



# Academy Player Privacy Notice

(including family members, host families (including persons that stay at host family property and host family referees), agents, representatives and emergency contacts)

last updated 8 December 2023

West Bromwich Albion Football Club Limited (the **Club**) respects the privacy of all Academy players and everyone else associated with the Academy players. 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 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 (or how your parent / legal guardian / carer can do so on your behalf). 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 13 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)).

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

for players

Personal details	Employment	Medical information
<p>Title, name and any 'known as' name</p> <p>Contact details such as address, email address and phone number</p> <p>Nationality / citizenship / place of birth / languages spoken</p> <p>Copies of driving licence and passport</p> <p>Copy of visa and UK date of entry (if applicable)</p> <p>Copy of statutory declaration / permission for dual registration (if applicable)</p> <p>Vehicle registration number(s)</p> <p>Social media accounts and any aliases used</p> <p>Photographs and other images</p> <p>Anti-corruption details</p> <p>Sponsorship and image rights details (if applicable)</p>	<p>National insurance number</p> <p>HMRC and Home Office check results (where relevant)</p> <p>Bank account details</p> <p>Payroll records</p> <p>Tax details</p> <p>Pay and benefits (including any bonuses, prizes, supplements, car provision, holiday entitlement and holiday dates taken)</p> <p>Leave periods (including sickness, compassionate and parental)</p> <p>Start date / date of continuous employment</p> <p>Leaving date</p> <p>Location of employment or workplace</p> <p>Copies of right to work documents and, if relevant, International Clearance documentation</p> <p>Disciplinary and grievance details</p> <p>Working hours and requests for change</p> <p>Time keeping records (including through use of swipe card entry)</p> <p>Details of use of Club communication systems</p> <p>Pension and health insurance information</p> <p>Expenses to be paid or reimbursed by the Club</p> <p>Immigration status</p> <p>Health and medical insurance details and claims</p> <p>Conduct</p> <p>Grievances (including any whistleblowing where the player is identifiable)</p> <p>Overseas police vetting check (if applicable)</p> <p>Proof of residence</p> <p>Travel and accommodation details (if applicable)</p> <p>Contract(s) of engagement with the Club and termination and suspension details (if applicable)</p> <p>Insurance particulars and claim details</p>	<p>Medical records and information (including medical, strength and conditioning / fitness, physiotherapy, mental health, psychology, biometric data,</p> <p>dental, nutritional, dietary and injury records – including any test screening arrangements, results, scans and x-rays, diagnoses, treatment and rehabilitation allergy and intolerances information, vaccination status, medication past and present (prescribed and non-prescribed) special requirements and medical needs)</p> <p>Medical condition including sickness and injuries and disability (past and present)</p> <p>Fitness details including Performance improvement plans, fitness and rehabilitation, recommendations and plans, strength and conditioning and pitch-based programmes and progress, performance and attitude to the programmes</p> <p>Body measurements such as height, weight, body fat percentage and maturation status</p> <p>Details of medical treatment, care and fitness support offered, recommended, provided or refused</p> <p>Medical appointments and outcomes (including external medical and other professionals)</p> <p>Records of consents given and refused</p> <p>Anti doping records</p> <p>Health insurance claims</p> <p>Injury surveillance data (if applicable)</p>
<p><b>Diversity and inclusion</b></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><b>Performance data</b></p>	
<p><b>Criminal convictions and offences</b></p>		
<p><b>Relevant contacts</b></p> <p>Names and contact details of parent / legal guardian / carer and other family members (if applicable)</p> <p>Names and contact details of host family members</p> <p>Name and contact details of GP / Pharmacist</p> <p>Name and contact details of next of kin and emergency contacts</p> <p>Name and contact details of agent</p> <p>Name and contact details of legal and other professional representatives</p>		

