td>Consent or</td></tr> <tr><td>It is necessary to fulfil the contract that you are going to enter into or have entered into with us and/or</td></tr> <tr><td>It is necessary for our legitimate interests and those of the applicant / staff member or their family members and you to ensure appropriate arrangements are made</td></tr> <tr><td>and, in addition for 'special category' personal data</td></tr> <tr><td>Explicit consent or</td></tr> <tr><td>It relates to personal data that are manifestly made public by you and/or</td></tr> <tr><td>Is necessary for the establishment, exercise or defence of legal claims</td></tr> </table>	Personal data	Consent or	It is necessary to fulfil the contract that you are going to enter into or have entered into with us and/or	It is necessary for our legitimate interests and those of the applicant / staff member or their family members and you to ensure appropriate arrangements are made	and, in addition for 'special category' personal data	Explicit consent or	It relates to personal data that are manifestly made public by you and/or	Is necessary for the establishment, exercise or defence of legal claims
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<p>Security. Including the issue and use of security passes and personal protection personnel.</p>	<table border="1"> <tr><td>personal data</td></tr> <tr><td>It is necessary for our legitimate interests and those of others which are to ensure effective safety of players, staff, fans and others at our offices, training grounds and match and other venues</td></tr> <tr><td>and, in addition for 'special category' personal data</td></tr> <tr><td>Explicit consent or</td></tr> <tr><td>It relates to personal data that are manifestly made public by you and/or</td></tr> <tr><td>It is necessary for insurance purposes and/or</td></tr> <tr><td>It is necessary for the establishment, exercise or defence of legal claims</td></tr> </table>	personal data	It is necessary for our legitimate interests and those of others which are to ensure effective safety of players, staff, fans and others at our offices, training grounds and match and other venues	and, in addition for 'special category' personal data	Explicit consent or	It relates to personal data that are manifestly made public by you and/or	It is necessary for insurance purposes and/or	It is necessary for the establishment, exercise or defence of legal claims	
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<p>Anti-corruption. Monitoring, compliance.</p>	<table border="1"> <tr><td>for personal data and 'special category' personal data</td></tr> <tr><td>It is in our legitimate interests and those of other sports to preserve standards in sport and</td></tr> <tr><td>It relates to personal data that are manifestly made public by you and/or</td></tr> <tr><td>It is necessary to protect the integrity of sport and/or</td></tr> <tr><td>It is necessary for the establishment, exercise or defence of legal claims</td></tr> </table>	for personal data and 'special category' personal data	It is in our legitimate interests and those of other sports to preserve standards in sport and	It relates to personal data that are manifestly made public by you and/or	It is necessary to protect the integrity of sport and/or	It is necessary for the establishment, exercise or defence of legal claims			
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<p>Safeguarding matters. Including dealing with safeguarding concerns raised/suspected.</p>	<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 and those of others to ensure the safety of all persons that are involved with or come into contact with 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					
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<p>Benefits administration. Enable delivery of pension and insurance schemes.</p>	<p>Personal data</p> <p>It is necessary for our legitimate interests which are to ensure compliance with Club's policies and objectives and managing its business effectively and to provide employee benefits; and/or</p> <p>It is necessary for compliance with a legal obligation</p> <p>and, in addition for 'special category' personal data</p> <p>Explicit consent or</p> <p>It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or</p> <p>It is necessary for insurance purposes and/or</p> <p>It is necessary for the establishment, exercise or defence of legal claims</p>
<p>Dealing with any grievances and disciplinary purposes. Dealing with grievances and administration for disciplinary purposes and regulatory enforcement</p>	<p>personal data</p> <p>It is necessary for our legitimate interests and those of others which are to ensure effective administration of applicants / staff members and to ensure they meet the requirements set by the Club's objectives and football governing bodies and it is in our legitimate interests and those of others to preserve standards in sport</p> <p>and, in addition for 'special category' personal data</p>