<p><b>History and skills</b></p> <p>Football and other sport experience / qualifications</p> <p>Previous clubs, transfers and contracts with the Club</p> <p>Scouting reports</p> <p>Transfer / loan status</p> <p>Selection and playing records including for national and other teams, matches, tournaments, tours (if applicable)</p> <p>Whereabouts information</p> <p>Disciplinary related details including anti-doping, recreational drug use, anti-corruption and any evidence and sanctions imposed</p>	<p>Video and audio visual materials (including copies of any live streaming and interviews) that include you</p> <p>Tracking and performance data (including through use of wearable technology, GPS devices, sensor technology on balls, video-based technology and tracking devices)</p> <p><b>Academic information</b></p> <p>Player performance clock, including academic records, progression and attainment</p> <p><b>Safeguarding information</b></p> <p>Safeguarding concerns (including information about concerns raised, details of those persons involved, witness details, welfare reports, host family reports, actions recommended and taken).</p> <p><b>Hosted player additional information</b></p> <p>Requests to borrow money from host families</p> <p>Relationships between host family member or any person staying at host family property or relative/friend thereof and player</p> <p>Breaches of host family home rules and/or any other Club rules</p> <p>Concerns regarding Player's health, wellbeing or conduct</p> <p>Failure to attend host family property when supposed to</p> <p>Hobbies, likes and dislikes – for example, food, drink, pets, books, newspapers, magazines, holidays, music, musical instruments</p>	<p><b>Playing information</b></p> <p>Squad number</p> <p>Details of Club provided equipment, clothing and kit and use of it</p> <p>Matches selected for, played in and positions</p> <p>Video footage of training sessions and matches</p> <p>Feedback from matches and training sessions</p> <p>Media footage</p> <p>Match and other playing and performance statistics</p>
<p>agents / representatives</p>	<p>for family members / host families / persons that stay at host family property / referees of host families</p>	<p>for emergency contacts</p>
<p>Title, name and any 'known as' name</p> <p>Agency or organisation</p> <p>Contact details such as address, email address and phone number</p> <p>Player / player family members authorised to act for</p> <p>Copy of player Representation Contract</p> <p>Evidence in any anti-doping, recreational drug use and anti-corruption matters</p>	<p>Title, name and any 'known as' name</p> <p>Relationship to player</p> <p>Contact details such as address, email address and phone number</p> <p>Date of birth</p> <p>Photo</p> <p>Type of property lived in and facilities at or around that property</p> <p>Current occupation or previous occupation</p> <p>DBS checks and status</p> <p>Criminal investigations and criminal charges</p> <p>Relevant knowledge, experience, skills and training to be a host family</p> <p>Core family values of host family</p>	<p>Title, name and any 'known as' name</p> <p>Relationship to player and other family members of the player</p> <p>Contact details such as address, email address and phone number</p>

Medical conditions / disabilities / adjustments required as a result of medical conditions or disabilities

Smoking habits

Types of pets that live at property

Agent / representative (*if applicable*)

Citizenship, passport details, copy of visa and UK date of entry (*if applicable*)

Copy of driving licence

Referee details (referee name, occupation, contact details such as address, email address and phone number)

Evidence in any anti-doping, recreational drug use and anti-corruption matters

Hobbies, likes and dislikes – for example, food, drink, pets, books, newspapers, magazines, holidays, music, musical instruments

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.

## Where we get the personal data from

for players		
<p>You</p> <p>Your parent / legal guardian / carer</p> <p>Your host family <i>(if applicable)</i></p> <p>HM Revenue and Customs <i>(if applicable)</i></p> <p>Scouts</p> <p>Previous and loan clubs</p> <p>Other clubs and teams to which you are loaned or transferred or are being offered for loan or transfer</p> <p>Other clubs and teams from which you are loaned or transferred or are being offered for loan or transfer</p> <p>Any agency used by the Club for dealing with player loans and transfers</p> <p>Disciplinary panels</p> <p>Professional Footballers' Association (PFA)</p> <p>Family members</p> <p>Agents and representatives</p> <p>Referees and other match officials</p>	<p>Football governing bodies such as The FA, EFL, Premier League, UEFA and FIFA</p> <p>Leagues, other football clubs and competition organisers</p> <p>Research partners including Universities</p> <p>Education providers</p> <p>Medical professionals including the Club's own and external specialists and consultants</p> <p>Other players</p> <p>Coaches, the manager and the management team</p> <p>The media / press / broadcasters</p> <p>Scoring and analysis data providers</p> <p>Data service providers</p> <p>Media agencies</p>	<p>UK Anti-Doping / World Anti Doping Agency</p> <p>Stakeholders in anti-corruption matters including other sports organisations, the Gambling Commission, betting operators and sports related integrity units</p> <p>Social media</p> <p>Insurers</p> <p>Police and other law enforcement agencies</p> <p>Legal and other professional advisers</p> <p>Regulators</p>
family members / host families / persons that stay at host family property / host family referees	agents / representatives	emergency contacts
<p>You</p> <p>The player's parent / legal guardian / carer</p> <p>Host family member <i>(if applicable)</i></p> <p>The player</p> <p>Your agent / representative</p> <p>The player's agent / representative</p> <p>The media</p> <p>Social media</p> <p>The Club</p> <p>Insurers</p> <p>Legal and other professional advisers</p>	<p>You</p> <p>The player's parent / legal guardian / carer</p> <p>Host family member <i>(if applicable)</i></p> <p>The player</p> <p>Player family members</p> <p>Any agency used by the Club for dealing with player loans and transfers</p> <p>The media</p> <p>Social media</p> <p>The Club</p> <p>Legal and other professional advisers</p>	<p>You</p> <p>Host family member</p> <p>The player's parent / legal guardian / carer</p> <p>The player</p>
<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.</p> <p>We may use third party service providers to do this on our behalf.</p>		

## 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 players

Reason for using the personal data	Legal basis									
<p><b>Administration of registration.</b> Administration of the relevant professional player registration process, including verifying your general eligibility and eligibility to play; obtaining a Governing Body Endorsement (<i>if applicable</i>); administration of transfers and loans and any loan ;or transfer agreement entered into</p>	<table border="1"> <tr> <td>Personal data</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 compliance with a legal obligation and/or</td> </tr> <tr> <td>It is necessary for our legitimate interests which are to ensure players meet the requirements set by football governing bodies and the Club's policies and objectives and managing its business effectively</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 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 players meet the requirements set by football governing bodies and the Club's policies and objectives and managing its business effectively	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><b>Remuneration and benefits administration.</b> Includes payment of remuneration and expenses and to enable the delivery of pension and insurance schemes</p>										
<p><b>Internal administration.</b> Includes obtaining insurance, provision of clothing and equipment, making travel and accommodation arrangements; providing and obtaining references; assessment process for Academy status and general business administration</p>										
<p><b>Player training and selection.</b> Includes selection for talent and performance pathways as well as England teams</p>										
<p><b>Match and training administration.</b> Match and training arrangements</p>										
<p><b>Football education and training purposes.</b> Including player analysis, performance and development</p>										
<p><b>Appraisals and reviews and dealing with any grievances</b></p>										
<p><b>Contract compliance.</b> Ensuring compliance with your contract with the Club (<i>if applicable</i>) including rules set by the relevant football authorities</p>										
<p><b>Policy compliance.</b> Ensuring compliance with the Club's policies including the Club Player Rules and those for Social Media, Anti-Bribery, Modern Slavery, Anti-Corruption and IT and Information Systems Use</p>										
<p><b>Provision of education.</b> Ensuring that all players receive education and the monitoring of such education in the form of academic records, progression, attainment to help ensure that the player achieves their potential.</p>										
<p><b>Commercial activities.</b> Administration and carrying out Club commercial activities</p>										