	Explicit consent or
	It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or
	It is necessary for scientific or historical research or statistical purposes and/or
	It is necessary to protect the integrity of sport and/or
	It is necessary for the establishment, exercise or defence of legal claims

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

for employees, contractors, students, volunteers, casual and temporary workers and work experience staff

<p>You</p> <p>Your agent / representative(s)</p> <p>Persons providing a reference for you</p> <p>Future employers to provide a reference <i>(if applicable)</i></p> <p>Family members</p> <p>Emergency contacts</p> <p>Football governing bodies such as The FA, EFL and Premier League, UEFA, FIFA</p> <p>The Club's owner(s) and shareholders</p> <p>Professional staff (including external medical professionals if applicable)</p> <p>Professional bodies for relevant members of staff</p> <p>Any agency used by the Club for dealing with recruitment <i>(where relevant)</i></p>	<p>The media / press / broadcasters</p> <p>Media agencies</p> <p>Stakeholders in anti-corruption matters including other sports organisations, the Gambling Commission, betting operators and sports related integrity units</p> <p>The world at large via Club websites, social media, brochures, press / media releases, newsletters and publicity materials</p> <p>Fans and club members <i>(where relevant)</i></p> <p>Sponsors and commercial partners</p> <p>Disciplinary panels</p> <p>Complainants</p> <p>Insurers</p> <p>HM Revenue & Customs</p> <p>Police and other law enforcement agencies</p>
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Relevant service providers that provide services for the Club	Local authorities and relevant agencies regarding safeguarding Professional advisers Regulators Courts or tribunals Government agencies (<i>where we have a legal obligation to do so</i>)	
family members	agents / representatives	emergency contacts
<p>You</p> <p>The applicant / staff member</p> <p>Travel and accommodation providers (<i>if applicable</i>)</p> <p>Insurers (<i>if applicable</i>)</p> <p>Police and other law enforcement agencies (<i>if applicable</i>)</p> <p>Local authorities and relevant agencies regarding safeguarding (<i>if applicable</i>)</p> <p>Legal and other professional advisers (<i>if applicable</i>)</p> <p>Football governing bodies such as The FA, EFL and Premier League, UEFA, FIFA (<i>if applicable</i>)</p> <p>Regulators (<i>if applicable</i>)</p> <p>Courts or tribunals (<i>if applicable</i>)</p> <p>Government agencies (<i>where we have a legal obligation to do so</i>)</p>	<p>You</p> <p>The applicant / staff member</p> <p>Police and other law enforcement agencies (<i>if applicable</i>)</p> <p>Local authorities and relevant agencies regarding safeguarding (<i>if applicable</i>)</p> <p>Legal and other professional advisers (<i>if applicable</i>)</p> <p>Football governing bodies such as The FA, EFL and Premier League, UEFA, FIFA (<i>if applicable</i>)</p> <p>The Club's owner(s) and shareholders</p> <p>HM Revenue & Customs (<i>if applicable</i>)</p> <p>Regulators (<i>if applicable</i>)</p> <p>Courts or tribunals (<i>if applicable</i>)</p> <p>Government agencies (<i>where we have a legal obligation to do so</i>)</p>	<p>You</p> <p>The applicant / staff member</p> <p>Local authorities and relevant agencies regarding safeguarding (<i>if applicable</i>)</p> <p>Police and other law enforcement agencies (<i>if applicable</i>)</p> <p>Government agencies (<i>where we have a legal obligation to do so</i>)</p>

Location of your personal data

In most cases, we normally keep your personal data within the United Kingdom or the European Economic Area. However, staff details may be shared with the owners of the Club who may be in other countries. Where a staff member is on tour or otherwise working in another country, personal data about the staff member and any family member who will be on the tour or is otherwise accompanying the staff member may be provided to organisations in those other countries, such as border control agencies, host clubs, hotels, insurers and medical professionals.

We may also make relevant information available to other tour team staff.

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.