<p>including those that have been specifically agreed with you / your family member(s) / agents / representatives / the PFA (as applicable)</p>										
<p><b>Player, coach, officials and team health and welfare.</b> Dealing with any medical issues, injuries, allergies, special needs and mental health concerns, providing dietary, physical and emotional support</p>	<table border="1"> <tr> <td data-bbox="703 282 1398 322">Personal data</td> </tr> <tr> <td data-bbox="703 331 1398 394">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="703 403 1398 495">It is necessary for our legitimate interests which are to ensure players have and maintain the levels of health and fitness required to play in the professional game and meet insurance requirements</td> </tr> <tr> <td data-bbox="703 535 1398 575">and, in addition for 'special category' personal data</td> </tr> <tr> <td data-bbox="703 584 1398 624">Explicit consent or</td> </tr> <tr> <td data-bbox="703 633 1398 696">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="703 705 1398 768">It is in your vital interests or the vital interests of another person and/or</td> </tr> <tr> <td data-bbox="703 777 1398 869">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</td> </tr> <tr> <td data-bbox="703 878 1398 940">It is necessary for the establishment, exercise or defence of legal claims</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 players have and maintain the levels of health and fitness required to play in the professional game and meet insurance requirements	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 in your vital interests or the vital interests of another person and/or	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	It is necessary for the establishment, exercise or defence of legal claims
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<p><b>Injury Surveillance Programme.</b> Collation and analysis of injury and illness data to determine the rates and severity of, and potential risk factors for, the most common injuries and illnesses suffered by footballers</p>	<table border="1"> <tr> <td data-bbox="703 1061 1398 1102">for personal data and 'special category' personal data</td> </tr> <tr> <td data-bbox="703 1111 1398 1151">Explicit consent</td> </tr> </table>	for personal data and 'special category' personal data	Explicit consent							
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<p><b>Wellbeing Surveillance Programme.</b> Collation and analysis of health, wellbeing, fitness and nutrition data to support and improve performance of footballers.</p>	<table border="1"> <tr> <td data-bbox="703 1223 1398 1263">for personal data and 'special category' personal data</td> </tr> <tr> <td data-bbox="703 1272 1398 1312">Explicit consent</td> </tr> </table>	for personal data and 'special category' personal data	Explicit consent							
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<p><b>Performance, injury, ailment, conditions, mental health and rehabilitation research.</b> Research into Player performance, injuries, ailments and conditions and mental health any rehabilitation recommended, taken up or declined</p>	<table border="1"> <tr> <td data-bbox="703 1352 1398 1393">for personal data and 'special category' personal data</td> </tr> <tr> <td data-bbox="703 1402 1398 1516">It is in our legitimate interests and those of other sports to understand the impact of professional sport on the human condition and facilitate evaluative judgment to ensure optimum on field performance and</td> </tr> <tr> <td data-bbox="703 1525 1398 1588">It is necessary for scientific or historical research or statistical purposes and/or</td> </tr> <tr> <td data-bbox="703 1597 1398 1659">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="703 1668 1398 1731">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 understand the impact of professional sport on the human condition and facilitate evaluative judgment to ensure optimum on field performance and	It is necessary for scientific or historical research or statistical purposes and/or	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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<p><b>Performance evaluation and analysis.</b> Evaluation of player's performance and playing statistics and benchmarking against other players' performance and statistics and making those available to relevant persons including coaches, scouts, the Manager, the management team and selectors</p>										
<p><b>Anti-doping, recreational drug taking, anti-corruption and fraud.</b> Monitoring, compliance and enforcement and dealing</p>	<table border="1"> <tr> <td data-bbox="703 2013 1398 2054">for personal data and 'special category' personal data</td> </tr> </table>	for personal data and 'special category' personal data								
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with any Therapeutic Use Exemption representations.	<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 measures designed to eliminate doping in sport or providing information about doping and suspecting doping and/or</p> <p>It is necessary to protect the integrity of sport and/or</p> <p>It is necessary for the establishment, exercise or defence of legal claims</p>
<p><b>Immigration status monitoring and compliance.</b> Includes administering Home Office audits (<i>if applicable</i>)</p>	<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 players meet the requirements set by football governing bodies and the Club's objectives</p>
<p><b>Diversity and inclusion monitoring.</b> Diversity monitoring and compliance (such as in respect of ethnicity, gender, race, age and disability) and providing equal opportunities</p>	<p>and, in addition for 'special category' personal data</p> <p>Explicit consent or</p> <p>It is necessary for the purposes of quality of opportunity and/or</p> <p>Is necessary for the establishment, exercise or defence of legal claims</p>
<p><b>Quality and improvement monitoring</b></p>	
<p><b>Disciplinary purposes.</b> 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 players and to ensure they meet the requirements set by football governing bodies and the Club's objectives and it is in our legitimate interests to maintain records of games and performance and it is in our legitimate interests and those of others to preserve standards in sport.</p>
<p><b>Record keeping.</b> Includes compiling a register of players and maintaining Club records including historical records of matches, conduct, details of appearances, training and match performance and statistics</p>	<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>
<p><b>Reputation.</b> Club, Player, football and team reputation management</p>	
<p><b>Publicity.</b> Publicity and media appearance activity</p>	
<p><b>Security.</b> Including the issue and use of security passes and personal protection personnel.</p>	<p>personal data</p> <p>It is necessary for our legitimate interests and those of others which are to ensure effective safety of players, staff, fans and others attending training grounds and match venues</p>



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<p><b>Legal matters.</b> Including dealing with legal claims and disputes.</p>	<table border="1"> <tr><td>Personal data</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 compliance with a legal obligation; and/or</td></tr> <tr><td>It is necessary for our legitimate interests which are to ensure manage the Club's business effectively</td></tr> </table> <table border="1"> <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 the establishment, exercise or defence of legal claims</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 manage the Club's business effectively	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 the establishment, exercise or defence of legal claims
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<p><b>Safeguarding matters.</b> Including dealing with safeguarding concerns raised/suspected and the use of host families to provide the player with accommodation, to allow host family and player to settle into host family accommodation/provision as quickly as possible and administration of the provision of host family accommodation.</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 and to preserve the reputation of the Club and the Academy</td></tr> </table> <table border="1"> <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 to preserve the reputation of the Club and the Academy	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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<p><b>Internal administration.</b> 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 player, family members of the player 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 player, family members of the player 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><b>Security.</b> 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 attending training grounds and match 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 attending training grounds and match 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><b>Anti-doping, recreational drug taking and anti-corruption.</b> Monitoring, compliance and enforcement and any Therapeutic Use Exemption representations.</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 for measures designed to eliminate doping in sport or providing information about doping and suspecting doping 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 for measures designed to eliminate doping in sport or providing information about doping and suspecting doping 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><b>Legal matters.</b> Including dealing with legal claims and disputes.</p>	<p>Personal data</p> <p>It is necessary to fulfil the contract that you are going to enter into or have entered into with us and/or</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 fulfil the Club's commitments to you and the player, to manage the Club's business effectively and to preserve the reputation of the Club and the Academy</p> <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>
<p><b>Administration of registration.</b> Administration of the relevant professional player registration process, including providing details of player's representation agreement with agent.</p>	<p>Personal data</p> <p>It is necessary to fulfil the contract that you are going to enter into or have entered into with us and/or</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 players meet the requirements set by football governing bodies and the Club's policies and objectives, to fulfil the Club's commitments to you and the player and to manage the Club's business effectively</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 insurance purposes and/or</p> <p>It is necessary for the establishment, exercise or defence of legal claims</p>
<p><b>Disciplinary purposes.</b> 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 players and to ensure they meet the requirements set by football governing bodies and the Club's objectives and it is in our legitimate interests to maintain</p>

	records of games and performance and it is in our legitimate interests and those of others to preserve standards in sport.
	and, in addition for 'special category' personal data
	Explicit consent 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
	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 before it was withdrawn. If you are under 13 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