For applicants, employees, contractors, students, volunteers, casual and temporary workers and work experience staff

family members / emergency contacts

<p>Safeguarding data</p> <p>Concerns about Children: until the individual reaches the age of 25 unless there is a legitimate interest to retain it for longer</p> <p>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</p> <p>Malicious allegations: immediate deletion unless there is a legitimate basis to retain it for longer</p> <p>Anti-corruption data and sanctions</p> <p>At least 2 years after the staff member's employment / engagement ends and may be longer, potentially indefinitely, where there is a continued risk</p> <p>Whistleblowing documents</p> <p>6 months following the outcome (if a substantiated investigation). If unsubstantiated, personal data should be removed immediately.</p> <p>Flexible working requests</p> <p>18 months following any appeal.</p> <p>Redundancy details</p> <p>6 years from date of redundancy</p> <p>References provided</p> <p>One year after the reference is given unless there is a legitimate basis to retain it for longer</p> <p>Right to work checks</p> <p>2 years after staff member's employment / engagement ends unless there is a legitimate basis to retain it for longer</p> <p>Statutory sick pay records, calculations, certificates, self-certificates</p> <p>6 years after staff member's employment / engagement ends unless there is a legitimate basis to retain it for longer</p> <p>Unsuccessful applicant data</p> <p>For 6 months unless there is a legitimate basis to retain it for longer</p>	<p>Disciplinary data</p> <p>For 10 years unless there is a legitimate basis to retain it for longer</p> <p>Contractual documentation</p> <p>For 6 years after the staff member's employment / engagement ends unless there is a legitimate basis to retain it for longer</p> <p>Payroll documentation</p> <p>For 6 years from the end of each tax year to which they relate unless there is a legitimate basis to retain it for longer</p> <p>Pension records</p> <p>12 years after the benefit ceases</p> <p>Income tax and NI returns, income tax records and correspondence with HMRC in respect of the same</p> <p>7 years after the end of the relevant financial year unless there is a legitimate basis to retain it for longer</p> <p>HMRC (formerly Inland Revenue) approvals</p> <p>Permanently</p> <p>National minimum wage records</p> <p>3 years after the end of the pay reference period following the one that the records cover</p> <p>Statutory maternity pay records including Mat B1s (also shared parental, paternity and adoption pay records)</p> <p>3 years after the end of the tax year in which the relevant period ends.</p> <p>Medical data</p> <p>6 years after the staff member's employment / engagement ends unless there is a legitimate basis or legal obligation to retain it for longer</p> <p>Training data</p> <p>6 years after staff member's employment/ engagement ends</p> <p>Accident records</p> <p>3 years from the last book / system entry (or until any younger person involved in the accident reaches 21)</p>	<p>Safeguarding data</p> <p>Concerns about Children: until the individual reaches the age of 25 unless there is a legitimate basis to retain it for longer</p> <p>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</p> <p>Malicious allegations: immediate deletion unless there is a legitimate basis to retain it for longer</p> <p>Medical</p> <p>6 years after the relevant benefit received by family member ends unless there is a legitimate basis or legal obligation to retain it for longer</p> <p>Anti-corruption data and sanctions</p> <p>At least 2 years after the staff member's employment / engagement ends and may be longer, potentially indefinitely, where there is a continued risk</p> <p>All other cases</p> <p>Normally for up to 3 years after the individual ceases to be employed / engaged by the Club or 3 years after our last contact with you (<i>whichever is longer</i>)</p> <p>agents / representatives</p> <p>Anti-corruption data and sanctions</p> <p>At least 2 years after the staff member's employment / engagement ends and may be longer, potentially indefinitely, where there is a continued risk</p> <p>All other cases</p> <p>Normally for 3 years after you cease to be an agent or representative for the staff member or 3 years after our last contact with you (<i>whichever is longer</i>)</p>
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All other cases

Normally for up to 3 years after the individual ceases to be employed / engaged by the Club or 3 years after our last contact with you (*whichever is 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 3 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@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