players	
You Your agent / representative(s) Family members Host family members <i>(if applicable)</i> Emergency contacts Football governing bodies such as The FA (including the Professional Game Board), EFL and Premier League, UEFA, FIFA The Professional Footballers' Association (PFA) Referees and other match officials Coaches, the Manager and management team The Club's owner(s) and shareholders Professional staff (including external medical professionals if applicable) Clubs to which you are loaned or transferred or are being offered for loan or transfer Clubs from which you have been loaned or transferred or are being offered for loan or transfer Any agency used by the Club for dealing with player loans and transfers Other players <i>(where relevant)</i> Leagues, other clubs and competition organisers Sporting Chance <i>(where relevant)</i> Relevant service providers that provide services for the Club	The media / press / broadcasters Media agencies UK Anti-Doping / World Anti Doping Agency Stakeholders in anti-corruption matters The world at large via Club websites, social media, brochures, press / media releases, newsletters and publicity materials Fans and club members (where relevant) Sponsors and commercial partners Disciplinary panels Complainants Insurers HM Revenue & Customs Police and other law enforcement agencies Local authorities and relevant agencies regarding safeguarding Professional advisers Regulators Professional Game Academy Audit Company Courts or tribunals Government agencies <i>(where we have a legal obligation to do so)</i> Research partners and sports science academic students <i>(where we have consent to do so)</i>

family members / host families / persons that stay at host family property / host family referees	agents / representatives	emergency contacts
You The player's parent / legal guardian / carer Host family members <i>(if applicable)</i> The player Your agent / representative Host family referees The player's agent / representative Travel and accommodation providers	You The player's parent / legal guardian / carer Host family members <i>(if applicable)</i> The player Player family members Any agency used by the Club for dealing with player loans and transfers The media Social media	You The player's parent / legal guardian / carer Host family members <i>(if applicable)</i> The player The Club The player's agent / representative Police and other law enforcement agencies

<p>Insurers</p> <p>Police and other law enforcement agencies</p> <p>Local authorities and relevant agencies regarding safeguarding</p> <p>Legal and other professional advisers</p> <p>Coaches, the Manager and management team</p> <p>Football governing bodies such as The FA, EFL and Premier League, UEFA, FIFA</p> <p>UK Anti-Doping / World Anti Doping Agency</p> <p>HM Revenue &amp; Customs</p> <p>Regulators</p> <p>Courts or tribunals</p> <p>Professional Game Academy Audit Company</p> <p>Government agencies (<i>where we have a legal obligation to do so</i>)</p>	<p>Police and other law enforcement agencies</p> <p>Local authorities and relevant agencies regarding safeguarding</p> <p>Legal and other professional advisers</p> <p>Coaches, the Manager and management team</p> <p>The Club's owner(s) and shareholders</p> <p>Clubs to which the player is loaned or transferred or is being offered for loan or transfer</p> <p>Clubs from which the player has been loaned or transferred or is being offered for loan or transfer</p> <p>Leagues, other clubs and competition organisers</p> <p>Football governing bodies such as The FA, EFL and Premier League, UEFA, FIFA</p> <p>UK Anti-Doping / World Anti Doping Agency</p> <p>HM Revenue &amp; Customs</p> <p>Regulators</p> <p>Courts or tribunals</p> <p>Professional Game Academy Audit Company</p> <p>Government agencies (<i>where we have a legal obligation to do so</i>)</p>	<p>Local authorities and relevant agencies regarding safeguarding</p> <p>Legal and other professional advisers</p> <p>Regulators</p> <p>Courts or tribunals</p>
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## Where we keep your personal data

In most cases, we normally keep your personal data within the United Kingdom or the European Economic Area. However, player details may be shared with the owners of the Club who may be in other countries. Where a player is on tour in another country, personal data about the player and any family member / host family who will be on the tour 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 player information available to coaches and other tour team staff when a player is on tour outside of 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.

For players	family members / host families (including persons that stay at host family property) / emergency contacts
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<p><b>Medical records and information</b> For 10 years unless there is a legitimate interest to retain them for longer or for the duration of any legal proceedings (<i>whichever is longer</i>) or Where there is an ethical/professional reason to retain medical records and information for 30 years after the player retires from football, or 10 years after the death of the player or for the duration of any legal proceedings or for such period where there is a legitimate interest to retain them (<i>whichever is longer</i>)</p> <p><b>Match and playing records</b> Indefinitely as part of the Club's record of the game</p> <p><b>Performance data and statistics</b> Indefinitely as part of the Club's historical and statistics record</p> <p><b>Injury surveillance programme data</b> Indefinitely to help inform welfare and safety decision</p> <p><b>Safeguarding</b> 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 (<i>whichever is longer</i>) 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 Host Family Application Forms, host family medical declaration forms, profiles of host family and host player: for 6 years unless there is a legitimate basis to retain it for longer</p> <p><b>Publicity</b> Media releases and interview footage will be kept indefinitely as a part of the Club's record of publicity</p> <p><b>Accident records (other than forming part of medical records)</b> 3 years from the last book / system entry (or until any younger person involved in the accident reaches 21)</p> <p><b>Whistleblowing documents</b> 6 months following the outcome (if a substantiated investigation). If</p>	<p><b>Anti-doping</b> For 10 years in line with the World Anti-Doping Code</p> <p><b>Anti-corruption data and sanctions</b> At least 2 years after the player's employment ends and may be longer, potentially indefinitely, where there is a continued risk</p> <p><b>Disciplinary data</b> For 10 years unless there is a legitimate interest to retain it for longer</p> <p><b>Education records</b> Where the player does not sign a scholarship agreement with the Club, 3 years after they leave the Club unless there is a legitimate basis to retain it for longer Where the player signs a scholarship agreement with the Club, until the player reaches the age of 23 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</p> <p><b>Payroll documentation</b> For 6 years from the end of each tax year unless there is a legitimate basis to retain it for longer</p> <p><b>Income tax and NI returns, income tax records and correspondence with HMRC in respect of the same</b> 7 years after the end of the relevant financial year unless there is a legitimate basis to retain it for longer</p> <p><b>HMRC (formerly Inland Revenue) approvals</b> Permanently</p> <p><b>Contractual documentation</b> For 6 years unless there is a legitimate basis to retain it for longer</p> <p><b>All other cases</b> Normally for up to 3 years after the player ceases to be a player for the Club or 3 years after our last contact with you unless there is a legitimate basis to retain it for longer (<i>whichever is longer</i>)</p>	<p><b>Anti-corruption data and sanctions</b> At least 2 years after the player's employment ends and may be longer, potentially indefinitely, where there is a continued risk</p> <p><b>Medical</b> 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><b>Safeguarding</b> 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 (<i>whichever is longer</i>) 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 Host Family Application Forms, host family medical declaration forms, profiles of host family and host player: for 6 years unless there is a legitimate basis to retain it for longer</p> <p><b>All other cases</b> Normally for 3 years after the player ceases to be a player for the Club or 3 years after our last contact with you unless there is a legitimate basis to retain it for longer (<i>whichever is longer</i>) agents / representatives</p> <p><b>Anti-corruption data and sanctions</b> At least 2 years after the player's employment ends or you cease to be an agent / representative and may be longer, potentially indefinitely, where there is a continued risk</p> <p><b>Safeguarding</b> 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 (<i>whichever is longer</i>) 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</p> <p><b>Contractual documentation</b></p>
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unsubstantiated, personal data should be removed immediately.

**Working time requests**

18 months following any appeal.

**References provided**

One year after the reference is given unless there is a legitimate basis to retain it for longer

**Right to work checks**

2 years after the player ceases to be a player for the Club unless there is a legitimate basis to retain it for longer

**Statutory sick pay records, calculations, certificates, self-certificates**

6 years after the player ceases to be a player for the Club unless there is a legitimate interest to retain it for longer

For 6 years unless there is a legitimate basis to retain it for longer

**All other cases**

Normally for up to 3 years after you cease to be an agent or representative for the player / family member / host family or 3 years after our last contact with you unless there is a legitimate basis to retain it for longer (*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

(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 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